APPENDIX L
COMMENTS ON THE DRAFT EIS AND RESPONSES

PART 1

TABLE L-1

Comments Received on the Draft EIS

Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
FEDERAL AGENCIES (FA)			
FA01	NOAA National Marine Fisheries Service	2/5/19	20190206-5004
FA02	United States Coast Guard, Margaret Brown	2/5/19	20190205-5000
FA03	United States Environmental Protection Agency	3/12/19	20190312-5206
FA04	United States Department of Interior	3/13/19	20190313-5200
STATE AGENCIES (SA)			
SA01	Texas Commission on Environmental Quality	1/22/19	20190122-0008
SA02	Texas Parks & Wildlife Department	2/4/19	20190204-5206
SA03	Railroad Commission of Texas	3/1/19	20190308-5128
SA04	Railroad Commission of Texas	3/6/19	20190315-0010
LOCAL AGENCIES (LA)			
LA01	Port of Brownsville	1/29/19	20190201-5216
COMPANIES AND ORGANIZATIONS (CO)			
CO01	Suntrack Supply Services Inc	1/22/19	20190122-0007
CO02	Greater Brownsville Incentives Corporation	1/18/19	20190125-0041
CO03	South Texas Manufacturers Association	1/15/19	20190129-0035
CO04	Friends of Laguna Atascosa National Wildlife Refuge	2/4/19	20190204-5139
CO05	Annova LNG	2/4/19	20190204-5178
CO06	Friends of the Wildlife Corridor	2/4/19	20190204-5190
CO07	Institute for Policy Integrity	2/4/19	20190204-5245
CO08	Center for Liquified Natural Gas	1/24/19	20190130-5136
CO09	Annova LNG	2/4/19	20190204-5216
CO10	Sierra Club	2/4/19	20190204-5185
CO12	South Padre Chamber of Commerce	1/11/19	20190122-0006
ELECTED OFFICIALS (EO)			
EO01	Texas House of Representatives, District 38	2/1/19	20190204-5194
EO02	Texas House of Representatives	2/4/19	20190226-0015
EO03	Lieutenant Governor Dan Patrick	2/4/19	20190226-0014
EO04	Senator Eddie Lucio, Jr.	3/13/19	20190314-5000
PUBLIC COMMENT SESSION (PM)			
PM01	January 10, 2019 Public Comment Session – multiple individuals, see transcript below	1/10/19	20190222-4000
INDIVIDUALS (IND)			
IND01	Thomas Smith	12/28/18	20181228-5079
IND02	Kenneth G. Teague	1/4/19	20190104-5083
IND03	Gary Richards	1/9/19	20190109-5045
IND04	Jim Russell	1/14/19	20190114-5005
IND05	Sumner Herrick	1/14/19	20190114-5004
IND06	Justin Vosburg	1/14/19	20190114-5009
IND07	Mary A Branch	1/23/19	20190123-5146
IND08	Marie Norrell	1/25/19	20190125-0025
IND09	Sarah Stueber Bishop Merrill, M.S., Ph.D.	1/25/19	20190125-5022
IND10	Joyce Hamilton	1/29/19	20190129-0034
IND11	Individual	1/31/19	20190131-0011
IND12	Brian Schill	2/1/19	20190201-5120
IND13	Young	2/4/19	20190204-5089
IND14	Christine G Rakestraw	2/4/19	20190204-5062
IND15	Diane Teter	2/4/19	20190204-5105
IND16	Patrick Anderson	2/4/19	20190204-5173
IND17	Sarah Simpson	2/6/19	20190206-0014
IND18	Donald L Hockaday	2/4/19	20190204-5222
IND19	Christine G Rakestraw	2/5/19	20190205-5003
IND20	Barbara Hegarty	2/5/19	20190205-5010
IND21	Don Hockaday	2/4/19	20190205-5005
IND22	John Young	2/4/19	20190204-5256
IND23	Joyce M Hamilton	2/5/19	20190205-5026
IND24	Brooke Osborne	2/5/19	20190205-0007
IND25	Mickey Fetonte	2/5/19	20190205-0008

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND26	Liz Zepeda	2/5/19	20190205-0009
IND27	Kathleen Sjodin-Bunse	2/5/19	20190205-0010
IND28	Susan F Van Haitsma	2/5/19	20190205-0011
IND29	Austin Hyde	2/5/19	20190205-0012
IND30	Elyssa Browning	2/5/19	20190205-0013
IND31	Victoria Hendricks	2/5/19	20190205-0014
IND32	Brooke Penny	2/5/19	20190205-0015
IND33	Michael Panels	2/5/19	20190205-0016
IND34	Sean Carpenter	2/5/19	20190205-0017
IND35	Alyssa Tharp	2/5/19	20190205-0018
IND36	Kevin Gay	2/5/19	20190205-0019
IND37	Amanda Wright	2/5/19	20190205-0020
IND38	Suzzie Gagble	2/5/19	20190205-0021
IND39	Kiko Villamizar	2/5/19	20190205-0022
IND40	Barbara Hegarty	2/5/19	20190205-5010
IND41	Brianna Gaytan	2/5/19	20190205-5021
IND42	Cecilia Garrett	2/5/19	20190205-5022
IND43	Daniel Velez	2/5/19	20190205-5023
IND44	Cynthia Price	2/5/19	20190205-5024
IND45	David Fisher	2/5/19	20190205-5025
IND46	Elizabeth Pearl	2/5/19	20190205-5025
IND47	Ester H. Ybarra	2/5/19	20190205-5025
IND48	Gordon Watt	2/5/19	20190205-5025
IND49	Howard Cohen	2/5/19	20190205-5025
IND50	Joan Killelea	2/5/19	20190205-5025
IND51	John Keller	2/5/19	20190205-5025
IND52	Jonathan Salinas	2/5/19	20190205-5025
IND53	Juan Perez	2/5/19	20190205-5025
IND54	Karen Holleschau	2/5/19	20190205-5025
IND55	Kent Wittenburg	2/5/19	20190205-5025
IND56	Laura Germany	2/5/19	20190205-5025
IND57	Lee Hamilton	2/5/19	20190205-5025
IND58	Leigh Holleschau	2/5/19	20190205-5025
IND59	Lessie Spindle	2/5/19	20190205-5025
IND60	Linda Cooke	2/5/19	20190205-5025
IND61	Lynne Schaffer	2/5/19	20190205-5025
IND62	Marion Mason	2/5/19	20190205-5025
IND63	Marla Hanks	2/5/19	20190205-5025
IND64	Michele Cole	2/5/19	20190205-5025
IND65	Mimi Calter	2/5/19	20190205-5025
IND66	Muhammad Rashid	2/5/19	20190205-5025
IND67	Ned Sheats	2/5/19	20190205-5025
IND68	Rachael Brown	2/5/19	20190205-5025
IND69	Roberto Chavez	2/5/19	20190205-5025
IND70	Sarah Simpson	2/5/19	20190205-5025
IND71	Scott Nicol	2/5/19	20190205-5025
IND72	Terence Garrett	2/5/19	20190205-5025
IND73	Thomas Nieland	2/5/19	20190205-5025
IND74	Victoria Scharen	2/5/19	20190205-5025
IND75	Wacy Maggs	2/5/19	20190205-5025
IND76	Phyllis Sanders	2/6/19	20190206-0012
IND77	Carol Creech	2/6/19	20190206-0012
IND78	Nanette Gordon	2/6/19	20190206-0012
IND79	Stanley Wright	2/6/19	20190206-0012
IND80	Laura Hageman	2/6/19	20190206-0012
IND81	Kathleen Kinzler	2/6/19	20190206-0012
IND82	Kimo Virtanen	2/6/19	20190206-0012
IND83	William Larowe	2/6/19	20190206-0012
IND84	David Larsen	2/6/19	20190206-0012
IND85	Olivia Brown	2/6/19	20190206-0012
IND86	Kathryn Cain	2/6/19	20190206-0012

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND87	Stuart Crane	2/6/19	20190206-0012
IND88	Anna George	2/6/19	20190206-0012
IND89	Thomas Garcia	2/6/19	20190206-0012
IND90	Terry Burns	2/6/19	20190206-0012
IND91	Emily Garza	2/6/19	20190206-0012
IND92	Juli Kring	2/6/19	20190206-0012
IND93	Zeoma Olszewski	2/6/19	20190206-0012
IND94	Melinda Fritsch	2/6/19	20190206-0012
IND95	Ashley Jones	2/6/19	20190206-0012
IND96	Betty Mcdugald	2/6/19	20190206-0012
IND97	Linda Charlton	2/6/19	20190206-0012
IND98	Ruth Keitz	2/6/19	20190206-0012
IND99	Christian Rodriguez	2/6/19	20190206-0012
IND100	Brandy Gibbs	2/6/19	20190206-0012
IND101	Adriana Gonzalez	2/6/19	20190206-0012
IND102	Roberto Alvarado	2/6/19	20190206-0012
IND103	Greg Grubb	2/6/19	20190206-0012
IND104	Doug Simmer	2/6/19	20190206-0012
IND105	Beth Ann Sikes	2/6/19	20190206-0012
IND106	Natalie Martens	2/6/19	20190206-0012
IND107	Megan O'Connell	2/6/19	20190206-0012
IND108	Samuel Boazman	2/6/19	20190206-0012
IND109	Pam Sohan	2/6/19	20190206-0012
IND110	Patricia Stella	2/6/19	20190206-0012
IND111	Carolynn Snyder	2/6/19	20190206-0012
IND112	Teresa French	2/6/19	20190206-0012
IND113	Girard Arcand	2/6/19	20190206-0012
IND114	David Will	2/6/19	20190206-0012
IND115	Gary Hild	2/6/19	20190206-0012
IND116	F M	2/6/19	20190206-0012
IND117	Jed Mccuistion	2/6/19	20190206-0012
IND118	Walter Breymann	2/6/19	20190206-0012
IND119	Nelda Salinas	2/6/19	20190206-0012
IND120	Marta Diaz	2/6/19	20190206-0012
IND121	Anita Cannata-Nowell	2/6/19	20190206-0012
IND122	Allison Zborowski	2/6/19	20190206-0012
IND123	Mary Miller	2/6/19	20190206-0012
IND124	Deirdre Ohearn	2/6/19	20190206-0012
IND125	Marj Sears	2/6/19	20190206-0012
IND126	Derek Eckert	2/6/19	20190206-0012
IND127	Catherine Davis	2/6/19	20190206-0012
IND128	Barbara and Roby Odom	2/6/19	20190206-0012
IND129	Christine Lockhart	2/6/19	20190206-0012
IND130	Luis Zepeda	2/6/19	20190206-0012
IND131	Rick Provencio	2/6/19	20190206-0012
IND132	Veronica Perez	2/6/19	20190206-0012
IND133	Johnny Whitright	2/6/19	20190206-0012
IND134	Tracy Bonner	2/6/19	20190206-0012
IND135	Susan Cooper	2/6/19	20190206-0012
IND136	Margaret Tatum	2/6/19	20190206-0012
IND137	Carol Creech	2/6/19	20190206-0012
IND138	Jerry Mylius	2/6/19	20190206-0012
IND139	J Wells	2/6/19	20190206-0012
IND140	Eunice Garza	2/6/19	20190206-0012
IND141	Marianne and Stefan Vogt	2/6/19	20190206-0012
IND142	Austin Gray	2/6/19	20190206-0012
IND143	Chris Nicolosi	2/6/19	20190206-0012
IND144	Payten Maness	2/6/19	20190206-0012
IND145	Robert Perry	2/6/19	20190206-0012
IND146	Neal Baron	2/6/19	20190206-0012
IND147	Richard Walsh	2/6/19	20190206-0012

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND148	Guadalupe Yanez	2/6/19	20190206-0012
IND149	Diane Adams	2/6/19	20190206-0012
IND150	Pam Sonnen	2/6/19	20190206-0012
IND151	Charles Spencer	2/6/19	20190206-0012
IND152	Ashley Nelson	2/6/19	20190206-0012
IND153	John Willis	2/6/19	20190206-0012
IND154	Sandra Lira	2/6/19	20190206-0012
IND155	Melissa Noriega	2/6/19	20190206-0012
IND156	Juan Tejeda	2/6/19	20190206-0012
IND157	Molly Neeley	2/6/19	20190206-0012
IND158	Colleen Dieter	2/6/19	20190206-0012
IND159	Wenceslao Garza	2/6/19	20190206-0012
IND160	Melanie Sinclair	2/6/19	20190206-0012
IND161	Joan Cunningham	2/6/19	20190206-0012
IND162	Amber Manske	2/6/19	20190206-0012
IND163	Mark Goodman	2/6/19	20190206-0012
IND164	Danielle Ivie	2/6/19	20190206-0012
IND165	Barbara Swearingen	2/6/19	20190206-0012
IND166	Joe De Souza	2/6/19	20190206-0012
IND167	Mary D. Cartwright	2/6/19	20190206-0012
IND168	Jack Demarais	2/6/19	20190206-0012
IND169	Kristi Collins	2/6/19	20190206-0012
IND170	Archana Purushotham	2/6/19	20190206-0012
IND171	Terrie Williams	2/6/19	20190206-0012
IND172	George Duncan	2/6/19	20190206-0012
IND173	Neala Johnson	2/6/19	20190206-0012
IND174	H. Guh	2/6/19	20190206-0012
IND175	Lucinda Wierenga	2/6/19	20190206-0012
IND176	Mel Jordan	2/6/19	20190206-0012
IND177	Mary Tietjen	2/6/19	20190206-00124
IND178	Bianca Acosta	2/12/19	20190206-0012
IND179	Gabriela Trevino	2/12/19	20190206-0012
IND180	Susan Cooper	2/6/19	20190206-0012
IND181	Debra Johnson	2/6/19	20190206-0012
IND182	Margot Moczygemba	2/6/19	20190206-0012
IND183	Amanda Kay	2/6/19	20190206-0012
IND184	Leslie Hines	2/6/19	20190206-0012
IND185	Cristela Sifuentez	2/6/19	20190206-0012
IND186	Patricia Beltran	2/6/19	20190206-0012
IND187	Kara Page	2/6/19	20190206-0012
IND188	Madalynn Carey	2/6/19	20190206-0012
IND189	Catherine Pleasants	2/6/19	20190206-0012
IND190	Phillip Shephard	2/6/19	20190206-0012
IND191	John Rath	2/6/19	20190206-0012
IND192	Charles Foreman	2/6/19	20190206-0012
IND193	Richard Powe	2/6/19	20190206-0012
IND194	Ron Unger	2/6/19	20190206-0012
IND195	Nadia Traietti	2/6/19	20190206-0012
IND196	Joyce Dixon	2/6/19	20190206-0012
IND197	Helena Hopson	2/6/19	20190206-0012
IND198	Amanda Mahfood	2/6/19	20190206-0012
IND199	David Carter	2/6/19	20190206-0012
IND200	Cheryl Tanski	2/6/19	20190206-0012
IND201	Zachary Roberts Myones	2/6/19	20190206-0012
IND202	Ray C. Telfair II	2/6/19	20190206-0012
IND203	Marta Hubbard	2/6/19	20190206-0012
IND204	William Hoenes	2/6/19	20190206-0012
IND205	David Mulcihy	2/6/19	20190206-0012
IND206	Malva McIntosh	2/6/19	20190206-0012
IND207	James OFlaherty	2/6/19	20190206-0012
IND208	Janet Nongbri	2/6/19	20190206-0012

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND209	Catherine Milbourn	2/6/19	20190206-0012
IND210	Carolyn Nieland	2/6/19	20190206-0012
IND211	Tom Nieland	2/6/19	20190206-0012
IND212	Douglas Rives	2/6/19	20190206-0012
IND213	Andrew Lyall	2/6/19	20190206-0012
IND214	Elizabeth Rowland	2/6/19	20190206-0012
IND215	Craig Tatum	2/6/19	20190206-0012
IND216	Rebecca Sims	2/6/19	20190206-0012
IND217	Delaina Foster	2/6/19	20190206-0012
IND218	Ricardo Rojas	2/6/19	20190206-0012
IND219	Maria Reyna-Gomez	2/6/19	20190206-0012
IND220	Julie Bush	2/6/19	20190206-0012
IND221	Virginia Downing	2/6/19	20190206-0012
IND222	Rebecca Hall	2/6/19	20190206-0012
IND223	Santiago Gomez	2/6/19	20190206-0012
IND224	Maria Anna Esparza	2/6/19	20190206-0012
IND225	Michael Chavez	2/6/19	20190206-0012
IND226	Roel Cantu	2/6/19	20190206-0012
IND227	Rick Cruz	2/6/19	20190206-0012
IND228	Becky Wharton	2/6/19	20190206-0012
IND229	Kate Wasserman	2/6/19	20190206-0012
IND230	Ryan W.	2/6/19	20190206-0012
IND231	David Garcia	2/6/19	20190206-0012
IND232	Chia Guillory	2/6/19	20190206-0012
IND233	Craig Parker	2/6/19	20190206-0012
IND234	Mark Klugiewicz	2/6/19	20190206-0012
IND235	Darryl Malek-wiley	2/6/19	20190206-0012
IND236	Noe Acevedo	2/6/19	20190206-0012
IND237	Delysia Moore	2/6/19	20190206-0012
IND238	Alfonso Saldana	2/6/19	20190206-0012
IND239	Laurie Ward	2/6/19	20190206-0012
IND240	Amparo B. de Navarro	2/6/19	20190206-0012
IND241	Cheryl Smith	2/6/19	20190206-0012
IND242	Dale and Mary Erdmann	2/6/19	20190206-0012
IND243	Ken Dixon	2/6/19	20190206-0012
IND244	John Hanson	2/6/19	20190206-0012
IND245	Velia Garcia	2/6/19	20190206-0012
IND246	Leah Huddleston	2/6/19	20190206-0012
IND247	Jacob Shields	2/6/19	20190206-0012
IND248	Sara Gilath	2/6/19	20190206-0012
IND249	Kevin Rivas	2/6/19	20190206-0012
IND250	Karli Scalise	2/6/19	20190206-0012
IND251	Robin Sherwin	2/6/19	20190206-0012
IND252	Scarlett Bacon	2/6/19	20190206-0012
IND253	Courtney Sulak	2/6/19	20190206-0012
IND254	Michael Peterson	2/6/19	20190206-0012
IND255	Ingrid Hansen	2/6/19	20190206-0012
IND256	Roger Mathre	2/6/19	20190206-0012
IND257	Laura Codina	2/6/19	20190206-0012
IND258	Eleanor Raybold	2/6/19	20190206-0012
IND259	Denis Tidrick	2/6/19	20190206-0012
IND260	Karen Hill	2/6/19	20190206-0012
IND261	Shelley Dunham	2/6/19	20190206-0012
IND262	Frances Morgan	2/6/19	20190206-0012
IND263	Craig Parker	2/6/19	20190206-0014
IND264	Martha Eberle	2/6/19	20190206-0013
IND265	Isys Chamberlain	2/6/19	20190206-0013
IND266	Tresa Colston	2/6/19	20190206-0013
IND267	Andrew Hernandez	2/6/19	20190206-0013
IND268	Beverly Walker	2/6/19	20190206-0013
IND269	James Flanagan	2/6/19	20190206-0013

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND270	Thomas Nicolazzo	2/6/19	20190206-0013
IND271	Cindy Arellano	2/6/19	20190206-0013
IND272	Omar Elizondo	2/6/19	20190206-0013
IND273	Regina Stanley	2/6/19	20190206-0013
IND274	Camilla Figueroa	2/6/19	20190206-0013
IND275	Linda Hahus	2/6/19	20190206-0013
IND276	Naomi Dove	2/6/19	20190206-0013
IND277	Yvonne Hansen	2/6/19	20190206-0013
IND278	Dawn Langerock	2/6/19	20190206-0013
IND279	Jeff Tave	2/6/19	20190206-0013
IND280	Renee Reeves	2/6/19	20190206-0013
IND281	John Nelson	2/6/19	20190206-0013
IND282	Lily Beaumont	2/6/19	20190206-0013
IND283	Steve Bradley	2/6/19	20190206-0013
IND284	Steven Reilly	2/6/19	20190206-0013
IND285	Jean Finch	2/6/19	20190206-0013
IND286	Jennifer Prevost	2/6/19	20190206-0013
IND287	Spike Werda	2/6/19	20190206-0013
IND288	Jamie Owens	2/6/19	20190206-0013
IND289	Dennis Han	2/6/19	20190206-0013
IND290	Abbas Abbohamidi	2/6/19	20190206-0013
IND291	Phyllis Price	2/6/19	20190206-0013
IND292	Audrey H	2/6/19	20190206-0013
IND293	Mary Leon	2/6/19	20190206-0013
IND294	Venkata Kothapalli	2/6/19	20190206-0013
IND295	Marilyn Spivey	2/6/19	20190206-0013
IND296	Stacie Wells	2/6/19	20190206-0013
IND297	Sandy Schmidt	2/6/19	20190206-0013
IND298	Claud Bramblett	2/6/19	20190206-0013
IND299	Cindy Gabrielsen	2/6/19	20190206-0013
IND300	Ann Sever	2/6/19	20190206-0013
IND301	William Rosenthal	2/6/19	20190206-0013
IND302	Mike Harris	2/6/19	20190206-0013
IND303	David Bell	2/6/19	20190206-0013
IND304	Robert Arber	2/6/19	20190206-0013
IND305	Vincent Fonseca	2/6/19	20190206-0013
IND306	Linda Bedre Vaughn	2/6/19	20190206-0013
IND307	Diego Gavilanes	2/6/19	20190206-0013
IND308	Anne Martin	2/6/19	20190206-0013
IND309	Joel Quaintance	2/6/19	20190206-0013
IND310	Yesenia Ceja	2/6/19	20190206-0013
IND311	Aaron Faris	2/6/19	20190206-0013
IND312	Mark Hellums	2/6/19	20190206-0013
IND313	Cynthia Maguire	2/6/19	20190206-0013
IND314	Merilee Phillips	2/6/19	20190206-0013
IND315	Jim Jones	2/6/19	20190206-0013
IND316	Jim Boldin	2/6/19	20190206-0013
IND317	Ma Strange	2/6/19	20190206-0013
IND318	Bob Freeman	2/6/19	20190206-0013
IND319	Sondra York	2/6/19	20190206-0013
IND320	Monica Cortes	2/6/19	20190206-0013
IND321	Don Sawyer	2/6/19	20190206-0013
IND322	Ivy Buchanan	2/6/19	20190206-0013
IND323	Pat Smith	2/6/19	20190206-0013
IND324	Patricia Stinson-Sunbury	2/6/19	20190206-0013
IND325	Steven Smith	2/6/19	20190206-0013
IND326	Lisa Chung	2/6/19	20190206-0013
IND327	Laura Burns	2/6/19	20190206-0013
IND328	Steve Sears	2/6/19	20190206-0013
IND239	Charity Mccluskey	2/6/19	20190206-0013
IND330	Caroline Oneal	2/6/19	20190206-0013

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND331	Kari Brooks	2/6/19	20190206-0013
IND332	Robert Sendrey	2/6/19	20190206-0013
IND333	James Klein	2/6/19	20190206-0013
IND334	Elizabeth Young	2/6/19	20190206-0013
IND335	Elizabeth Parker	2/6/19	20190206-0013
IND336	Linda Hanratty	2/6/19	20190206-0013
IND337	Dodie Sweeney	2/6/19	20190206-0013
IND338	Evelyn Sardina	2/6/19	20190206-0013
IND339	Roma Norwine	2/6/19	20190206-0013
IND340	Vernon Berger	2/6/19	20190206-0013
IND341	Mary Kennedy	2/6/19	20190206-0013
IND342	Irene Martinez	2/6/19	20190206-0013
IND343	Jaen Lawrence	2/6/19	20190206-0013
IND344	Julisia Jackson	2/6/19	20190206-0013
IND345	Coleen Vicenti	2/6/19	20190206-0013
IND346	Michael Spradlin	2/6/19	20190206-0013
IND347	Jane Chischilly	2/6/19	20190206-0013
IND348	Lorelei Lambert	2/6/19	20190206-0013
IND349	Elaine Byrne	2/6/19	20190206-0013
IND350	Jacquelyn Dingley	2/6/19	20190206-0013
IND351	Lynn Rich	2/6/19	20190206-0013
IND352	Martin Pesaresi	2/6/19	20190206-0013
IND353	Ed Perry	2/6/19	20190206-0013
IND354	Cathy Chesser	2/6/19	20190206-0013
IND355	Jan E. Vaughan	2/6/19	20190206-0013
IND356	David Ruda	2/6/19	20190206-0013
IND357	Hector Medellin	2/6/19	20190206-0013
IND358	Kelly Hobbs	2/6/19	20190206-0013
IND359	Sandy Ransom	2/6/19	20190206-0013
IND360	Bill Holt et al.	2/6/19	20190206-0013
IND361	ED Breidenbach	2/6/19	20190206-0013
IND362	Mark Russell	2/6/19	20190206-0013
IND363	Evelyn Adams	2/6/19	20190206-0013
IND364	James Smith	2/6/19	20190206-0013
IND365	Patricia Schon	2/6/19	20190206-0013
IND366	Karen Sterling	2/6/19	20190206-0013
IND367	Turney Maurer	2/6/19	20190206-0013
IND368	Martin Penkwitz	2/6/19	20190206-0013
IND369	Danna Mcvey	2/6/19	20190206-0013
IND370	Ken Odell	2/6/19	20190206-0013
IND371	Christopher Hathaway	2/6/19	20190206-0013
IND372	Terri Mckeegan	2/6/19	20190206-0013
IND373	Terri McClung	2/6/19	20190206-0013
IND374	Margaret Little	2/6/19	20190206-0013
IND375	Tracy Mcmillan	2/6/19	20190206-0013
IND376	Sandy Phillips	2/6/19	20190206-0013
IND377	Rick Boykin	2/6/19	20190206-0013
IND378	Kent Rylander	2/6/19	20190206-0013
IND379	John Langston	2/6/19	20190206-0013
IND380	Yvonne Zepeda	2/6/19	20190206-0013
IND381	Gilberto Lopez	2/6/19	20190206-0013
IND382	Crystal Frias	2/6/19	20190206-0013
IND383	Marissa Williams	2/6/19	20190206-0013
IND384	Linda Hataway	2/6/19	20190206-0013
IND385	J Talbot	2/6/19	20190206-0013
IND386	Janet Phillips	2/6/19	20190206-0013
IND387	Michelle Emmitt	2/6/19	20190206-0013
IND388	Lisa Barrett	2/6/19	20190206-0013
IND389	Nika Dunn	2/6/19	20190206-0013
IND390	Laura Berrios	2/6/19	20190206-0013
IND391	Kathryn Brown	2/6/19	20190206-0013

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND392	Karin Ascot	2/6/19	20190206-0013
IND393	Simona Vigil	2/6/19	20190206-0013
IND394	Jane Miller Langley	2/6/19	20190206-0013
IND395	Michael Phipps	2/6/19	20190206-0013
IND396	Dr Stern	2/6/19	20190206-0013
IND397	Rhonda Boehm	2/6/19	20190206-0013
IND398	Joseph Krause	2/6/19	20190206-0013
IND399	Tanya Kasper	2/6/19	20190206-0013
IND400	Julie Mayfield	2/6/19	20190206-0013
IND401	Gary Kasper	2/6/19	20190206-0013
IND402	Sabrina Cook	2/6/19	20190206-0013
IND403	Tracy Ferlet	2/6/19	20190206-0013
IND404	Linda Cooke	2/6/19	20190206-0013
IND405	Carolyn Croom	2/6/19	20190206-0013
IND406	Linda Bedre	2/6/19	20190206-0013
IND407	Katheryn Rogers	2/6/19	20190206-0013
IND408	Alan Ogden	2/6/19	20190206-0013
IND409	Micki Casino Gerardi	2/6/19	20190206-0013
IND410	William Parham	2/6/19	20190206-0013
IND411	Suzanne Taylor	2/6/19	20190206-0013
IND412	Donna B Matthews	2/6/19	20190206-0013
IND413	Sybil Morgan	2/6/19	20190206-0013
IND414	Linda Maher	2/6/19	20190206-0013
IND415	Michelle Smith	2/6/19	20190206-0013
IND416	Dennis Deacon	2/6/19	20190206-0013
IND417	Amy Maxwell	2/6/19	20190206-0013
IND418	Herman Rhein	2/6/19	20190206-0013
IND419	Laura Brush	2/6/19	20190206-0013
IND420	Mary Hancock	2/6/19	20190206-0013
IND421	Kerry White	2/6/19	20190206-0013
IND422	Melissa Guynes	2/6/19	20190206-0013
IND423	Jo Boles	2/6/19	20190206-0013
IND424	Yanira Aguirre	2/6/19	20190206-0013
IND425	Zara Barron	2/6/19	20190206-0013
IND426	Robert Gary	2/6/19	20190206-0013
IND427	Patsy Sasek	2/6/19	20190206-0013
IND428	Cheyenne Weaver	2/6/19	20190206-0013
IND429	Laura Carbonneau	2/6/19	20190206-0013
IND430	Jacob Fakheri	2/6/19	20190206-0013
IND431	Judy Clark	2/6/19	20190206-0013
IND432	Haiden Wattley	2/6/19	20190206-0013
IND433	Shawn Troxell	2/6/19	20190206-0013
IND434	Choky Alvarez	2/6/19	20190206-0013
IND435	Jane Lundquist	2/6/19	20190206-0013
IND436	Lynda Arredon	2/6/19	20190206-0013
IND437	Sharon Daly	2/6/19	20190206-0014
IND438	Gail Williams	2/6/19	20190206-0014
IND439	Robert Bauer	2/6/19	20190206-0014
IND440	Deena Berg	2/6/19	20190206-0014
IND441	Roger Knudson	2/6/19	20190206-0014
IND442	Bonnie Clements	2/6/19	20190206-0014
IND443	Linda Fielder	2/6/19	20190206-0014
IND444	Susan Bussa	2/6/19	20190206-0014
IND445	Margaret Schulenberg	2/6/19	20190206-0014
IND446	Samuela Walker	2/6/19	20190206-0014
IND447	Rebecca Mccuistion	2/6/19	20190206-0014
IND448	Clif Jordan	2/6/19	20190206-0014
IND449	Debbie Hyde	2/6/19	20190206-0014
IND450	Sharon Haywood	2/6/19	20190206-0014
IND451	CJ Vaughn	2/6/19	20190206-0014
IND452	Kay Mcbrayer	2/6/19	20190206-0014

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND453	Judith Stueve	2/6/19	20190206-0014
IND454	Pat Johnson	2/6/19	20190206-0014
IND455	Sara Straube	2/6/19	20190206-0014
IND456	Claud and Sharon Bramblett	2/6/19	20190206-0014
IND457	James Clark	2/6/19	20190206-0014
IND458	Crystal Bowling	2/6/19	20190206-0014
IND459	Carina Ramirez	2/6/19	20190206-0014
IND460	Pam Sohan	2/6/19	20190206-0014
IND461	Carolina Ysasaga	2/6/19	20190206-0014
IND462	Kim Sanders George	2/6/19	20190206-0014
IND463	Wanda Kirkpatrick	2/6/19	20190206-0014
IND464	Rick Gordon	2/6/19	20190206-0014
IND465	Susan Finley	2/6/19	20190206-0014
IND466	Janice Kidd	2/6/19	20190206-0014
IND467	Catherine Croom	2/6/19	20190206-0014
IND468	Harvey Collen	2/6/19	20190206-0014
IND469	Nancy Walsh	2/6/19	20190206-0014
IND470	Fatima Quraali	2/6/19	20190206-0014
IND471	Cris Nelson	2/6/19	20190206-0014
IND472	David Allison	2/6/19	20190206-0014
IND473	Roberta Beckman	2/6/19	20190206-0014
IND474	Laura Tabor	2/6/19	20190206-0014
IND475	Lilli Pell	2/6/19	20190206-0014
IND476	Lucia Carter	2/6/19	20190206-0014
IND477	Elizabeth Whitlow	2/6/19	20190206-0014
IND478	Stephen Brown	2/6/19	20190206-0014
IND479	Stacey Schodek	2/6/19	20190206-0014
IND480	Zeb Hanley	2/6/19	20190206-0014
IND481	Susan Hradsky	2/6/19	20190206-0014
IND482	Laura Sander	2/6/19	20190206-0014
IND483	Diana Wheeler	2/6/19	20190206-0014
IND484	Liz LaFour	2/6/19	20190206-0014
IND485	Diana Gamez	2/6/19	20190206-0014
IND486	Patricia Thomson	2/6/19	20190206-0014
IND487	Fran Wessel	2/6/19	20190206-0014
IND488	Jerry Bailey	2/6/19	20190206-0014
IND489	L. Fielder	2/6/19	20190206-0014
IND490	Nancy Rosenberg	2/6/19	20190206-0014
IND491	Karen Ricks	2/6/19	20190206-0014
IND492	Edward Lackey	2/6/19	20190206-0014
IND493	Darvin Oliver	2/6/19	20190206-0014
IND494	Cynthia Meyer	2/6/19	20190206-0014
IND495	Allison Vitek	2/6/19	20190206-0014
IND496	Debra McCawley	2/6/19	20190206-0014
IND497	Frederick Chase	2/6/19	20190206-0014
IND498	Stephen Stoker	2/6/19	20190206-0014
IND499	Theresa Martinez	2/6/19	20190206-0014
IND500	Bettie Winsett	2/6/19	20190206-0014
IND501	Kathleen Younghans	2/6/19	20190206-0014
IND502	Luis Perez	2/6/19	20190206-0014
IND503	Cynthia Prince	2/6/19	20190206-0014
IND504	Natasha Tuckett	2/6/19	20190206-0014
IND505	Billiejean Jones	2/6/19	20190206-0014
IND506	Severa Krausse	2/6/19	20190206-0014
IND507	Leonor Smith Zacarias	2/6/19	20190206-0014
IND508	John Browning	2/6/19	20190206-0014
IND509	Pam Turlak	2/6/19	20190206-0014
IND510	Monica Arsate	2/6/19	20190206-0014
IND511	Monica Montalvo	2/6/19	20190206-0014
IND512	Gena Sadler	2/6/19	20190206-0014
IND513	Jeff Warner	2/6/19	20190206-0014

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND514	Alexandra Canel	2/6/19	20190206-0014
IND515	Edward Grigassy	2/6/19	20190206-0014
IND516	J Iverson	2/6/19	20190206-0014
IND517	Joshua Jacinto	2/6/19	20190206-0014
IND518	Robert Martin	2/6/19	20190206-0014
IND519	Patricia Brooks	2/6/19	20190206-0014
IND520	Annette Pieniazek	2/6/19	20190206-0014
IND521	Noemi Silva	2/6/19	20190206-0014
IND522	Will Golding	2/6/19	20190206-0014
IND523	Aguedys Whittaker	2/6/19	20190206-0014
IND524	Waldo Castro	2/6/19	20190206-0014
IND525	Vince Mendieta	2/6/19	20190206-0014
IND526	Lori Namapee	2/6/19	20190206-0014
IND527	Stephen Schwausch	2/6/19	20190206-0014
IND528	Gaye Hokden	2/6/19	20190206-0014
IND529	Steven Bailey	2/6/19	20190206-0014
IND530	Ellen Cote	2/6/19	20190206-0014
IND531	Bob Bardo	2/6/19	20190206-0014
IND532	Sarah Zepeda	2/6/19	20190206-0014
IND533	Carol Porras	2/6/19	20190206-0014
IND534	Kimberly Gilbertson	2/6/19	20190206-0014
IND535	Rebecca Sharp	2/6/19	20190206-0014
IND536	Gerard Sullivan	2/6/19	20190206-0014
IND537	Rogelio Alcoser	2/6/19	20190206-0014
IND538	Ryan Scinta	2/6/19	20190206-0014
IND539	Shannon Prescott	2/6/19	20190206-0014
IND540	Albert Downing	2/6/19	20190206-0014
IND541	Charles Paget	2/6/19	20190206-0014
IND542	Jessica Bozeman	2/6/19	20190206-0014
IND543	Leslie Brown	2/6/19	20190206-0014
IND544	S Hartman	2/6/19	20190206-0014
IND545	Charles Counterman	2/6/19	20190206-0014
IND546	Candace Halliburton	2/6/19	20190206-0014
IND547	R Write	2/6/19	20190206-0014
IND548	Joe Rogers	2/6/19	20190206-0014
IND549	Georgena Askew	2/6/19	20190206-0014
IND550	David Burnett	2/6/19	20190206-0014
IND551	Bruce Burns	2/6/19	20190206-0014
IND552	Andrea Johnson	2/6/19	20190206-0014
IND553	Nicholas Delossantos	2/6/19	20190206-0014
IND554	Linda Kroeger	2/6/19	20190206-0014
IND555	Donald Owen	2/6/19	20190206-0014
IND556	Kathy Dorman	2/6/19	20190206-0014
IND557	Barry Brossa	2/6/19	20190206-0014
IND558	Carol Pennington	2/6/19	20190206-0014
IND559	Jeffrey Crozier	2/6/19	20190206-0014
IND560	Shanna Bradford	2/6/19	20190206-0014
IND561	Cynthia Curtis	2/6/19	20190206-0014
IND562	Julia Burgen	2/6/19	20190206-0014
IND563	Dirk Rogers	2/6/19	20190206-0014
IND564	Eric Scheilhagen	2/6/19	20190206-0014
IND565	Leah Klein	2/6/19	20190206-0014
IND566	Baldamar Lopez	2/6/19	20190206-0014
IND567	Jane Gilley	2/6/19	20190206-0014
IND568	Nick and Diana Rudolph	2/6/19	20190206-0014
IND569	Alan Holt	2/6/19	20190206-0014
IND570	Sarah Lindholm	2/6/19	20190206-0014
IND571	Edwin and Patricia Sasek	2/6/19	20190206-0014
IND572	Christina Campos	2/6/19	20190206-0014
IND573	Kate Mathis	2/6/19	20190206-0014
IND574	Steve and Rachael Alvarez-Jett	2/6/19	20190206-0014

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND575	Lisa Gewax	2/6/19	20190206-0014
IND576	Soria Adibi	2/6/19	20190206-0014
IND577	Ruby Ahiquist	2/6/19	20190206-0014
IND578	Ricardo Rojas	2/6/19	20190206-0014
IND579	Lizeth Marquez	2/6/19	20190206-0014
IND580	John Reiter	2/6/19	20190206-0014
IND581	De Hy	2/6/19	20190206-0014
IND582	Mark Witte	2/6/19	20190206-0014
IND583	Bryan Taylor	2/6/19	20190206-0014
IND584	Nara Wood	2/6/19	20190206-0014
IND585	Ronald Shenberger	2/6/19	20190206-0014
IND586	Genevieve Ali	2/6/19	20190206-0014
IND587	Asad Rahbar	2/6/19	20190206-0014
IND588	M Cole	2/6/19	20190206-0014
IND589	Sandra Varvel	2/6/19	20190206-0014
IND590	Amy Ardington	2/6/19	20190206-0014
IND591	Craig Nazor	2/6/19	20190206-0014
IND592	Nancy Lehmann	2/6/19	20190206-0014
IND593	Steve Garland	2/6/19	20190206-0014
IND594	Astrid Thomsen	2/6/19	20190206-0014
IND595	Vigil Rosser	2/6/19	20190206-0014
IND596	Joanne Fell	2/6/19	20190206-0014
IND597	Russell Hollier	2/6/19	20190206-0014
IND598	David Davidson	2/6/19	20190206-0014
IND599	Alan Montemayor	2/6/19	20190206-0014
IND600	Vera Smith	2/6/19	20190206-0014
IND601	Lala Bae	2/6/19	20190206-0014
IND602	Kathrin Dodds	2/6/19	20190206-0014
IND603	William Skinner	2/6/19	20190206-0014
IND604	Joseph Reynolds	2/6/19	20190206-0014
IND605	Brian Strasters	2/6/19	20190206-0014
IND606	Mary Greenway	2/6/19	20190206-0014
IND607	Kevin Abate	2/6/19	20190206-0014
IND608	Nancy Fullerton	2/6/19	20190206-0014
IND609	Raje Wolf	2/6/19	20190206-0014
IND610	David and Susanne Arbiter	2/6/19	20190206-0014
IND611	Gareth White	2/6/19	20190206-0014
IND612	Thomas Templeton	2/6/19	20190206-0014
IND613	Yury Ragoza	2/6/19	20190206-0014
IND614	Ron Serino	2/6/19	20190206-0014
IND615	Erin White	2/6/19	20190206-0014
IND616	Sharon Baron	2/6/19	20190206-0014
IND617	Debra Walker	2/6/19	20190206-0014
IND618	Sherri Sherbo	2/6/19	20190206-0014
IND619	Theresa Flanagan	2/6/19	20190206-0014
IND620	Carolyn Rich	2/6/19	20190206-0014
IND621	Annette Mcanally	2/6/19	20190206-0016
IND622	Deborah Williams	2/6/19	20190206-0016
IND623	Robert Gilliland	2/6/19	20190206-0016
IND624	Harriet Horton	2/6/19	20190206-0016
IND625	Amy Quate	2/6/19	20190206-0016
IND626	Kat Feuerbacher	2/6/19	20190206-0016
IND627	Cindy Brittain	2/6/19	20190206-0016
IND628	Fred Lindner	2/6/19	20190206-0016
IND629	Christiana Brinton	2/6/19	20190206-0016
IND630	Eugene Molina	2/6/19	20190206-0016
IND631	Mary Jozwiak	2/6/19	20190206-0016
IND632	Yolanda Birdwell	2/6/19	20190206-0016
IND633	Sandy York	2/6/19	20190206-0016
IND634	Valerie Hernandez	2/6/19	20190206-0016
IND635	Barbara Anderson	2/6/19	20190206-0016

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND636	James Gillum	2/6/19	20190206-0016
IND637	Michael Collard	2/6/19	20190206-0016
IND638	Karen Sprague	2/6/19	20190206-0016
IND639	Melanie Demartinis	2/6/19	20190206-0016
IND640	Gloria Skillman	2/6/19	20190206-0016
IND641	Linda Berger	2/6/19	20190206-0016
IND642	Elisa Hirt	2/6/19	20190206-0016
IND643	Julia Woodward-Parker	2/6/19	20190206-0016
IND644	Kathy Rinehart	2/6/19	20190206-0016
IND645	Jill Buchanan	2/6/19	20190206-0016
IND646	Julie Solell	2/6/19	20190206-0016
IND647	Jim Tucker	2/6/19	20190206-0016
IND648	Mary Cato	2/6/19	20190206-0016
IND649	Rochelle Brackman	2/6/19	20190206-0016
IND650	Nettie Standiford	2/6/19	20190206-0016
IND651	Jose Gomez	2/6/19	20190206-0016
IND652	Lauren Danford	2/6/19	20190206-0016
IND653	Frank Dufour	2/6/19	20190206-0016
IND654	Harold Albers	2/6/19	20190206-0016
IND655	Teran Hughes	2/6/19	20190206-0016
IND656	Cheryl Morris	2/6/19	20190206-0016
IND657	Tammy Scott	2/6/19	20190206-0016
IND658	Kathryn Samec	2/6/19	20190206-0016
IND659	Teresa Saldivar	2/6/19	20190206-0016
IND660	Elizabeth Grimsley	2/6/19	20190206-0016
IND661	Andrea MacRae	2/6/19	20190206-0016
IND662	Holly Thiel	2/6/19	20190206-0016
IND663	Donna Crittenden	2/6/19	20190206-0016
IND664	Nancy Mcgrath	2/6/19	20190206-0016
IND665	Douglas Chalmers	2/6/19	20190206-0016
IND666	Pat Roberson	2/6/19	20190206-0016
IND667	Katie Drackert	2/6/19	20190206-0016
IND668	Eva Coleman	2/6/19	20190206-0016
IND669	Tracy Briney	2/6/19	20190206-0016
IND670	Irenia Salazar-Parada	2/6/19	20190206-0016
IND671	Charmaine Berry	2/6/19	20190206-0016
IND672	Cima Malkhassian	2/6/19	20190206-0016
IND673	Diane and Michael Wonio	2/6/19	20190206-0016
IND674	Gwynne Carosella	2/6/19	20190206-0016
IND675	Monique Mcintyre	2/6/19	20190206-0016
IND676	Karen Naumann	2/6/19	20190206-0016
IND677	Christina Scattergood	2/6/19	20190206-0016
IND678	Richard Schlenk	2/6/19	20190206-0016
IND679	Brittney Collins	2/6/19	20190206-0016
IND680	Catherine Willmann	2/6/19	20190206-0016
IND681	Tracy Simmons	2/6/19	20190206-0016
IND682	Joan Allison	2/6/19	20190206-0016
IND683	Jeanne Jordan	2/6/19	20190206-0016
IND684	Sherry Andresen	2/6/19	20190206-0016
IND685	William Romfh	2/6/19	20190206-0016
IND686	Joanne segura-Delgado	2/6/19	20190206-0016
IND687	Betsy Lambert	2/6/19	20190206-0016
IND688	Bill France	2/6/19	20190206-0016
IND689	Kristina Williams	2/6/19	20190206-0016
IND690	Angela Barrera	2/6/19	20190206-0016
IND691	Lynsey Holland	2/6/19	20190206-0016
IND692	Melodie Palmer	2/6/19	20190206-0016
IND693	Kathleen Bryson	2/6/19	20190206-0016
IND694	Doyle Sebesta	2/6/19	20190206-0016
IND695	Todd Teulon	2/6/19	20190206-0016
IND696	Alexis Sosa	2/6/19	20190206-0016

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND697	Mike Johnson	2/6/19	20190206-0016
IND698	Marla Hanks	2/6/19	20190206-0016
IND699	Sheyla Mendoza	2/6/19	20190206-0016
IND700	Derek Luft	2/6/19	20190206-0016
IND701	Alice Kuchenthal	2/6/19	20190206-0016
IND702	Deana Phillips	2/6/19	20190206-0016
IND703	Terry Burton	2/6/19	20190206-0016
IND704	Elizabeth Burton	2/6/19	20190206-0016
IND705	Jeanne Kyser	2/6/19	20190206-0016
IND706	Jose Sanchez	2/6/19	20190206-0016
IND707	Sheila Simpson	2/6/19	20190206-0016
IND708	Terri McNeal	2/6/19	20190206-0016
IND709	Gloria Silva	2/6/19	20190206-0016
IND710	Gilbert Pritchett	2/6/19	20190206-0016
IND711	Cameron Babberney	2/6/19	20190206-0016
IND712	Leslie Hopkins	2/6/19	20190206-0016
IND713	Penny Hartwell	2/6/19	20190206-0016
IND714	William Michael	2/6/19	20190206-0016
IND715	Clarisa Rostro	2/6/19	20190206-0016
IND716	Rose Morris	2/6/19	20190206-0016
IND717	Duane Patrick	2/6/19	20190206-0014
IND718	Alexander Helou	2/6/19	20190206-0016
IND719	Cliff Perkins	2/6/19	20190206-0016
IND720	Betty Alex	2/6/19	20190206-0016
IND721	Corliss Crabtree	2/6/19	20190206-0016
IND722	P Leal	2/6/19	20190206-0016
IND723	Mary Mueller	2/6/19	20190206-0016
IND724	Ann Mcgory	2/6/19	20190206-0016
IND725	Tayyab Malik	2/6/19	20190206-0016
IND726	Mittie Hinz	2/6/19	20190206-0016
IND727	Felipe-Andres Piedra	2/6/19	20190206-0016
IND728	James Lipsey	2/6/19	20190206-0016
IND729	Jessimikuh Shhboom	2/6/19	20190206-0016
IND730	Marie Norrell	2/6/19	20190206-0016
IND731	John Rooney	2/6/19	20190206-0016
IND732	John Fisher	2/6/19	20190206-0016
IND733	Mary Celaya	2/6/19	20190206-0016
IND734	Erika Shea	2/6/19	20190206-0016
IND735	Craig Liebendorfer	2/6/19	20190206-0016
IND736	Mark Monger	2/6/19	20190206-0016
IND737	Sarah Page	2/6/19	20190206-0016
IND738	William Cook	2/6/19	20190206-0016
IND739	Connie Leblanc	2/6/19	20190206-0016
IND740	Debra Francis	2/6/19	20190206-0016
IND741	Anna Kaiser	2/6/19	20190206-0016
IND742	James Rice	2/6/19	20190206-0016
IND743	Bill Rogers	2/6/19	20190206-0016
IND744	Jane Jatinen	2/6/19	20190206-0016
IND745	David Michalek	2/6/19	20190206-0016
IND746	Frank Blake	2/6/19	20190206-0016
IND747	Morgan Meyers	2/6/19	20190206-0016
IND748	Linda Brust	2/6/19	20190206-0016
IND749	Roberto Salazar	2/6/19	20190206-0016
IND750	Martha Honey	2/6/19	20190206-0016
IND751	Mackenzie Crone	2/6/19	20190206-0016
IND752	Kathy Pinckney	2/6/19	20190206-0016
IND753	Marie Palos	2/6/19	20190206-0016
IND754	David Mohan	2/6/19	20190206-0016
IND755	Bianca Marcuccino-Walsh	2/6/19	20190206-0016
IND756	Gary Aten	2/6/19	20190206-0016
IND757	Carol Denning	2/6/19	20190206-0016

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND758	Debra Hollinger	2/6/19	20190206-0016
IND759	Suzanne Gil	2/6/19	20190206-0016
IND760	Robert Bauhs	2/6/19	20190206-0016
IND761	Rebekah Farrell	2/6/19	20190206-0016
IND762	Gaye Holden	2/6/19	20190206-0016
IND763	Jennifer Nichols	2/6/19	20190206-0016
IND764	Brian Schill	2/6/19	20190206-0016
IND765	David Powell	2/6/19	20190206-0016
IND766	Mariel Davis	2/6/19	20190206-0016
IND767	Pam Jaso	2/6/19	20190206-0016
IND768	David Dorsey	2/6/19	20190206-0016
IND769	Sophia Melendez	2/6/19	20190206-0016
IND770	Linda Greene	2/6/19	20190206-0016
IND771	Reynolds Reynolds	2/6/19	20190206-0016
IND772	Krissie Marty	2/6/19	20190206-0016
IND773	Alma Mata	2/6/19	20190206-0016
IND774	Lonne Martinec	2/6/19	20190206-0016
IND775	Kurtis Castellanos	2/6/19	20190206-0016
IND776	Marie Hamm	2/6/19	20190206-0016
IND777	Karen Arceri	2/6/19	20190206-0016
IND778	Molly Rooke	2/6/19	20190206-0016
IND779	Sarah Burden-Mcclure	2/6/19	20190206-0016
IND780	Alice Perez	2/6/19	20190206-0016
IND781	Christina Esmahan	2/6/19	20190206-0016
IND782	Tria Shaffer	2/6/19	20190206-0016
IND783	Bianca Gallegos	2/6/19	20190206-0016
IND784	Michael and Jeanne Galvin	2/6/19	20190206-0016
IND785	Ling Zhu	2/6/19	20190206-0016
IND786	Sarah Fawcett	2/6/19	20190206-0016
IND787	Joe Lopez	2/6/19	20190206-0016
IND788	Carol Fly	2/6/19	20190206-0016
IND789	Iris Waser	2/6/19	20190206-0016
IND790	Evelyn Myler	2/6/19	20190206-0016
IND791	Cecile Burandt	2/6/19	20190206-0016
IND792	Michael Gray	2/6/19	20190206-0016
IND793	L Borgen	2/6/19	20190206-0016
IND794	Carla Harris	2/6/19	20190206-0016
IND795	Lauren Ide	2/6/19	20190206-0016
IND796	Martin Terry	2/6/19	20190206-0016
IND797	Kenneth Johnson	2/6/19	20190206-0016
IND798	Kris Manley	2/6/19	20190206-0016
IND799	Suzanne Herzing	2/6/19	20190206-0016
IND800	John-Michael Torres	2/6/19	20190206-0016
IND801	Teresa Pietersen	2/6/19	20190206-0016
IND802	Kathryn Davidson	2/6/19	20190206-0016
IND803	Michael and Susie Way	2/6/19	20190206-0016
IND804	Shirley Slampa	2/6/19	20190206-0016
IND805	Karen Phillips	2/6/19	20190206-0016
IND806	Sarah Berner	2/6/19	20190206-0016
IND807	Antoinette Freeman	2/6/19	20190206-0016
IND808	Teresa Summerlin	2/6/19	20190206-0016
IND809	Riley Walberg	2/6/19	20190206-0016
IND810	John Ader	2/6/19	20190206-0016
IND811	June Jensen	2/6/19	20190206-0016
IND812	Grace Pruitt	2/6/19	20190206-0016
IND813	Hernan Ortega	2/6/19	20190206-0016
IND814	Anthony Sanchez	2/6/19	20190206-0016
IND815	Missy Elley	2/6/19	20190206-0016
IND816	Pam Wetzels	2/6/19	20190206-0016
IND817	Colleen Theriot	2/6/19	20190206-0016
IND818	Nancy Latner	2/6/19	20190206-0016

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND819	Jonathan Sanders	2/6/19	20190206-0016
IND820	Michelle Esposito	2/6/19	20190206-0016
IND821	Ashley Beard	2/6/19	20190206-0016
IND822	Melanie Schuchart	2/6/19	20190206-0016
IND823	Enedelia Salinas	2/6/19	20190206-0016
IND824	Chris Soignier	2/6/19	20190206-0016
IND825	Jeremiah Stith	2/6/19	20190206-0016
IND826	Jack Elam	2/6/19	20190206-0016
IND827	Eugenia Schuler	2/6/19	20190206-0016
IND828	Elizabeth Venable	2/6/19	20190206-0016
IND829	Linda Olsoe	2/6/19	20190206-0016
IND830	Jensie Madden	2/6/19	20190206-0016
IND831	Raynae Baker	2/6/19	20190206-0016
IND832	Susan Thorn	2/6/19	20190206-0016
IND833	Judith Bentancourt	2/6/19	20190206-0016
IND834	Sandy Simmons	2/6/19	20190206-0016
IND835	Sari Albornoz	2/6/19	20190206-0016
IND836	Mari Wilson	2/6/19	20190206-0016
IND837	Lillian Nance	2/6/19	20190206-0016
IND838	Stewart Yaros	2/6/19	20190206-0016
IND839	Shelby Scarbrough	2/6/19	20190206-0016
IND840	Trinity Cobb	2/6/19	20190206-0016
IND841	Susie Thompson	2/6/19	20190206-0016
IND842	Lisa Parisi	2/6/19	20190206-0016
IND843	Patty Adams	2/6/19	20190206-0016
IND844	Celeste Rosales	2/6/19	20190206-0016
IND845	Kayla Muzquiz	2/6/19	20190206-0016
IND846	Cheryl Watson	2/6/19	20190206-0016
IND847	E Ingraham	2/6/19	20190206-0016
IND848	Mary McDonald	2/6/19	20190206-0016
IND849	Marilyn Endres	2/6/19	20190206-0016
IND850	John Lethco	2/6/19	20190206-0016
IND851	Brian Abernathy	2/6/19	20190206-0015
IND852	Jane Abrams	2/6/19	20190206-0015
IND853	Noe Acevedo	2/6/19	20190206-0015
IND854	U Sakoglu	2/6/19	20190206-0015
IND855	P.S. Allison	2/6/19	20190206-0015
IND856	Max Anderson	2/6/19	20190206-0015
IND857	Sandra Arzola	2/6/19	20190206-0015
IND858	Jill Bailey	2/6/19	20190206-0015
IND859	Scott Baker	2/6/19	20190206-0015
IND860	Justin Bautista	2/6/19	20190206-0015
IND861	Bea Bee	2/6/19	20190206-0015
IND862	Bhuvanesh Bhatt	2/6/19	20190206-0015
IND863	Denise Bickford	2/6/19	20190206-0015
IND864	Sarah Bijoy	2/6/19	20190206-0015
IND865	John Boriack	2/6/19	20190206-0015
IND866	Justin Bosler	2/6/19	20190206-0015
IND867	Tia Bostarter	2/6/19	20190206-0015
IND868	Carol Box	2/6/19	20190206-0015
IND869	Ciara Boyer	2/6/19	20190206-0015
IND870	Kate Bremer	2/6/19	20190206-0015
IND871	Becky Browning	2/6/19	20190206-0015
IND872	Klementyna Bryte	2/6/19	20190206-0015
IND873	Richard Buck	2/6/19	20190206-0015
IND874	Elizabeth Burnette	2/6/19	20190206-0015
IND875	Kathryn Burns	2/6/19	20190206-0015
IND876	Carolyn Nieland	2/6/19	20190206-0015
IND877	Christine Smith	2/6/19	20190206-0015
IND878	Grace Cagle	2/6/19	20190206-0015
IND879	Richard Caldwell	2/6/19	20190206-0015

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND880	Barbara Campbell	2/6/19	20190206-0015
IND881	Lisa Canorro	2/6/19	20190206-0015
IND882	Celine Capiccioni	2/6/19	20190206-0015
IND883	Paul Cardwell	2/6/19	20190206-0015
IND884	Cathy Carpentier	2/6/19	20190206-0015
IND885	Rosemary Carson	2/6/19	20190206-0015
IND886	Marisol Cervantes	2/6/19	20190206-0015
IND887	Khy Chapman	2/6/19	20190206-0015
IND888	Jose Choquehaunca	2/6/19	20190206-0015
IND889	Chris Clark	2/6/19	20190206-0015
IND890	John Clary	2/6/19	20190206-0015
IND891	Mary Cohron	2/6/19	20190206-0015
IND892	Danielle Cole	2/6/19	20190206-0015
IND893	Debra Coleman	2/6/19	20190206-0015
IND894	Audrey Colombe	2/6/19	20190206-0015
IND895	Linda Cox	2/6/19	20190206-0015
IND896	Diana Clark	2/6/19	20190206-0015
IND897	Susan Daugherty	2/6/19	20190206-0015
IND898	Alfred Davila	2/6/19	20190206-0015
IND899	Ilene Dillon-Fink	2/6/19	20190206-0015
IND900	Ken Dixon	2/6/19	20190206-0015
IND901	Carolyn Downs	2/6/19	20190206-0015
IND902	Stephanie Doyle	2/6/19	20190206-0015
IND903	Susana Dunlap	2/6/19	20190206-0015
IND904	John Edwards	2/6/19	20190206-0015
IND905	Suzy Eide	2/6/19	20190206-0015
IND906	Susan Ellis	2/6/19	20190206-0015
IND907	Stephanie Ertel	2/6/19	20190206-0015
IND908	Dan Everly	2/6/19	20190206-0015
IND909	Brad First	2/6/19	20190206-0015
IND910	Diamond Flores	2/6/19	20190206-0015
IND911	Marcha Fox	2/6/19	20190206-0015
IND912	Jose Gamobia	2/6/19	20190206-0015
IND913	Xylia Garcia	2/6/19	20190206-0015
IND914	Margaret Garza	2/6/19	20190206-0015
IND915	Carol Gerson	2/6/19	20190206-0015
IND916	Jennifer Golden	2/6/19	20190206-0015
IND917	Patricia Gonzales	2/6/19	20190206-0015
IND918	Autumn Gonzalez	2/6/19	20190206-0015
IND919	Mark Goodman	2/6/19	20190206-0015
IND920	Kathy Goodwin	2/6/19	20190206-0015
IND921	Karen Grosse-Ramirez	2/6/19	20190206-0015
IND922	Shannon Grounds	2/6/19	20190206-0015
IND923	John Guest	2/6/19	20190206-0015
IND924	Sandi Hebley	2/6/19	20190206-0015
IND925	Jacqui Hamlett	2/6/19	20190206-0015
IND926	Don Hammond	2/6/19	20190206-0015
IND927	Robin Hanson	2/6/19	20190206-0015
IND928	Pamela Hardwick	2/6/19	20190206-0015
IND929	Lucy Harmon	2/6/19	20190206-0015
IND930	Dan Harrison	2/6/19	20190206-0015
IND931	Jana Harter	2/6/19	20190206-0015
IND932	Miguel Hernandez	2/6/19	20190206-0015
IND933	Claudia Herrera	2/6/19	20190206-0015
IND934	Janice Hewitt	2/6/19	20190206-0015
IND935	Ginger Himelright	2/6/19	20190206-0015
IND936	Holly Holmes	2/6/19	20190206-0015
IND937	Jean Hopkins	2/6/19	20190206-0015
IND938	Athenea Hughes	2/6/19	20190206-0015
IND939	Lee Hutchings	2/6/19	20190206-0015
IND940	Adrienne Inglis	2/6/19	20190206-0015

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND941	Pete Inman	2/6/19	20190206-0015
IND942	Teresa Iovino	2/6/19	20190206-0015
IND943	Katie Irani	2/6/19	20190206-0015
IND944	John Wilson	2/6/19	20190206-0015
IND945	Henry Jackson	2/6/19	20190206-0015
IND946	Kyle Jeffries	2/6/19	20190206-0015
IND947	Ann Joseph	2/6/19	20190206-0015
IND948	Karen Browning	2/6/19	20190206-0015
IND949	Kirk and Xochitl Jackson	2/6/19	20190206-0015
IND950	Sierra King	2/6/19	20190206-0015
IND951	Alison Kirsch	2/6/19	20190206-0015
IND952	Tracey Kunkler	2/6/19	20190206-0015
IND953	Pamela Kurner	2/6/19	20190206-0015
IND954	Lori Williams	2/6/19	20190206-0015
IND955	Juanita Lambie	2/6/19	20190206-0015
IND956	Julia Landress	2/6/19	20190206-0015
IND957	Stephanie Levinson	2/6/19	20190206-0015
IND958	John Lewis	2/6/19	20190206-0015
IND959	Elizabeth Lopez	2/6/19	20190206-0015
IND960	Rev Luis Ignacio Gameros M Div	2/6/19	20190206-0015
IND961	Matt Lykken	2/6/19	20190206-0015
IND962	Laris Manescu	2/6/19	20190206-0015
IND963	Pamela Massey	2/6/19	20190206-0015
IND964	Sharon Matz	2/6/19	20190206-0015
IND965	Andrea Maxwell	2/6/19	20190206-0015
IND966	Sally McAfee	2/6/19	20190206-0015
IND967	K McGaughy	2/6/19	20190206-0015
IND968	Meredith McGuire	2/6/19	20190206-0015
IND969	Susan McKinley	2/6/19	20190206-0015
IND970	Allison Metzger	2/6/19	20190206-0015
IND971	Eric Meyer	2/6/19	20190206-0015
IND972	Kent and Karol Middleton	2/6/19	20190206-0015
IND973	Diana L Montejano	2/6/19	20190206-0015
IND974	Laura Mordecai	2/6/19	20190206-0015
IND975	Winnie Tate Morgan	2/6/19	20190206-0015
IND976	Tilsa Muldoon	2/6/19	20190206-0015
IND977	Martha Mullens	2/6/19	20190206-0015
IND978	Anthony Murray	2/6/19	20190206-0015
IND979	Tracy Musgrove	2/6/19	20190206-0015
IND980	Roger Neumann	2/6/19	20190206-0015
IND981	Susan Nichols	2/6/19	20190206-0015
IND982	Thomas Nieland	2/6/19	20190206-0015
IND983	Karen Norton	2/6/19	20190206-0015
IND984	William Okain	2/6/19	20190206-0015
IND985	Sidney Parsons	2/6/19	20190206-0015
IND986	Victoria Patterson	2/6/19	20190206-0015
IND987	Patricia Patteson	2/6/19	20190206-0015
IND988	Anita Pauwels	2/6/19	20190206-0015
IND989	Syliva Pena	2/6/19	20190206-0015
IND990	Cynthia Perez	2/6/19	20190206-0015
IND991	Judy Perkins	2/6/19	20190206-0015
IND992	Al Plata	2/6/19	20190206-0015
IND993	Beverly Polan	2/6/19	20190206-0015
IND994	Mary Pustejovsky	2/6/19	20190206-0015
IND995	Emilio Ramirez	2/6/19	20190206-0015
IND996	Linda Ramos	2/6/19	20190206-0015
IND997	Cathy Ramsey	2/6/19	20190206-0015
IND998	Carol Reinking	2/6/19	20190206-0015
IND999	Ana Reza	2/6/19	20190206-0015
IND1000	Christina Richer	2/6/19	20190206-0015
IND1001	Kim Riggins	2/6/19	20190206-0015

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND1002	Maritza Rodriguez	2/6/19	20190206-0015
IND1003	Barbara Rogers	2/6/19	20190206-0015
IND1004	Terri Rose	2/6/19	20190206-0015
IND1005	Debbie Rothermel	2/6/19	20190206-0015
IND1006	Jean Rothfusz	2/6/19	20190206-0015
IND1007	Michael Russell	2/6/19	20190206-0015
IND1008	Michelle Rutan	2/6/19	20190206-0015
IND1009	Miroslava Saenz	2/6/19	20190206-0015
IND1010	Claudio Salazar	2/6/19	20190206-0015
IND1011	Blanca Sanchez-Navarro	2/6/19	20190206-0015
IND1012	Dorothy Schleicher	2/6/19	20190206-0015
IND1013	Linda Schubert	2/6/19	20190206-0015
IND1014	Phillip Scott	2/6/19	20190206-0015
IND1015	Bonni Scudder	2/6/19	20190206-0015
IND1016	Rose Slatouski	2/6/19	20190206-0015
IND1017	Jan Smith	2/6/19	20190206-0015
IND1018	Judith Snape	2/6/19	20190206-0015
IND1019	Elisabeth Sommer	2/6/19	20190206-0015
IND1020	Sandra Sparks	2/6/19	20190206-0015
IND1021	Nathan Stanfield	2/6/19	20190206-0015
IND1022	Diana Steinhagen	2/6/19	20190206-0015
IND1023	Teresa Stoever	2/6/19	20190206-0015
IND1024	Jeff Stone	2/6/19	20190206-0015
IND1025	Dominic Stricherz	2/6/19	20190206-0015
IND1026	Shelby Strickland	2/6/19	20190206-0015
IND1027	Rachel Stroud	2/6/19	20190206-0015
IND1028	Dan Sundberg	2/6/19	20190206-0015
IND1029	Cindy Symington	2/6/19	20190206-0015
IND1030	Joanna Symmonds	2/6/19	20190206-0015
IND1031	Tina Theriaque	2/6/19	20190206-0015
IND1032	Mary Timmons	2/6/19	20190206-0015
IND1033	Joe Tompkins	2/6/19	20190206-0015
IND1034	Sid Totten	2/6/19	20190206-0015
IND1035	Diane Trudeau	2/6/19	20190206-0015
IND1036	Lannie Tucker	2/6/19	20190206-0015
IND1037	Lesa Tyson	2/6/19	20190206-0015
IND1038	Tandie Van Den Berg	2/6/19	20190206-0015
IND1039	Jane Leatherman Van Praag	2/6/19	20190206-0015
IND1040	Jason Vandever	2/6/19	20190206-0015
IND1041	Gumecindo Villanueva	2/6/19	20190206-0015
IND1042	Lois Wagenseil	2/6/19	20190206-0015
IND1043	Susan Waskey	2/6/19	20190206-0015
IND1044	Debra Watson	2/6/19	20190206-0015
IND1045	Eileen Welch	2/6/19	20190206-0015
IND1046	Beth Wernick	2/6/19	20190206-0015
IND1047	Becky Wharton	2/6/19	20190206-0015
IND1048	Mauri Williams	2/6/19	20190206-0015
IND1049	Twila Willis	2/6/19	20190206-0015
IND1050	Ellen Willmore	2/6/19	20190206-0015
IND1051	Dog Wood	2/6/19	20190206-0015
IND1052	J E Yee	2/6/19	20190206-0015
IND1053	Tracy Zadwick	2/6/19	20190206-0015
IND1054	Andrea Gonzalez	2/7/19	20190207-5031
IND1055	Ariadne Acevedo	2/7/19	20190207-5031
IND1056	Katelyn Aguirre	2/7/19	20190207-5031
IND1057	Mike Anderson	2/7/19	20190207-5031
IND1058	Robert Anzaldua	2/7/19	20190207-5031
IND1059	Dennis Bates	2/7/19	20190207-5031
IND1060	Lydia Beckham	2/7/19	20190207-5031
IND1061	Evan Bloom	2/7/19	20190207-5031
IND1062	Briana Brown	2/7/19	20190207-5031

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Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND1063	Joseph Cantu	2/7/19	20190207-5031
IND1064	Alejandro Flores	2/7/19	20190207-5031
IND1065	Karen Carbiener	2/7/19	20190207-5031
IND1066	Ivan Celedon	2/7/19	20190207-5031
IND1067	Roel Cepeda	2/7/19	20190207-5031
IND1068	Magaly Cornejo	2/7/19	20190207-5031
IND1069	Dora Garcia	2/7/19	20190207-5031
IND1070	Patrick de la Garza Und Senkel	2/7/19	20190207-5031
IND1071	Reta Durham	2/7/19	20190207-5031
IND1072	Esther Martinez	2/7/19	20190207-5031
IND1073	Elizabeth Perez	2/7/19	20190207-5031
IND1074	Joshua Ekrut	2/7/19	20190207-5031
IND1075	Nicole Ekstrom	2/7/19	20190207-5031
IND1076	Fancy Fairchild	2/7/19	20190207-5031
IND1077	Tabatha Ferguson	2/7/19	20190207-5031
IND1078	Pearl Fry	2/7/19	20190207-5031
IND1079	Jacqueline Galarza	2/7/19	20190207-5031
IND1080	Maria Galasso	2/7/19	20190207-5031
IND1081	Mariela Garcia	2/7/19	20190207-5031
IND1082	Michele Gardner	2/7/19	20190207-5031
IND1083	Harry Goette	2/7/19	20190207-5031
IND1084	Shayla Gonzalez	2/7/19	20190207-5031
IND1085	Leticia Guerra	2/7/19	20190207-5031
IND1086	Carly Hamilton	2/7/19	20190207-5031
IND1087	Edna Goette	2/7/19	20190207-5031
IND1088	Elizabeth Head	2/7/19	20190207-5031
IND1089	Selena Herrera	2/7/19	20190207-5031
IND1090	Frank Hobin	2/7/19	20190207-5031
IND1091	Larry Hollmann	2/7/19	20190207-5031
IND1092	Javier Guerra	2/7/19	20190207-5031
IND1093	Juan Martinez	2/7/19	20190207-5031
IND1094	Dianne Johnson	2/7/19	20190207-5031
IND1095	Steven Lanoux	2/7/19	20190207-5031
IND1096	Natalie Van Leekwijck	2/7/19	20190207-5031
IND1097	Mary Hollmann	2/7/19	20190207-5031
IND1098	John MacFarlane	2/7/19	20190207-5031
IND1099	Ashley Martinez	2/7/19	20190207-5031
IND1100	William McKinney	2/7/19	20190207-5031
IND1101	Doris Meinerding	2/7/19	20190207-5031
IND1102	Vince Mendieta	2/7/19	20190207-5031
IND1103	Richard Mendoza	2/7/19	20190207-5031
IND1104	Leslie Burr	2/7/19	20190207-5031
IND1105	Melissa Perez	2/7/19	20190207-5031
IND1106	Robert Garcia	2/7/19	20190207-5031
IND1107	Carol Midboe	2/7/19	20190207-5031
IND1108	Angel Ramirez	2/7/19	20190207-5031
IND1109	Louise Reavis	2/7/19	20190207-5031
IND1110	Jennifer Rodriguez	2/7/19	20190207-5031
IND1111	Tom Sagona	2/7/19	20190207-5031
IND1112	Niquita Salinas	2/7/19	20190207-5031
IND1113	Ceclia Sanchez	2/7/19	20190207-5031
IND1114	Theresa Speck	2/7/19	20190207-5031
IND1115	Laurel Steinberg	2/7/19	20190207-5031
IND1116	David Thurston	2/7/19	20190207-5031
IND1117	Sergio Trevino	2/7/19	20190207-5031
IND1118	Elizabeth Watts	2/7/19	20190207-5031
IND1119	Lucinda Wierenga	2/7/19	20190207-5031
IND1120	Steve Wilder	2/7/19	20190207-5031
IND1121	Bradley Willis	2/7/19	20190207-5031
IND1122	Oscar Zertuche	2/7/19	20190207-5031
IND1123	Tom Sagona	2/25/19	20190225-5006

TABLE L-1

Comments Received on the Draft EIS

Letter Number	Agency/Commenter Name	Date of Letter/ Comment Session	FERC Docket Accession Number
IND1124	Isidro Leal	3/11/19	20190311-4000
IND1125	Xandra Leal	3/11/19	20190311-4001
IND1126	Ava Leal	3/11/19	20190311-4002
IND1127	Michael Baguio	3/11/19	20190311-4003
IND1128	Laura Baguio	3/11/19	20190311-4004
IND1129	Juan B Maucias	3/11/19	20190311-4005
IND1130	Lucas Mosley	3/11/19	20190311-4006
IND1131	Joe Linck	3/11/19	20190311-4007
IND1132	James Tucker	3/13/19	20190313-5081
IND1133	Jennie McBride	3/13/19	20190313-4001
IND1134	Ed McBride	3/13/19	20190313-4002
IND1135	Mary Volz	3/13/19	20190313-4003
IND1136	Glenn Boward	3/13/19	20190313-4004
IND1137	Grant Wilson	3/13/19	20190313-5166
IND1138	Isidro Leal	3/13/19	20190313-4005
IND1139	Karen Boward	3/13/19	20190313-4006
IND1140	Angel Ramirez	3/13/19	20190313-5219
IND1141	Ariadne Acevedo	3/13/19	20190313-5219
IND1142	Bill Wlilliams	3/13/19	20190313-5219
IND1143	Carolyn Nieland	3/13/19	20190313-5219
IND1144	Christy Tovar	3/13/19	20190313-5219
IND1145	Drue Ann Wise	3/13/19	20190313-5219
IND1146	Edna Goette	3/13/19	20190313-5219
IND1147	Elizabeth Freeth	3/13/19	20190313-5219
IND1148	Elizabeth J Goble	3/13/19	20190313-5219
IND1149	Ian Martinez	3/13/19	20190313-5219
IND1150	Jan Wittington	3/13/19	20190313-5219
IND1151	Jim Summers	3/13/19	20190313-5219
IND1152	Joachim Herbig	3/13/19	20190313-5219
IND1153	John Ferrell	3/13/19	20190313-5219
IND1154	Jonathan Salinas	3/13/19	20190313-5219
IND1155	Julia Jorgensen	3/13/19	20190313-5219
IND1156	Katelyn Aguirre	3/13/19	20190313-5219
IND1157	Katie Lavallee	3/13/19	20190313-5219
IND1158	Leslie Wilder	3/13/19	20190313-5219
IND1159	Lucinda Wierenga	3/13/19	20190313-5219
IND1160	Magaly Cornejo	3/13/19	20190313-5219
IND1161	Maria Galasso	3/13/19	20190313-5219
IND1162	Marie Hines	3/13/19	20190313-5219
IND1163	Mario Rodriguez	3/13/19	20190313-5219
IND1164	Michelle Piette	3/13/19	20190313-5219
IND1165	Mike Anderson	3/13/19	20190313-5219
IND1166	Natalia Gonzalez	3/13/19	20190313-5219
IND1167	Ned Sheats	3/13/19	20190313-5219
IND1168	Oscar Rodriguez	3/13/19	20190313-5219
IND1169	Patrick De La Garza Und Senkel	3/13/19	20190313-5219
IND1170	Robert Garcia	3/13/19	20190313-5219
IND1171	Robert Garcia	3/13/19	20190313-5219
IND1172	Robert Radnik	3/13/19	20190313-5219
IND1173	Stephanie Lara	3/13/19	20190313-5219
IND1174	Thomas Nieland	3/13/19	20190313-5219
IND1175	Vanessa Hernandez	3/13/19	20190313-5219
IND1176	Victor Alvarez	3/13/19	20190313-5219
IND1177	William Hoenes	3/13/19	20190313-5219
IND1178	Yvonne Martinez	3/13/19	20190313-5219
IND1179	John Young	2/25/19	20190313-5232
IND1180	Kenneth Teague	4/1/19	20190401-5043

FEDERAL AGENCIES

FA01 NOAA National Marine Fisheries Service, page 1 of 1

FA01-1 Thank you for your comment.

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Southeast Regional Office
263 13th Avenue South
St. Petersburg, Florida 33701-5505
http://sero.nmfs.noaa.gov

February 5, 2019 F/SER46/RS

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

Dear Secretary Bose:

NOAA's National Marine Fisheries Service (NMFS) has reviewed the Essential Fish Habitat (EFH) assessment for the Federal Energy Regulatory Commission (FERC) Annova LNG Brownsville Project (Project docket number (CP16-480-000) dated December 2018. Annova LNG requests authorization to site, construct, and operate a natural gas liquefaction and storage facility, and marine export terminal. The project is located on the Brownsville Ship Channel in Cameron County, Texas.

The EFH assessment was included in section Appendix F of the Draft Environmental Impact Statement (prepared by OEP/DG2E/Gas Branch 3) for the project. The FERC's EFH assessment concludes: "Potential impacts resulting from Project construction and operation are expected to be short-term and highly localized, occurring primarily during construction or shortly thereafter." FA01-1

We have reviewed the information provided and concur that the impacts would be temporary and minor. Therefore, NMFS has no Conservation Recommendations to provide on this project. This concludes the EFH consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act and no further consultation with NMFS is required. If you wish to discuss this project further please contact Mr. Rusty Swafford at (409) 766-3699 or at Rusty.Swafford@noaa.gov.

Sincerely,

Virginia M. Fay
Assistant Regional Administrator
Habitat Conservation Division

c:
F/SER46, Swafford
F/SER4, Dale
Files

Margaret Brown, Corpus Christi, TX.

In the Draft EIS, Volume I, Section ES-3, it is stated, "The Coast Guard Letter of Recommendation estimated an average of 2 to 6 LNG carriers per month would call on the terminal, up to a maximum of 80 carriers per year. Therefore, some of the impact analyses found in this EIS (e.g., the air quality impact assessment) used 80 LNG carriers per year to ensure a conservative estimate of impacts." On January 14 of 2019, It was brought to the attention of the Coast Guard by Mr. Tom Rodino of Rodino Inc., that the actual vessel arrivals annually may be greater than 80 LNG carriers per year. FA02-1

-LCDR Margaret Brown, US Coast Guard Sector/ Air Station Corpus Christi, TX

FA02 U.S. Coast Guard, page 1 of 1

FA02-1 Thank you for your comment. In its comments on the draft EIS Annova requested that we evaluate the maximum potential of 125 LNG carriers per year. The final EIS has been revised.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

March 11, 2019

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

Dear Ms. Bose:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the Annova LNG Brownsville Project liquefied natural gas (LNG) export terminal in Cameron County, Texas (Annova LNG Project), Docket No. CP16-480-000, CEQ No. 20180317, pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500 – 1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The proposed action consists of a new natural gas liquefaction and LNG export terminal located in Cameron County, near Brownsville, Texas, and has two principal parts: the LNG facilities and associated marine transfer facilities. The EPA is a cooperating agency for this project.

We appreciate the opportunity to review this draft EIS. The EPA has no comments on the project as proposed. Please note that effective October 22, 2018, the EPA no longer includes ratings in our comment letters. Information about this change is explained in the Memorandum on Changes to EPA's Environmental Review Rating Process, available at https://www.epa.gov/nepa/policy-and-procedures-review-federal-actions-impacting-environment-under-section-309-clean-air. If you have any questions, please contact Magda Dallemagne, the lead contact for this project, at (214) 665-7396 or dallemagne.magdeleine@epa.gov. FA03-01

Sincerely,

Cheryl T. Seager
Director
Compliance Assurance and
Enforcement Division

ec: Eric Tomasi, FERC, eric.tomasi@ferc.gov
John Peconom, FERC, john.peconom@ferc.gov
John Crookston, Tetra Tech, john.crookston@tetratech.com
John Scott, Tetra Tech, john.scott@tetratech.com

FA03 U.S. Environmental Protection Agency, page 1 of 1

FA03-01 Thank you for your comment.

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
1001 Indian School Road NW, Suite 348
Albuquerque, New Mexico 87104

9043.1
PEP/NRM

ER 18/0586

March 13, 2019

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

Re: Annova LNG Brownsville Project - Draft Environmental Impact Statement (DEIS), Cameron County, Texas, FERC No. CP16-480-000

Dear Secretary Bose:

The U.S. Department of the Interior (Department) has reviewed the December 2018 draft EIS by Federal Energy Regulatory Commission (FERC) regarding authorization for Annova (collectively Annova LNG Common Infrastructure, LLC; Annova LNG Brownsville A, LLC; Annova LNG Brownsville B, LLC; and Annova LNG Brownsville C, LLC) to site, construct and operate facilities to liquefy and export natural gas at a terminal facility along the Brownsville Ship Channel (BSC), in Cameron County, Texas. Department bureaus U.S. Fish and Wildlife Service (FWS) and National Park Service (NPS) are participating as cooperating agencies with FERC for this EIS process. We are all committed to working collaboratively with FERC and Annova LNG and offer the following comments for use in the development of the Final Environmental Impact Statement (FEIS) for the subject project.

This letter has been prepared under the authority of and in accordance with provisions of the National Environmental Policy Act (NEPA) of 1969 (42 USC 4321 *et seq.*), the Endangered Species Act (ESA) of 1973, as amended (16 USC 1531 *et seq.*), the Fish and Wildlife Coordination Act (16 USC 661-667e), the National Wildlife Refuge System Improvement Act of 1997 (PL 105-57), the Migratory Bird Treaty Act (MBTA) (16 USC 661-667e), the Historic Sites Act of 1935 (16 USC 461-467), the National Historic Preservation Act (NHPA) (PL 89-665, as amended by PL 96-515), and other authorities mandating the Department's concern for environmental and historic preservation values.

1

Fish and Wildlife Service

General Comments

Three Federally Endangered species (ocelot, jaguarundi, and northern aplomado falcon) habitats are becoming more limited across South Texas and within the proposed project area, and continue to be fragmented and disconnected. The Annova project is proposing to remove a large piece of ocelot habitat within the Ocelot Coastal Wildlife Corridor. The text in the beginning of the DEIS ("To the Interested Party") states that with the mitigation measures recommended in the EIS and Annova's proposed mitigation measures, impacts in the Project area would be avoided or minimized and would not be significant. It is FWS' opinion that the Annova project will impact part of a loma with ocelot habitat that is irreplaceable and cannot be restored or recreated. Also, this project impacts indirectly affects National Wildlife Refuge (NWR) property. FA04-01 FA04-02

To reduce these significant impacts, FWS recommends that Annova establish perpetual conservation easements and perfect final agreements with Brownsville Navigation District (BND) for the proposed wildlife corridors on the western side of the proposed project wall (181 acres), and the Puerta de Trancas Loma to the north of the Brownsville Ship Channel (BSC). FWS requests that these conservation easements consist of a 1,000-foot-wide easement encompassing three tracts of land extending from State Highway (SH) 48 southerly right-of-way (ROW) line to the BSC (42 acres), and the perpetual conservation easement (189 acres) that parallels the proposed Alternative 2 access road with a right of way that goes through the Lower Rio Grande Valley NWR. FA04-03

The USACE permit and the FERC DEIS should use the same wetlands baseline. In comparing the wetlands information provided in the DEIS with that given in the U.S. Army Corps of Engineers (USACE) Public Notice of December 27, 2018, for the Annova Section 10 and Section 404 permit application (SWG-2015-00110) for construction and operation of the proposed Annova LNG Project, FWS has a concern that the wetlands at the facility have been incorrectly characterized, and recommends to USACE that the delineation be reviewed (see also February 12, 2019, letter from FWS to USACE on the Public Notice). FA04-04

Specific Comments - FWS

***To the Interested Party, paragraph 2**: "In addition, the Annova LNG Project combined with other projects within the geographic scope, including the Texas LNG and Rio Grande LNG Projects, would result in certain significant cumulative impacts."* FA04-05

FWS agrees with the above statement. There is less than 5% of the federally endangered ocelot and jaguarundi habitat left in the Rio Grande Valley, and the cumulative impacts from these three proposed projects and previous projects have substantially reduced wildlife corridors, areas for sheltering and reproduction due to fragmented ocelot and jaguarundi habitat and loss of connectivity needed for the recovery of the species.

2

FA04 continued, page 2 of 19

FA04-01 Comment noted. The letter to the interested parties has been revised to indicate that impact on some resources would remain significant.

FA04-02 Comment noted. The letter to the interested parties has been revised to acknowledge impact on the adjacent NWR.

FA04-03 On March 15, 2019 we requested that Annova provide a response to this FWS recommendation. In its March 25, 2019 response (FERC accession number 20190325-5179) Annova stated that it cannot commit to a perpetual conservation easement as a lessee to the BND because Annova does not own or control the property. If the Project continues to operate beyond the term of the existing lease, Annova can commit to extend the term of those existing conservation easements. If the FWS grants the right-of-way for the use of proposed access road, Annova would not develop the alternative access road location (see section 3.5), in which case Annova has committed to work with the BND to establish a new conservation easement on BND property that would protect dense thornshrub habitat on the 189-acre area that encompasses Loma de la Jauja. See updated section 4.7.1.2 of the final EIS.

FA04-04 Based on this and similar comments received from others we have requested that Annova provide clarification of the apparent differences in wetlands reported. In its response filed on March 25, 2019 (FERC accession number 20190325-5179) Annova clarified that initial emergent wetlands on site were classified as freshwater (palustrine) emergent, but after consultation with the COE these wetlands were reclassified as estuarine emergent. See also updated section 4.4.1 of the final EIS.

FA04-05 Thank you for your comment.

Project Impacts, ES-3, paragraph 2: *"Overall, construction of the Project facilities would temporarily disturb approximately 550 acres for construction. About 412 acres of the areas disturbed during construction would either contain permanent facilities or be permanently maintained as either concrete, paved, or gravel surfaces, or maintained in an herbaceous state."* FA04-06

FWS recommends that the term "temporarily" be deleted from the sentence, or the text specify that 412 acres of 550 acres be noted as permanently impacted, and 138 acres as temporarily disturbed.

Vegetation 11, ES-5: *"No state-designated vegetation communities of special concern (including rare, threatened, or endangered plants) occur in the Project area. Although approximately 409 acres of vegetation communities would be permanently lost, with implementation of Annova's minimization and mitigation measures, including implementation of measures within its Conceptual Mitigation Plan, we have determined that construction and operation of the Project would not significantly impact vegetation."* FA04-07

FWS considers thornscrub areas used by ocelot and jaguarundi, and coastal salt prairie habitat used by the northern aplomado falcon, to be of special concern, as they are limited (less than 5% remain) and will be impacted by these proposed projects.

Wildlife and Aquatic Resources, ES-6, paragraph 2: *"In accordance with Service's recommendations, Annova would attempt to limit clearing on the Project site to between September 1 through February 28 to avoid impacts on migratory bird nesting. We recommend that prior to construction Annova consult with the Service to develop a Project-specific Migratory Bird Plan to include measures to avoid and minimize impacts on migratory birds, and that the Migratory Bird Plan should include details from the Facility Lighting Plan that are intended to reduce impact on wildlife and birds."* FA04-08

FWS looks forward to coordinating with the applicant on their proposed migratory bird plan and a facility lighting plan, and appreciates FERC's support for the development of these documents prior to the initiation of construction.

Regarding the statement of clearing timeframes above, FWS noted that Appendix B of this DEIS, Section 3.9 (Upland Erosion Control, Revegetation, and Maintenance Plan), states that no winter construction is anticipated due to the humid subtropical climate of Brownsville. FWS requests that the clearing timeframes in the Executive Summary be changed to match Appendix B.

Reliability and Safety, ES-9-10, paragraph 3: *"We are including specific recommendations to address potential impacts from rocket launch failures on the Project. However, the extent of impacts on SpaceX operations, the National Space Program, and to the federal government would not fully be known until SpaceX submits an application with the FAA requesting to launch and whether the LNG terminal is under construction or in operation at that time."* FA04-09

FWS recommends a reference to the location in FERC documents of the specific recommendations referenced in the sentence above, or clarifying whether all FERC

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FA04 continued, page 3 of 19

FA04-06 Comment noted. The referenced text has been revised in the executive summary to indicate that 550 acres would be disturbed during construction.

FA04-07 The referenced text in the executive summary has been revised to acknowledge the importance of dense thornscrub and coastal salt prairie.

FA04-08 Thank you for your comment. We have maintained the dates of the FWS-recommended clearing window because the defined dates are easier to implement than the general season of "winter", however section 4.6.1.2 of the final EIS has been revised to mention that no winter construction is anticipated, in addition to the discussion of the FWS-recommended clearing window.

FA04-09 FERC staff recommendations related to SpaceX are included in section 4.12.6 of the EIS, as well section 5.2 which lists all recommendations made in the EIS.

recommendations for impacts from rocket launch failures will be deferred until SpaceX has submitted its application to the Federal Aviation Administration (FAA). FA04-09 Cont'd

Cumulative Impacts, ES-10, paragraph 1: *"As part of that assessment, we identified existing projects, projects under construction, projects that are proposed or planned, and reasonably foreseeable future projects – including proposed LNG terminals, currently operating and future oil and gas projects, land transportation projects, commercial and industrial developments, and dredging projects. Reasonably foreseeable projects that might cause cumulative impacts in combination with the proposed Project include the Rio Grande LNG Project and the Texas LNG Project. Many of the identified cumulative impacts would be temporary and minor."* FA04-10

FWS believes cumulative effects from existing projects and the proposed LNG terminals contribute to the net loss, and with less than 5% of ocelot, jaguarundi, and northern aplomado falcon habitat remaining, effects will be permanent and significant.

Alternatives Considered, ES-13, paragraph 5: *"Based on our analysis of alternative flare designs, we conclude that a Totally Enclosed Ground Flare design would not result in a significant environmental advantage over the proposed combined warm/cold flare stack."* FA04-11

FWS recommends that the preferred flare design, including analysis of alternative designs, be included in the applicant's Migratory Bird Plan proposed to be developed in consultation with them.

Conclusions, ES-13, paragraph 1: *"We determined that construction and operation of the Annova LNG Project would result in some unavoidable adverse environmental impacts. We conclude that impacts on the environment from the proposed Project would be reduced to less than significant levels with the implementation of Annova's proposed impact avoidance, minimization, and mitigation measures and the additional measures recommended by FERC staff."* FA04-12

FWS believes that Annova has worked to lessen the environmental effects to ocelots, but with less than 5% of ocelot and jaguarundi habitat left in the Rio Grande Valley, the effect is still significant. Annova is one of three liquified natural gas (LNG) lines being proposed and there are cumulative impacts from these three proposed projects, as well as previous projects that have substantially reduced wildlife corridors, areas for sheltering and reproduction due to fragmented ocelot and jaguarundi habitat, and loss of connectivity needed for the recovery of the species. FWS requests that Annova confirm mitigation measures for the proposed wildlife corridor on the western side of the proposed project wall (181 acres), the conservation easement north of the BSC (42 acres), and the perpetual conservation easement (189 acres) that parallels the proposed Alternative 2 access road with a ROW that goes through the Lower Rio Grande Valley National Wildlife Refuge.

1.4.1 Natural Gas Supply Lateral, 1-13, paragraph 1: *"The approximately 9-mile-long, 36-inch-diameter natural gas supply lateral would begin at an existing Valley Crossing compressor station north of Highway 48 within the boundary of the Port of Brownsville, cross the BSC, and*

4

FA04 continued, page 4 of 19

FA04-10 We have revised the referenced section of the executive summary and section 4.13.3.5 of the EIS to conclude that cumulative impacts on the aplomado falcon are significant.

FA04-11 Our recommended Migratory Bird Plan would address the proposed facilities, including the proposed flare design. We do not agree that it would be appropriate to include alternative facility designs within the Migratory Bird Plan.

FA04-12 See response to comment FA04-3.

continue generally south and then east to the Project site. The supply lateral would be an intrastate pipeline and therefore would not be under the FERC's jurisdiction." FA04-13

FWS requests that that the applicant confirm plans to directionally drill the pipeline in the same manner as the Valley Crossing Pipeline between SH4 and the facilities to avoid impacts to the loma. Additionally, FWS recommends that Annova and they proceed with development of a perpetual conservation easement with BND to protect the ocelot and jaguarundi habitat which would be avoided if access road (Alternative 2) is selected because use of the other proposed access road alternatives would impact wildlife corridor habitat. FWS requests that the applicant provide an analysis of the cumulative impacts of the natural gas supply pipeline in the Biological Assessment for evaluation in its Biological Opinion.

Electric Transmission Line and Switchyard, 1-16, paragraph 3, and Figure 1.4.3-1: *"The new 138-kV transmission line would be approximately 15 miles long. The poles supporting the transmission line wires would be 90 to 110 feet in height and spaced approximately 600 feet apart within a right-of-way width of about 100 feet."* FA04-14

The electric transmission line as indicated in Figure 1.4.3-1 goes through loma habitat that has been proposed to be avoided and protected by a perpetual conservation easement, in the development of the access road, in Alternative 2. FWS recommends moving the transmission line north to avoid impacting ocelot habitat in the proposed perpetual conservation easement.

Potable Water Pipeline, 1-16, paragraph 1, and Figure 1.4.4-1: *"The new water pipeline would be an extension of an existing water pipeline and would be about 5.9 miles long."* FA04-15

The potable water pipeline has the same alignment as the above pipeline between SH 4 and the facilities that will go through the proposed perpetual conservation easement with BND to protect the jaguarundi and ocelot habitat for the use of the Lower Rio Grande Valley National Wildlife Refuge (LRGVNWR) access road (Alternative 2) ROW. The Service recommends either the potable pipeline be directionally drilled for the length of the loma, or that the line be moved to the north, to avoid ocelot habitat impacts to the proposed perpetual conservation easement.

2.1.8 Access Road, 2-7, paragraph 1: *"Annova anticipates that two, 12-foot-wide paved travel lanes would be required to accommodate regular two-way industrial traffic, including tractor-trailers. Each side of the road would also have a 10-foot-wide gravel shoulder able to accommodate a disabled tractor-trailer without blocking incoming or outgoing traffic. In total, this would result in a 157-foot-wide construction impact, and a 137-foot-wide operational impact for the access road."* FA04-16

In consultation with FWS under ESA, the applicant will need to specify the wildlife crossings, size of crossings, and fencing to be placed on this road to minimize road kill of ocelots and other wildlife. The construction and operational width of disturbance needs to be reduced as much as possible. FWS recommends that any ocelot habitat disturbance be addressed in the Biological Assessment, and mitigated as ocelot habitat acres impacted. It recommends that dense ocelot habitat be established or revegetated on the loma side leading up to the wildlife crossings.

5

FA04-13 Because the natural gas supply lateral pipeline would be FERC non-jurisdictional, we are not making a recommendation in the EIS for how the pipeline would be installed. Specific installation methods may be included with the Section 404/10 permit authorization if issued by the COE. The non-jurisdictional supply lateral pipeline, along with other non-jurisdictional facilities, is addressed in the cumulative effects analysis in section 6.0 of the BA that was transmitted to the FWS on February 15, 2019. With regard to conservation easements, see response to comment FA04-3.

FA04-14 See response to comment FA04-3.

FA04-15 See response to comment FA04-3.

FA04-16 Annova has stated that it is working with the FWS to develop wildlife crossings along the access road. Ocelot habitat that would be affected by the access road is addressed in our BA that was transmitted to the FWS on February 15, 2019. Annova has not proposed this specific measure but has stated that it would continue to consult with the FWS regarding potential impacts on the ocelot and jaguarondi and potential measures to mitigate for those impacts. This measure can be included during review of the BA.

3.5. Access Road Alternatives, 3-18, paragraph 6: *"Based on the overall analysis of these criteria and the minimization of impacts on waterbodies, wetlands, and biological resources, we believe that neither Access Road Alternative 1 nor 3 would provide a significant environmental advantage over the proposed access road. However, use of the proposed access road would require an appropriateness determination and a compatibility determination from the FWS."* FA04-17

FWS agrees with the plan to pursue Access Road (Alternative 2) for the Annova Project; however, it will be seeking a perpetual conservation easement for protection of the brush habitat avoided by this alternative, as well as protection from impacts on this same habitat by the installation of the proposed freshwater pipeline and power line to the facility.

General Impacts and Mitigation, 4-3, paragraph 1: *"The Project site would be graded to the extent necessary to construct Project facilities including grading of all but the northeast and southwest portions of Loma Del Potrero Cercado. As a result, the LNG facilities would not alter the existing geologic conditions at the site. The final Project site would include asphalt-surfaced roads, gravel-surfaced roads, general gravel surfacing, and application of top soil, seed, and mulch for planned vegetated areas."* FA04-18

FWS believes destruction of the loma habitat would destroy the essential geologic and ecological conditions of this site. Creation of high quality functional loma habitat is likely impossible.

4.2.1.4 Revegetation Potential, 4-6, paragraph 1: *"The revegetation potential for soils within the Project site is generally poor, as shown in table 4.2.1-1. The revegetation potential of soils is only a concern outside of the footprint of permanent Project facilities where Annova would conduct revegetation efforts."* FA04-19

FWS recommends that revegetation be monitored for 5 years to ensure the sites are successfully revegetated.

4.4.1 Existing Wetland Resources, 4-28, paragraph 1: *"Wetlands delineated within the Project site include estuarine open water; unvegetated tidal flat; estuarine emergent marsh, and estuarine scrub-shrub ..."* FA04-20

This statement contradicts descriptions of the wetland impacts elsewhere in the DEIS. For example, on page 4-276, it is noted that "Wetlands that would be affected by the Project include estuarine emergent marsh, estuarine scrub-shrub (mangrove) marsh, and palustrine emergent wetlands. Most of these impacts would be to palustrine emergent wetlands. "

As noted under General Comments, FWS recommends that the delineation documentation be reviewed and the descriptions of the wetland habitat types that would be impacted by the project be described consistently throughout the document. FA04-21

Figure 4.4.2-1 Wetlands Affected by Construction and Operation of the Project, 4-30: FA04-22

The types and amounts of wetlands in the DEIS changed from the previous version, Figure 2.4-1 Wetlands and Non-Wetland Waterbodies on the Project Site, provided in Resource Report 2,

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FA04-17 Comment noted. See also response to comment FA04-3.

FA04-18 Section 4.1.5 of the final EIS has been revised to state that grading would impact the surface geology of the site.

FA04-19 In accordance with Annova's Plan, monitoring of revegetated areas that are disturbed by construction would occur at a minimum after the first and second growing seasons following construction, but would continue until all disturbed areas were determined to be successfully revegetated. See section 5.4 of Annova's Plan included in appendix B of this EIS.

FA04-20 Comment noted. Section 4.13.3.3 of the final EIS has been revised to remove the statement that mangrove wetlands would be impacted by the Project. Annova modified its proposed site plan to avoid direct impact on mangrove wetlands.

FA04-21 See response to comment FA04-4.

FA04-22 See response to comment FA04-4.

July 2016 (RR2). The large palustrine features are labeled as Estuarine Emergent in the DEIS version, and only those wetlands that are to be directly impacted by the construction of the facility are shown on DEIS Figure 4.4.2-1. FA04-22 Cont'd

FWS recommends that wetlands anticipated to be temporarily impacted, or avoided by direct impacts, be mapped and monitored, and if construction and operation impacts occur that are not avoidable or temporary, it recommends additional mitigation.

Table 4.5.2-1 Vegetation Communities Affected by Construction and Operation of the Project, 4-35: FA04-23

FWS believes that this table, as the data are currently reported, presents an incomplete picture of the effects of the project on vegetation communities within the applicant's project area. FWS recommends that a complete accounting of the vegetation communities present, and the anticipated impacts on them, be presented. FWS recommends that Coastal Salt and Brackish High Tidal Marsh, identified as 10 acres in Section 4.5.1.1; and Coastal Mangrove, identified as 2 acres in Section 4.5.1.4, be added to the Vegetation Community Column. Additionally, columns for Total Present in the Project area (acres), Temporary Impacts (acres), and Permanent Impacts (acres) be added with the Construction Impacts (acres) and Operation impacts (acres) columns presently shown. This will provide a clearer picture of acres that should be restored and monitored for restoration success, as well as acres avoided from direct impacts, but monitored to ensure that no indirect adverse impacts have occurred.

4.5.5 Conclusion, 4-37, paragraph 1: *"Although approximately 409 acres of vegetation communities would be permanently lost, the region contains large quantities of similar vegetation communities. Therefore, we have determined that construction and operation of the Project would not significantly impact vegetation."* FA04-24

The presence of additional habitat within the project area does not discount a cumulative impact to ocelot and northern aplomado falcon habitats. The three proposed LNGs will fragment remaining habitat and it is difficult to maintain functionality without protecting the remaining <5%. This information is needed for the Biological Opinion to show off site conservation strategies to compensate for the net loss of habitat and loss of connectivity.

Impacts and Mitigation, 4-39, paragraph 5: *"Although construction would permanently remove wildlife habitat, ample undisturbed habitat is available in the vicinity of the Project site ... some habitat within the fenced boundaries would only be temporarily disturbed and vegetation would be allowed to revert to pre-existing land covers after construction. Fencing and wildlife crossings along the access road and establishment of speed limits is expected to reduce the possibility of vehicle collisions."* FA04-25

Wildlife habitat is present in the project area and should be protected from effects of the operational activities of the facility, now and into the future. Restoration efforts will need to address invasive grasses coming in behind the clearing. A plan to control invasive grasses, possibly with chemical treatment, to allow native vegetation to grow needs to be developed.

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FA04-23 The vegetation types described in section 4.5.1.1 are part of the existing environment within the overall project site, including areas that would not be disturbed by construction. The purpose of table 4.5.2-1 is to identify vegetation that would be directly affected by Project construction and operation. We do not agree that vegetation types that would not be affected should be added to table 4.5.2-1.

FA04-24 The referenced text is specific to impacts from just the Annova LNG Project. Cumulative impacts, including from the three proposed LNG projects, are evaluated elsewhere, in section 4.13 of the EIS.

FA04-25 Annova's Plan includes standards for establishing successful revegetation of areas of the Project site that would be disturbed during construction, and standards to determine when disturbed areas can be considered successfully revegetated following construction. Those standards include consideration for minimizing presence of invasive species in order to determine that areas are successfully revegetated. With regard to wildlife crossings along the access road, see response to comment FA04-16.

Also, FWS will need details on number of proposed wildlife crossings, size of crossing, and fencing in its biological assessment (BA), so it can be included in the Biological Opinion. FA04-25 Cont'd

Unique and Sensitive Wildlife, National Wildlife Refuges and Preserves, Loma Ecological Preserve 4-44, paragraph 1: *"To facilitate preservation of the wildlife corridor, the Service has agreed to terminate their lease for this additional area upon construction of the project."* FA04-26

BND notified FWS that they intend to withdraw the acreage from the agreement in order to build the Annova facilities. FWS has no recourse under the lease agreement. We believe this will impact wildlife movement through this wildlife corridor, including ocelots and jaguarundi.

4.6.1.2, Unique and Sensitive Wildlife, National Wildlife Refuges, South Texas Coastal Corridor, 4-47, paragraph 3: *"Annova would maintain a wildlife corridor on the west side of the Project site, where existing dense thornshrub and other habitats would be avoided and preserved. Annova would protect the wildlife corridor with a conservation easement for the life of the Project. In addition, Annova would install a barrier wall along the southwest edge of the site between the LNG terminal facilities and the wildlife corridor to reduce light and noise impacts on wildlife."* FA04-27

Annova would need to protect the wildlife corridor with a conservation easement in perpetuity and not just for the life of the project. After the life of the project, the loss of habitat is still permanent and a net loss.

4.7.1.2, Impacts and Mitigation: Terrestrial Mammals, 4-65 and 4-66, paragraph 1: *"Constructing and operating the Project would result in the loss of suitable ocelot and jaguarundi habitat, which could affect their movement resulting in avoidance and displacement. The Project would result in the permanent loss of 127 acres of Loma Evergreen Shrub/and, which is considered preferred habitat for ocelots and jaguarundis. Because this habitat is part of the South Texas Coastal Corridor identified by the Service, this habitat loss could decrease the effectiveness of this habitat linkage (resulting in habitat fragmentation) and affect the ability of ocelots to use this area as a potential travel corridor. To address this impact and as discussed further below, Annova designed the Project layout to include an undisturbed wildlife corridor on the Project's western boundary."* FA04-28

The wildlife corridor proposed on the western boundary north of the ship channel and loma is where the Alternative 2 road access is proposed. A perpetual conservation easement agreement is recommended, to ensure this area continues functioning as a wildlife corridor.

4.7.1.2, Impacts and Mitigation: Terrestrial Mammals, Time Extension of Existing Redhead Ridge Conservation Easement, 4-66 and 4-67, paragraph 1: *"Annova is working with the BND to extend the duration of an END-owned conservation easement located on the north side of the BSC (Puerta de Trancas Loma) ...Currently, the conservation easement is scheduled to expire in September 2023. If approved by the BND, Annova is proposing to extend the conservation easement for the life of the Project in order to connect the proposed wildlife corridor on the west side of the Project site to additional conservation lands further north."* FA04-29

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FA04-26 Comment noted. The referenced text in section 4.6.1.2 of the final EIS has been revised.

FA04-27 See response to comment FA04-3.

FA04-28 See response to comment FA04-3.

FA04-29 See response to comment FA04-3.

This conservation easement should be included in the EIS and will be analyzed in our Biological Opinion. FWS recommends that Annova protect the wildlife corridor with a conservation easement in perpetuity to offset the impacts of the project. After the life of the project, the loss of habitat is still permanent and a net loss. FA04-29 Cont'd

4.7.1.3, Impacts and Mitigation: Northern Aplomado Falcon, 4-68, paragraph 5: *"A safe harbor program was initiated in 1996 that provides landowners, including the BND, a safe harbor (i.e., permission to cause incidental take of the northern Aplomado falcon at the Project site, so long as the level of incidental take does not cause the Action Area's environmental baseline for the northern Aplomado falcon to fall below conditions existing at the time BND became a sub-permittee). The Permit defines the environmental baseline for the northern Aplomado falcon as the pair of northern Aplomado falcons that was bred in captivity and that nested in the Brownsville area in 1995. As no northern Aplomado falcon nests existed within the Project site at the time BND became a sub-permittee under the Permit, any incidental take associated with the Project would be covered under the Safe Harbor Agreement."* FA04-30

The northern aplomado falcon is already covered for take under the Endangered Species Act (ESA) by a 99-year Safe Harbor Agreement and associated ESA Section 10(a)1(b) permit that allows development to occur in the area around the Port of Brownsville. However, we encourage northern aplomado falcon habitat conservation across the landscape. These falcons typically occur in coastal prairie or savanna grasslands containing low-growing salt-tolerant plants such as sea oxeye daisy and with scattered, but prominent woody vegetation such as yuccas or mesquites. Northern aplomado falcons have been documented specifically within the area of Laguna Atascosa National Wildlife Refuge (NWR) and on eastern Cameron County tracts of the Lower Rio Grande Valley NWR.

For this section of the DEIS, FWS recommends that the last two sentences be replaced with the following: "The baseline responsibilities for BND under the Safe Harbor permit are one pair of northern aplomado falcons, which was determined at the time they signed a Cooperative Agreement and received a Certificate of Inclusion from the Peregrine Fund. Therefore, BND's obligations are to maintain one nesting pair. In addition, they would give the Peregrine Fund advance notice and an opportunity to salvage any nestlings and/or eggs during the breeding season for any activities that may result in incidental taking of northern aplomado falcons on BND property." FA04-31

4.7.1.3, Impacts and Mitigation: Northern Aplomado Falcon, 4-69, paragraph 6: *"Although northern Aplomado falcons have been documented in and near the Project site, no nests have been documented at the Project site. This species is highly mobile and typically departs at the approach of humans. In addition, Annova would implement measures, including minimization of impacts on suitable nesting habitat as well as clearing outside the nesting season or otherwise conducting nest surveys prior to construction. Therefore, we have determined that constructing and operating the Project may affect, but is not likely to adversely affect the northern aplomado falcon."* FA04-32

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FA04-30 Comment noted. The referenced text in section 4.7.1.3 of the final EIS has been revised to add that FWS encourages conservation of northern aplomado falcon habitat.

FA04-31 The requested change has been made to section 4.7.1.3 of the final EIS.

FA04-32 Cumulative impacts on the apomado falcon are considered and evaluated, see section 4.13.3.5 of the EIS.

FWS recommends that all cumulative habitat impacts within the project area such as loss of habitat from existing and proposed wind energy projects, Space X, all of the proposed LNG's, the proposed Second Causeway, and the South Port Connector road be considered. FA04-32 Cont'd

***4.7.1.3, Impacts and Mitigation: Eastern Black Rail, 4-75, paragraph 4**: "Although suitable eastern black rail habitat would be permanently affected as a result of the Project, there is abundant estuarine marsh habitat that would remain undisturbed in the vicinity of the Project site. Therefore, we have determined that constructing and operating the Project would result in no effect on this species."*

FWS requests that more information be included to support the language that there is abundant habitat available for the eastern black rail in the project area, including an estimate of the acres available, if possible, and whether an assessment was made of cumulative impacts (how much habitat has been lost) to this species. FA04-33

***Figure 4.11.2-1 Noise Sensitive Areas and Noise Monitoring Locations**:* FA04-34

FWS recommends that the noise analysis include establishing a Noise Sensitive Area site in the habitat on the southwest side of the project area, which Annova has committed to avoid during construction of their facility.

***4.13.2.1, Non-jurisdictional Facilities Associated with the Annova LNG Project, Natural Gas Supply Lateral Pipeline, 4-260, paragraph 1**: "Construction of the natural gas supply lateral would affect about 110 acres of land, all of which would be located within Cameron County, and result in a permanent footprint of about 50 acres within the right-of-way."* FA04-35

FWS requests that a detailed description of the impacts of this feature include acres of each habitat type proposed to be impacted by the natural gas pipeline's construction. Additional details of the approximately 55 acres of temporarily impacted habitat should be provided including habitat type and restoration methodologies.

***4.13.2.1, Non-jurisdictional Facilities Associated with the Annova LNG Project, Transmission Line and Switchyard, 4-262, paragraph 2**: "The new 138-kV transmission line from the existing substation to the Project site would be approximately 15 miles long and supported by poles 90 to 110 feet high and spaced approximately 600 feet apart. The initial design calls for a right-of-way width of 100 feet."* FA04-36

FWS requests that a detailed description of the impacts of the power line include acres of each habitat type proposed to be impacted by the construction of this feature.
Additional details of the temporary impacts should be provided including habitat type and restoration methodologies to be used.

***4.13.2.1, Non-jurisdictional Facilities Associated with the Annova LNG Project, Potable Water Pipeline, 4-262, paragraph 1**: "The total length of the potable water pipeline would be about 5.9 miles. Annova identified a potential route for the water pipeline for the purpose of describing non-jurisdictional facilities and evaluating cumulative impacts. See figure 1.4.4-1."*

FA04-33 We have updated section 4.7.1.3 with reference to National Wetlands Inventory mapping which shows abundant palustrine emergent marsh in the vicinity of the proposed site. Cumulative impacts on this species are addressed in section 4.13.3.5 of the EIS.

FA04-34 The analysis of noise from construction and operation includes estimates of sound levels from points within the proposed wildlife corridor. Predicted maximum construction noise within the corridor would range from 55 to 60 dBA Ldn and the wildlife corridor area could temporarily experience sound levels between 85-100 dBA L_{max} when pile-driving takes place, depending upon the number of simultaneous piles and the location on the construction pad. Predicted sound levels in the wildlife corridor during operation would range from 50 to 65 dBA L_{dn}. Annova would construct a 25-foot-tall concrete barrier wall on the western side of the site as part of the proposed wildlife corridor, which would further reduce sound transmission beyond the property boundary to the southwest, so sound levels to the southwest within the wildlife corridor would likely be less than those predicted. See also sections 4.7.1.2 and 4.11.2 of the EIS. We have included a recommendation in section 4.11.2 of the EIS limiting pile driving to daytime only.

FA04-35 As required under NEPA, we have reported available information regarding the non-jurisdictional natural gas supply lateral pipeline. The detail requested by the FWS is not available at this time.

FA04-36 See response so comment FA04-35.

FWS requests that a detailed description of the impacts of the potable water pipeline, including acres of each habitat type proposed to be impacted by the construction of this feature be provided. Additional details of the temporary impacts should be provided, including habitat type and restoration methodologies to be used. FA04-37

***4.13.3.3, Wetlands and Vegetation, Wetlands 4-277, paragraph 7**: "Therefore, while the proposed LNG Terminal would contribute to cumulative impacts on wetlands, along with other projects in the area, this impact would not be significant."* FA04-38

FWS believes that wildlife in the hydrologic unit code (HUC) cannot access other wetlands if excluded from the wetlands impacted by the project.

***4.13.3.3, Wetlands and Vegetation, Vegetation, 4-277, paragraph 2**: "About 407 acres of upland vegetation would be affected during construction of the Annova LNG Project. Most of these impacts would be to the following vegetative communities: South Texas: Loma Evergreen Shrub/and; Gulf Coast: salty prairie; South Texas: Loma Grassland/Shrub/and; and Coastal: Sea Ox-eye Daisy Flats. Temporary workspaces would be replanted with native grasses with the goal of restoring grassland/herbaceous wildlife habitat."* FA04-39

FWS does not believe that this replanting would adequately replace lost native habitat.

***4.13.3.3, Wetlands and Vegetation, Vegetation, 4-277, paragraph 2**: "No state- designated vegetation communities of special concern (including rare, threatened, or endangered plants) occur on the Project area."* FA04-40

Tamaulipan thornscrub is a rare and threatened habitat with less than 5% left in the Rio Grande Valley. In addition, northern aplomado falcon habitat, salty prairie and sea ox-eye daisy flats habitat, is very limited and has been impacted by wind energy projects along with the three proposed LNGs.

***4.13.3.5, Special Status Species, Terrestrial Mammals, Ocelot and Jaguarundi, 4- 283, paragraph 4**: "Not all of the projects listed above are anticipated to impact ocelot and jaguarundi habitat, such as the San Roman Wind Farm, which is located in primarily agricultural and open land, and the Port of Brownsville projects, which are located within densely developed, previously disturbed areas."* FA04-41

The San Roman wind energy project is constructed within the Ocelot Coastal Wildlife Corridor just north of SH 100. The Annova project could change the ocelot movement between Laguna Atascosa NWR and Bahia Grande, due to its location within the corridor.

***4.13.3.5, Special Status Species, Terrestrial Mammals, Ocelot and Jaguarundi, 4- 284, paragraph 5**: "The current remaining habitat corridor in the region to connect U.S. and Mexico populations is located adjacent to and within the proposed Rio Grande LNG and Texas LNG sites north of the BSC and within the proposed Project site south of the BSC. The area adjacent* FA04-42

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FA04-37 See response so comment FA04-35.

FA04-38 Comment noted. We have revised section 4.7.1.2 to include additional evaluation of the South Texas Coastal Corridor.

FA04-39 Thank you for your comment. The referenced statement is not meant to imply that replanting temporarily disturbed habitat would replace other habitat that is permanently lost.

FA04-40 The referenced statement has been removed from the referenced section of the EIS.

FA04-41 The referenced text has been modified as suggested by removing reference to the San Roman Wind Farm.

FA04-42 See response to comment FA04-3.

to the proposed Rio Grande LNG Project site is a conservation easement that will not be developed in the future." FA04-42 cont'd

FWS requests that this conservation easement, which is set to expire in 2023, be in perpetuity to have a viable wildlife corridor. If this conservation easement is made for the life of the project, then this area may be developed once Annova leaves the area.

***4.13.3.5, Special Status Species, Birds, 4-285, paragraph 1*:** FA04-43

FWS recommends that the eastern black rail, a species proposed for ESA listing, be added to this list.

***4.13.3.5, Special Status Species, Birds, 4-285, paragraph 5*:** *"The Port of Brownsville projects are primarily located in an already industrialized area that likely does not provide suitable habitat for northern Aplomado falcon."* FA04-44

The area does provide suitable habitat. FWS recommends a change to the language to reflect that though there is some industry in the BND area, Annova is impacting 186 acres, Rio Grande LNG is impacting 191.5 acres, and Texas LNG is impacting 168.7 acres for a total of 546.2 acres of suitable northern aplomado falcon habitat just within BND property.

***Land Use and Recreation, and Visual Resources, Land Use and Recreation, 4-290, paragraph 6*:** *"Ongoing and recently completed projects, such as the San Roman Wind Farm (4,000 acres) and the Cameron Wind Farm (15,000 acres), have contributed to the conversion of the land in Cameron County to industrial use; however, given that the actual acreage of conversion within these facilities is minimal (i.e., the majority of land is still able to be used for agricultural purposes), contributions to cumulative impacts on land use from these projects would be permanent, but negligible, when considered with the total available land in Cameron County."* FA04-45

Impacts to northern aplomado falcon habitat are not negligible when there is limited habitat left in Cameron County, Texas, and existing and proposed wind energy projects around Laguna Atascosa NWR have impacted the use of the habitat and northern aplomado falcon territories.

***5.2 FERC Staff Recommended Mitigation, Sb, 5-16*:** *"implementation of endangered, threatened, or special concern species mitigation measures."* FA04-46

FWS recommends offsetting impacts to endangered species habitat that will be in place and protected in perpetuity.

National Park Service

Three designated National Historic Landmarks (NHLs) are located in the project vicinity: Palo Alto Battlefield, Resaca de la Palma Battlefield, and Palmito Ranch Battlefield. Palo Alto Battlefield and Resaca de la Palma Battlefield are managed by the National Park Service as a National Historical Park (NHP) unit. Because of this NHL designation, the Heritage

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FA04-43 Comment noted. The requested change has been made.

FA04-44 The referenced text has been modified to clarify that the statement does not refer to the three proposed LNG projects.

FA04-45 Thank you for your comment. Cumulative impacts on the aplomado falcon, including from habitat loss, are addressed in section 4.13.3.5.

FA04-46 See response to comment FA04-3.

Partnerships Program, which manages the NHL program for the Intermountain Regional Office, has provided additional comments regarding the Palmito Ranch Battlefield NHL.

Authorized by the Historic Sites Act and administered by the National Park Service, the NHL program recognizes buildings, sites, districts, structures, and objects determined by the Secretary of the Interior to be nationally significant in American history and culture. Section 110(f) of the National Historic Preservation Act (NHPA) requires federal agencies to consult with the Secretary of the Interior (delegated to the National Park Service) to identify ways to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.

General Comments - NPS

FA04-47

NPS is concerned about the potential adverse effects on the viewsheds, soundscapes, and night skies of the Palo Alto Battlefield National Historical Park and those of the Palmito Ranch Battlefield National Historic Landmark that could result from the construction and operation of the proposed Annova LNG and the two additional proposed LNG projects that are currently undergoing the FERC application/permitting processes. Attachment 1 is a map showing the location of the three proposed LNG terminal sites in relationship to Palo Alto Battlefield NHP and the Palmito Ranch Battlefield NHL.

As evident in the 2016 aerial imagery (Attachment 1), the area to the east of Palo Alto Battlefield NHP and to the north of Palmito Ranch Battlefield NHL is largely undeveloped and remains relatively unchanged from the time that these two battles occurred during the mid-nineteenth century. NPS acknowledges the environmental impact the BSC had on the hydrology and the immediate terrain when it was constructed in the 1930s, but at the time it did little to change the character of the surrounding landscape.

This landscape is a very flat, broad coastal plain comprised of open tidal flats, shallow estuaries, wetland prairies, punctuated with numerous low-lying clay dunes locally known as "lomas." The elevation of this area fluctuates between just above mean sea level (MSL) to about 20-25 feet above MSL. The proposed Annova LNG terminal is situated on the south side of the BCS in close proximity to Palmito Ranch Battlefield NHL. The proposed Annova terminal site would include two LNG storage tanks that would be 260 feet wide and 186 feet high, a 160-foot high main flare stack, and a 45-foot high marine flare stack.

The proposed structures would result in rather imposing intrusions upon the flat landscape of the Rio Grande Delta and transform the current character of the landscape into an industrial landscape. These visual effects, along with an increased artificial lighting and audible disturbance from construction and operation of the terminal, to the setting and character of the battlefields would be substantially increased if all three proposed LNG terminal projects are permitted to be constructed and brought into operation.

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FA04-47 Comment noted. Much of the analysis is section 4.8.5 (Visual Resources) and section 4.11.2 (Noise) in the EIS focuses on potential impacts on the Palo Alto Battlefield NHL and the Palmito Ranch NHL including analysis added at the request of the NPS during the Project pre-filing phase. Similar, but cumulative impacts from construction and operation of the three proposed LNG projects, are addressed in section 4.13 of the EIS. See responses to specific comments below.

Specific Comments - NPS

***2.1, Proposed Facilities*:** NPS requests that the number and height of structures that will require aircraft warning devices and the type of aircraft warning devices Annova LNG anticipates using on elevated structures be identified in the final EIS so potential impacts to visual resources and night skies can be analyzed and mitigation measures developed to minimize visual impacts. For example, it believes the use of white strobes over painted markings for daytime visibility would be preferable to red strobes. FA04-48

***2.8.5, Fire Protection System*:** The fire protection system calls for a 250,000 gallon potable water storage tank. NPS requests that the final EIS provide additional details about this structure and the potential impacts it could have on visual resources and night skies, if it will require visual and lighted aircraft warnings devices. FA04-49

***4.8.5, Land Use, Recreation, and Visual Resources*:** NPS requests that the final EIS describe the potential impacts of the proposed action on the visual resources of the Palmito Ranch Battlefield NHL, incorporating aspects of historic integrity such as setting and feeling. The area of the Palmito Ranch Battlefield NHL retains a high degree of historic character and integrity of setting. The lands within the boundary of the Palmito Ranch Battlefield NHL, like much of the surrounding area, have seen little change in nearly 160 years. According to the documentation for its 1997 NHL designation, "Palmito Ranch Battlefield - retains exceptional integrity of setting, feeling, association and location, nearly 130 years after the battle, which occurred on May 12 and 13, 1865." The Advisory Council on Historic Preservation (ACHP) regulation 36 CFR§800.5 requires the consideration of adverse effects when an undertaking may alter directly or indirectly any of the characteristics of a historic property or that may diminish the integrity of the property's location, setting, feeling or association. This includes the introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. FA04-50

***4.8.5.2, Visual Impact Analysis*:** NPS appreciates the effort to provide high quality visual simulations of the proposed project from identified viewpoints. The visual simulations of the Project site provide an idea of the effects on the Palmito Ranch Battlefield NHL but do not adequately convey the impacts to the character and integrity of the NHL. As a result, it believes that the DEIS understates the potential visual impacts of the project. FA04-51

Since the Project site is less than three miles from the northern boundary of the NHL and would be highly visible to visitors on Highway 4, NPS would welcome the opportunity to discuss additional measures that could be taken to minimize potential visual impacts, such as appropriate paint colors for tall structures. FA04-52

With regard to the visual impacts to the Palo Alto Battlefield NHP, while the Project site is located some 12 miles from the overlook site on the battlefield, the features of the project will be visible. Based upon practical experience, the visual impacts of structures at the Port of Brownsville, nearby windfarms and other tall structures equal to those at the project site are more pronounced in actuality than as rendered in visual simulations. For this reason, NPS believes that there will be an adverse effect on the NHL. FA04-53

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FA04-48 FAA aircraft warning devices are only required on structures over 200 feet in height. See sections 4.6.1.2 and 4.12.5.7 of the EIS. In response to this comment we also requested that Annova verify that no FAA warning devices would be required. In its response filed on March 25, 2019 (FERC accession number 20190325-5179) Annova confirmed that no FAA warning lights or devices would be required or are proposed for the Project.

FA04-49 On March 15, 2019, we requested that Annova provide additional information on the potable water storage tank and the similarly sized condensate storage tank. In its response filed on March 25, 2019 (FERC accession number 20190325-5179) Annova stated the potable water storage tank would be 40 feet in diameter and 30 feet in height and painted a dull green color ("covert green") to reduce visual impacts. The final EIS has been updated to include this additional information.

FA04-50 Section 4.5.8.2 of the EIS describes the potential impacts of the proposed Annova Project on the visual resources of the Palmito Ranch Battlefield NHL. See the description and analysis for KOP1, KOP2, and KOP3.

FA04-51 We used the visual simulations as a tool to assist with the analysis of potential visual impacts, however other factors were considered in our analysis such as landscape, existing vegetation, and distance. Section 4.10.1.2 of the final EIS has been revised to indicate that the NPS does not concur with conclusions on impacts to the character and integrity of the Palmito Ranch Battlefield NHL, and that consultations between FERC staff and the NPS will continue.

FA04-52 On March 15, 2019, we requested that Annova provide additional information on the proposed paint colors for the tall structures. In its response filed on March 25, 2019 (FERC accession number 20190325-5179) Annova stated the proposed tall structures would be painted a dull green color ("covert green") to reduce visual impacts. See also response to comment FA04-51.

FA04-53 Section 4.10.1.2 of the final EIS has been revised to indicate that the NPS does not concur with conclusions on impacts to the character and integrity of the Palo Alto Battlefield NHL, and that consultations between FERC staff and the NPS will continue.

Also, given the number of LNG vessels anticipated per year for the three proposed LNG terminals, we suggest that their visibility from the battlefields be considered in the impact analysis for the Annova LNG project. FA04-54

NPS also appreciates the proposed best practice lighting design measures (p. 4-105). While there is currently little nighttime use of the Palo Alto Battlefield NHP, there is a potential for future nighttime programs or use. The impacts of nighttime lighting and occasional flaring from the project will visually affect the battlefields. Cumulative impacts of nighttime lighting from other LNG projects, the Port of Brownsville, SpaceX and other potential projects will have a major effect on the night sky and the historic setting and feeling of the site. NPS welcomes further discussions on appropriate dark skies lighting technology uses at the project site. FA04-55

***4.9.10.1, Land Transportation*:** NPS requests the final EIS describe and analyze the potential effects of traffic noise on and intrusion into the setting and feeling of both Palo Alto Battlefield NHP, and Palmito Ranch Battlefield NHL pursuant to 36 CFR§800.5. FA04-56

NPS also requests that the DEIS include additional analysis of the cumulative impact of increased traffic on Palo Alto Battlefield NHP and Palmito Ranch NHL. This should include projections for construction vehicles transporting materials, equipment or supplies or providing service and support to the construction of the project in addition to vehicles required to transport the workforce. It should also include projections for support and delivery vehicles to the site during operation of the facility. The potential impacts to visitation at both Palo Alto Battlefield NHP, and Palmito Ranch Battlefield NHL due to increased traffic during the construction and operation of the facility should be addressed in the final EIS. FA04-57

Table 4.9.10.3 indicates that SH 550 become the preferred route for truck traffic to the project site and Figure 4.9.10-2 identifies SH 511 as an alternative truck route serving two of the three concrete plants needed for the project. While it would be preferable for trucks to use SH 550, because of the tolls involved, the likelihood that the majority of trucks will ultimately use SH 511 to avoid the toll should be considered. This truck traffic will pass immediately adjacent to the Palo Alto Battlefield NHP. FA04-58

NPS requests that additional details be included about the possible construction of an eastbound left-turn lane and a westbound right-turn acceleration lane on SH 4, which is identified as potential mitigation measures for construction-related traffic. It seems likely the addition of these turn lanes would require widening SH 4 along the Palmito Ranch Battlefield NHL boundary. This, and future road maintenance, may deter visitors from viewing roadside interpretive exhibits along SH 4. FA04-59

***4.10.1, Cultural Resource Survey*:** This section characterizes Palmito Ranch Battlefield NHL as: *"the only non-archeological historic-age resource with the 300-foot-radius indirect APE for the Project access road. Based on field investigations, we determined that the Project would have no direct or indirect effect on this historic property."* As noted in previous comments, NPS disagrees with this determination, as they anticipate that the proposed project will have adverse effects on the viewsheds, soundscapes, and night skies of the Palmito Ranch Battlefield NHL and FA04-60

15

FA04 continued, page 15 of 19

FA04-54 Appendix E includes one visual simulation that includes an LNG vessel at the Project site. See figure E-8b.

FA04-55 As noted in responses to comments FA04-51 and 53, consultations between FERC staff and NPS will continue. Further discussions of appropriate dark skies lighting technology can be a part of those consultations.

FA04-56 Potential construction noise impacts on the Palmito Ranch Battlefield NHL are assessed in section 4.11 of the EIS and discussed with respect to recreation in section 4.8.4.2. Given its distance from the Project site, the Palo Alto Battlefield NHP was not considered a noise sensitive area.

FA04-57 Potential impacts of Project-related traffic on Palo Alto Battlefield NHP and Palmito Ranch Battlefield NHL are discussed in sections 4.8.4.2 and 4.9.10.1 of the EIS. Annova estimated there would be an average of 30 delivery vehicles per day during construction, with peak deliveries of up to 80 delivery vehicles per day during large concrete pour. This increase in truck traffic on area roadways could be noticeable during construction but would be short term and not expected deter visits to the Palo Alto Battlefield NHP or Palmito Ranch Battlefield NHL. This information has been added to sections 4.8.4.2 and 4.9.10.1. Additional analysis of potential cumulative construction-related traffic impacts has also been added to section 4.13.3.7.

FA04-58 Annova's transportation consultant identified the Alternate North Truck Route as the recommended truck route to and from the north (see EIS figure 4.9.10-2). This route includes SH 550 and passes alongside the Palo Alto Battlefield NHP. Traffic count data for SH 550 near the SH 550/SH 1847 intersection identified average annual daily traffic volumes of 17,061 in 2017 (Texas Department of Transportation 2019). The addition of 30 to 80 delivery trucks during construction represents a small share of existing volumes at this location, up to 0.5 percent (80/17,061) and, as a result, is not expected to deter visits to the Palo Alto Battlefield NHP. Reference: Texas DOT. 2019. Transportation Planning Maps. District Traffic and Urban Saturation Web Maps. 2017. Website: https://www.txdot.gov/inside-txdot/division/transportation-planning/ maps.html.

FA04-59 We have added the NPS concern to section 4.9.10.1 of the final EIS. However, we have no additional details on the referenced potential road improvement projects beyond what is currently described in the EIS.

FA04-60 See response to comment FA04-51.

the Palo Alto Battlefield NHP through the construction and operation of the proposed Annova LNG. NPS requests that these potential impacts be thoroughly described and analyzed. FA04-61

***4.11.2, Noise*:** The NPS is primarily concerned with the introduction of audible elements associated with the proposed Annova LNG project that could diminish the integrity of either battlefield's sense of place, feeling and setting, in accordance with the regulation 36 CFR 800.5, and request that this be thoroughly analyzed. It appreciates the comprehensive noise analysis that included predictions of noise for Noise Sensitive Area 4 (NSA4), a noise sensitive area in the interior of the Palmito Ranch Battlefield NHL. It further appreciates the disclosure that changes in the sound level caused by project construction were estimated to be "very noticeable" at NSA4, as well as the disclosure that flaring would produce a low-pitched "roaring" sound that nearby residents or visitors to the Palmito Ranch Battlefield NHL would distinctly notice. FA04-62

NPS recommends that, to the extent possible, marine and maintenance flaring noise be included with the p. 4-189 recommended noise surveys for each new liquefaction train under full power load and the entire LNG operation under full power load (maximum possible horsepower), so that the effect of flaring noise are not neglected in the noise surveys. NPS similarly suggests that the noise surveys be conducted following the construction of the Annova LNG project including, if needed, a site evaluation to assess the cumulative effect of the LNG operation (with flaring) on the historic integrity of the Palmito Ranch Battlefield NHL. FA04-63

If the p. 4-189 recommended noise surveys or the Texas Historical Commission (THC) observations determine that additional noise controls are needed, NPS would respectfully suggest that one potential, reasonable mitigation measure would be removal of elevated flaring stacks and replacement by a ground-based flaring system, with a noise barrier wall to reduce the level of noise and visual impacts to the surrounding landscape. FA04-64

***Section 4.13 Cumulative Impacts*:** The combination of the SpaceX facility, 3 LNG projects, a 15 mile 138 kV transmission line and the existing and planned Port of Brownsville structures could affect the historic character and integrity of the Palo Alto Battlefield NHP to a significant degree. The Palmito Ranch Battlefield NHL could also be affected as well. It is reasonable to believe there are other foreseeable effects caused by this undertaking that could occur later in time. The cumulative impacts to the viewsheds from tall structures and lighting could be significant. As a result, NPS believes that the DEIS understates the cumulative impacts and request additional analysis be conducted. FA04-65

NPS requests that the cumulative impact analysis be expanded to include the additional truck traffic serving the other two LNG sites and the Port of Brownsville, in addition to truck traffic associated with the connection to the East Loop highway to the Veteran's International Bridge crossing to Mexico. It believes that the potential impacts of increased traffic will adversely affect both sites in terms of noise, air quality and visual intrusion as a backdrop to the battlefield site. Traffic from workers and trucks during both construction and operation of the project combined with traffic associated with the SpaceX facility and the Stargate facility will affect the Palmito Ranch Battlefield NHL with increased noise and visual intrusions. It is reasonably foreseeable that SH 4 will require frequent maintenance and possible widening to four lanes. As previously noted, NPS believes there will be adverse cumulative impacts to Palo Alto Battlefield NHP, and FA04-66

FA04 continued, page 16 of 19

FA04-61 See response to comment FA04-53.

FA04-62 Thank you for your comment.

FA04-63 This requested change has been made to the recommendation in section 4.11.2.4 of the final EIS.

FA04-64 Thank you for your comment. The requested measure may be considered by Annova depending on the results of the required operational noise survey.

FA04-65 Section 4.13.3.6 of the final EIS has been revised to clarify the potential cumulative visual impacts on the NHLs.

FA04-66 Section 4.13.3.7 of the final EIS has been revised to include additional discussion of potential cumulative impacts from construction traffic.

Palmito Ranch Battlefield NHL due to increased traffic, so request that these impacts be thoroughly analyzed. FA04-66 Cont'd

Noting that the final routing of the proposed electric transmission line (and associated temporary power line) is not identified, it is unclear what, if any, potential visual effect these could have on either the Palo Alto Battlefield NHP, or the Palmito Ranch Battlefield NHL. NPS requests that the final EIS describe the type of structure that will be used for the proposed permanent and temporary transmission lines, as well as the height of these structures, and evaluate potential impacts on the two sites. FA04-67

In conclusion, NPS appreciates the opportunity to review the Annova LNG DEIS as a cooperating agency and looks forward to working with FERC as a consulting party for its compliance with Section 106 of the NHPA. Please note, that while the NPS manages the Palo Alto Battlefield National Historical Park (Palo Alto Battlefield NHL and Resaca de la Palma Battlefield NHL), the NPS also has a responsibility to work with other agencies to identify ways to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking, including the Palmito Ranch Battlefield NHL, which is managed by FWS' Lower Rio Grande Valley National Wildlife Refuge, pursuant to Section 110(f) of NHPA. FA04-68

NPS considers that visual resources should include aspects of historic integrity such as setting and feeling that allow visitors to historic sites to experience a resource such as a battlefield in a contemplative manner, so that they can imagine a scene unimpaired as it might have existed during its period of significance. Modern intrusions into the landscape may impact the historic viewshed, irrespective of whether the proposed project is on private, rather than federal or state land. Essentially, the three proposed LNG terminals will transform a sparsely developed landscape into an industrial landscape adversely affecting the historic setting and feeling of the battlefields and this needs to be analyzed so decision makers are fully informed. FA04-69

The DEIS notes that Section 106 compliance with the National Historic Preservation Act (NHPA) has not yet been completed (see p. 4-156). NPS requests to participate as a consulting party to the review and compliance process pursuant to Section 106, 36 CFR 800.2. As described above, cumulative impacts to visitor experience and aspects of historic integrity, including setting and feeling, within the boundaries of designated NHLs are of concern. FA04-70

CONCLUDING REMARKS

We appreciate the opportunity to provide input on the Annova draft EIS. Should you have questions in response to these comments, please contact, for FWS, Dawn Gardiner, U. S. Fish and Wildlife Service, at dawn_gardiner@fws.gov (361.225.7310); and for NPS, Rolando Garza, the Park's Chief of Resource Management, rolando_garza@nps.gov ; (956) 541-2785 ext. 331; as well as Justin Henderson, Intermountain Regional Office, Historic Partnerships Program Manager, at justin_henderson@nps.gov at (303) 969-2540, for any NHL-related questions.

FA04 continued, page 17 of 19

FA04-67 The temporary and permanent electric transmission lines that would serve the Annova LNG Project are non-jurisdictional facilities, and FERC is not aware of the details for these facilities such as type of structures or their height.

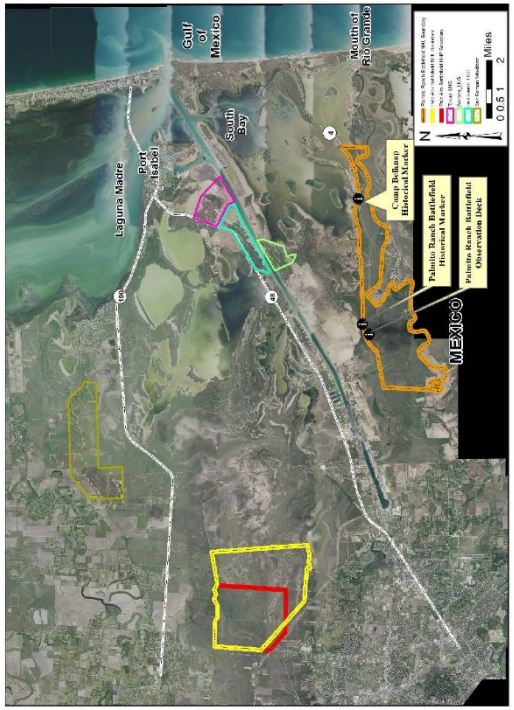
FA04-68 Thank you for your comment. The Commission staff also looks forward to ongoing consultation with the NPS.

FA04-69 Thank you for your comment. See response to comments FA04-51 and FA04-53.

FA04-70 We have revised the recommendation in section 4.10.5 of the final EIS to include the NPS as a consulting party.

Sincerely,

Susan King
Acting Regional Environmental Officer


Laguna Madre
Port Isabel
Gulf of Mexico
South Bay
Mouth of Rio Grande
Camp Belknap Historical Marker
Palmito Ranch Battlefield Historical Marker
Palmito Ranch Battlefield Observation Deck
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ORIGINAL

January 9, 2019

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

Via: Mail

Re: TCEQ NEPA Request #2018-368, Notice of Availability of the Draft Environmental Impact Statement for the Proposed Annova LNG Brownsville Project, Docket No. CP16-480-000; Brownsville, Texas, Cameron County

Dear Ms. Bose:

The Texas Commission on Environmental Quality (TCEQ) has reviewed the above-referenced project and offers the following comments: SA01-1

In accordance with the General Conformity regulations in 40 CFR Part 93, this proposed action was reviewed for air quality impact. The proposed action is located in Cameron County, which is currently designated as attainment/unclassified for the National Ambient Air Quality Standards for all six criteria air pollutants. General conformity requirements do not apply.

The Office of Water has no comment on this project. SA01-2

Any debris or waste disposal should be at an appropriately authorized disposal facility. If the facility intends to store hazardous waste for more than 90 days, they need to coordinate with our Waste Permits Division to seek authorization prior to storage. SA01-3

Thank you for the opportunity to review this project. If you have any questions, please contact the agency NEPA Coordinator, at (512) 239-3500 or NEPA@tceq.texas.gov.

Sincerely,

Ryan Vise
Division Director
Intergovernmental Relations

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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STATE AGENCIES

SA01 Texas Commission on Environmental Quality, page 1 of 1

SA01-1 Thank you for your comment.

SA01-2 Thank you for your comment.

SA01-3 Thank you for your comment.

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February 4, 2019

VIA ELECTRONIC FILING

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

Re: OEP/DG2E/Gas Branch 3
Annova LNG Common Infrastructure, LLC
Annova LNG Brownsville A, LLC
Annova LNG Brownsville B, LLC
Annova LNG Brownsville C, LLC
Annova LNG Brownsville Project
Docket No. CP16-480-000

Dear Secretary Bose:

Texas Parks and Wildlife Department (TPWD) has reviewed the Draft Environmental Impact Statement (DEIS) issued by the Federal Energy Regulatory Commission (FERC or Commission) in December 2018 for the Annova LNG Brownsville Project (Project). Annova LNG Common Infrastructure, LLC; Annova LNG Brownsville A, LLC; Annova LNG Brownsville B, LLC; and Annova LNG Brownsville C, LLC (collectively Annova), request authorization to site, construct and operate a liquefied natural gas (LNG) export facility consisting of a marine export facility and a natural gas liquefaction facility including six liquefaction trains on a 731-acre site on the south bank of the Brownsville Ship Channel (BSC) near Brownsville in Cameron County, Texas.

The DEIS concludes that construction and operation of the Annova LNG Project would result in some unavoidable adverse environmental impacts that would be reduced to less than significant levels with the implementation of Annova's proposed impact avoidance, minimization, and mitigation measures and the additional measures recommended by FERC staff. In addition, the Annova LNG Project, combined with other projects in the geographic scope, including the Rio Grande LNG and Texas LNG Projects, would result in significant cumulative impacts from sedimentation/turbidity and shoreline erosion within the BSC during operations from vessel transits and on the state and federally listed ocelot and jaguarundi from habitat loss and potential for increased vehicular strikes during construction and on visual resources from the presence of aboveground structures.

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TPWD has provided substantive comments and recommendations to U.S. Army Corps of Engineers (USACE) in response to a Public Notice (PN) issued on December 27, 2018 for permit application number SWG-2015-00110 associated with the Annova LNG Project (see attachment). Following the organization of the DEIS, TPWD offers additional comments and recommendations concerning potential impacts to state fish and wildlife resources.

Section 1.4
According to this section of the DEIS, as well Sections 2.1, 4.13, and others, the construction of a natural gas supply lateral pipeline, electrical transmission line and switchyard, and potable water pipeline are defined as "non-jurisdictional facilities that may be integral to the need for the proposed [LNG] facilities." Because the source of natural gas, electricity, and water at the proposed LNG facility is dependent upon new gas, power, and water infrastructure that would directly impact over 200 acres, per Council on Environmental Quality (CEQ) §1508.25 (a)(1), the construction of the gas line, transmission line, and water line are connected actions and their potential environmental impacts should be discussed in the same impact statement as the LNG facility. SA02-1

Section 1.4.1 describes the natural gas supply lateral pipeline as an "as yet undetermined third party-owned and -operated intrastate pipeline that would connect to the Valley Crossing Pipeline System". This description is inconsistent with information provided in the above-referenced PN issued by USACE. The PN includes the natural gas supply lateral pipeline as a connected action and states, "The applicant proposes to construct and operate a 9.0-mile-long, 36-inch-diameter pipeline that would provide natural gas to the proposed natural gas liquefaction, storage, and export facility (Terminal)." SA02-2

The scope of the DEIS is to describe the environmental consequences of the project. According to the DEIS, these facilities are classified as "non-jurisdictional" because they are not under the permitting authority of the Commission. Nonetheless, their combined surface impacts are greater than 50 percent of the impacts of the LNG facilities.

> **Recommendation:** Potential impacts related to the construction of a new 9-mile-long gas supply line, 15-mile-long electrical transmission line, and 5.9-mile-long water line should be evaluated and included in the final environmental impact statement (FEIS). Issues to be evaluated should include, but not be limited to, an alternative route analysis, terrestrial and aquatic habitat impacts, right-of-way (ROW) requirements, fish and wildlife impacts, and use of Avian Power Line Interaction Committee (APLIC) Best Management Practices (BMPs) (e.g., bird flight diverters, line markers) to minimize potential bird-transmission line collisions.

SA02 continued, page 2 of 24

SA02-1 Comment noted. Non-jurisdictional facilities are discussed as part of cumulative impacts in section 4.13 of the EIS.

SA02-2 Non-jurisdictional facilities are discussed as part of cumulative impacts in section 4.13 of the EIS.

Section 2.5

The DEIS states that Annova developed a Project-specific *Upland Erosion Control, Revegetation, and Maintenance Plan* (Annova *Plan*) and *Wetland and Waterbody Construction and Mitigation Procedures* (Annova *Procedures*). SA02-3

Comment: TPWD's comments and recommendations concerning the Annova *Plan* and *Procedures* are detailed in the attached letter to USACE.

This section also discusses environmental training for employees to ensure employees receive training before beginning work on site.

Recommendation: TPWD recommends producing bilingual take-away fact sheets with photographs of state and federally-listed species most likely to be encountered on the site to ensure all employees are adequately informed regarding the proper identification, protected status, appropriate avoidance measures, and Environmental Inspector (EI) contact information.

Section 2.6.2.1

This section of the DEIS refers to Annova's *Dredged Material Transport Plan* and application to USACE for details about the potential use of dredged material. The plan does not identify specific beneficial use sites but identifies the types of projects for which the materials may be suitable and states that Annova will continue to explore beneficial use opportunities with federal, state, and local resource agencies. SA02-4

Recommendation: TPWD encourages the beneficial use of dredged material for habitat restoration and shoreline stabilization activities. Such activities may be needed within the BSC to protect sensitive habitats, such as rookery islands as well as vegetated and unvegetated shorelines, from erosion associated with increased ship traffic from this and other projects.

Section 2.9

The DEIS describes Annova's future plans for expansion or abandonment of the Project facilities. Annova anticipates the Project will have a 25-year life span but would be designed to be capable of operating 50 years or more with proper maintenance. Annova has no foreseeable plans for expansion or abandonment of the Project facilities, but; if future expansion plans are developed, Annova would seek appropriate authorizations from federal, state, and local agencies. The DEIS does not describe the fate of the Project at the end of life. SA02-5

Recommendation: The FEIS should describe the fate of the Project at the end of life. TPWD prefers site restoration over abandonment assuming that the previously disturbed site cannot be repurposed to accommodate a new project. Dismantled components of the Project should be disposed of properly.

SA02-3 In response to this and other comments in this letter that recommend measures that Annova should incorporate into its Project design or plans, on March 15, 2019 we requested that Annova provide a response to TPWD recommendations in this letter. On March 25, 2019, Annova filed its response, stating that it has consulted with TPWD to discuss the TPWD comments on the draft EIS and included a table summarizing how it would address the TPWD recommendations. The filing is included on the FERC docket under accession number 20190325-5179.

SA02-4 Thank you for your comment.

SA02-5 If Annova decides to abandon facilities in the future, Annova would seek the appropriate authorizations from federal, state, and local agencies at that time. Plans and requirements for abandonment would be developed at that time.

Section 3.3.2
This section of the DEIS evaluates proposed and planned LNG export projects as system alternatives to the Annova LNG Project. This section does not consider Galveston Bay LNG which has begun the FERC pre-filing process (FERC Docket No. PF18-7-000). SA02-6

Recommendation: The FEIS should evaluate the Galveston Bay LNG project as a potential system alternative.

Section 4.2.3 (and Sections 2.6.1, 4.5.2, 4.6.1, 4.7.2, 4.8.1)
This section, and others, discusses vegetation impacts and mitigation including proposed revegetation plans. Throughout the DEIS, revegetation is described as both a managed act (i.e., seeding with native vegetation) and an unmanaged act (i.e., areas would be allowed to revegetate naturally, e.g., Section 2.6.1.1, 4.5.2). SA02-7

Recommendation: For clarification, TPWD recommends the FEIS clearly state that disturbed areas would be revegetated following Annova's *Plan* and that no areas disturbed by the project would be left to revegetate naturally, as this often results in recruitment of undesirable, introduced species.

Section 4.3.2
This section of the DEIS describes waterbodies within the vicinity of the project. Although identified in Figure 4.3.2-1, San Martin Lake is not described as a waterbody within the vicinity of the project. San Martin Lake is a large shallow surface water feature connected to the BSC and is located less than 1.5 miles west of the project site. San Martin Lake is referenced in Section 4.7.1.3 as a location of red-crowned parrot sightings and in Section 4.8.4.2 as a recreational fishing site. The compensatory mitigation project proposed at Little San Martin Lake to offset dredge and fill impacts, as described in Section 4.4.2, is based on the restoration of a hydrological connection between San Martin Lake and Little San Martin Lake. SA02-8

Recommendation: The FEIS should include San Martin Lake as a waterbody within the vicinity of the project. Potential impacts to San Martin Lake from construction and operation of the proposed Project and cumulative impacts from this and foreseeable future projects should be evaluated. Measures that will be implemented to avoid and minimize impacts should be described.

For the purpose of evaluating the potential effects of elevated suspended solids concentrations during the construction and operation of the Project, Figure 4.3.2-3 identifies known seagrass beds within the vicinity of the proposed Project. TPWD's seagrass viewer dataset, which was used to create this figure, does not represent presence/absence data but merely identifies areas where seagrasses have been previously documented. It is unclear if the data collection effort includes the SA02-9

SA02-6 Comment noted. The Final EIS has been revised to include the Galveston Bay LNG Project in section 3.3.2.

SA02-7 Annova would follow restoration measures from both its Upland Erosion Control, Revegetation, and Maintenance Plan (Annova's Plan) and its Wetland and Waterbody Construction and Restoration Procedures (Annova's Procedures). Annova's Procedures (section D) allow for restoration of temporally disturbed wetlands through natural revegetation. However, if natural rather than active revegetation is used, Annova's Procedures require that the plant species composition is consistent with early successional wetland plant communities in the affected ecoregion, and invasive species and noxious weeds must be absent to be considered successfully revegetated, unless they are abundant in adjacent areas that were not disturbed by construction.

SA02-8 The final EIS has been revised by the addition of San Martin Lake as requested.

SA02-9 Aquatic resources other than seagrass are addressed in section 4.6.2 of the EIS.

entire area within six miles of the Terminal. In addition, this figure does not identify the locations and extents of other aquatic resources that may be sensitive to sedimentation, such as oysters. SA02-9 Cont'd

Recommendation: Figure 4.3.2-3 should be revised to identify the location and extent of all aquatic habitats that could be adversely affected by increased suspended solids, including submerged aquatic vegetation and oysters. Special attention should be given to shallow waterbodies connected to the BSC, such as San Martin Lake and Bahia Grande.

Sections 4.4 and 4.5
These sections of the DEIS describe potential impacts to wetland and vegetated habitats, as well as potential impacts to South Texas Wind Tidal Flats. As described in the DEIS, tidal flats are characteristically unvegetated. Thus, a tidal flat does not conform to USACE's definition of a wetland but may be considered as a special aquatic site within waters of the U.S. that are under the jurisdiction of USACE. The DEIS and PN state that the project would permanently affect approximately 2.0 acres of non-vegetated tidal flat and open water. Section 4.4.2. suggests that permanent impacts will be mitigated by a compensatory mitigation project at Little San Martin Lake and that temporary impacts would be restored according to Annova's *Plan* and *Procedures*. SA02-10

As detailed in our attached response to USACE's PN, tidal flats are difficult to replace and TPWD is not aware of any successful tidal flat restoration, enhancement, or creation projects in Texas.

Recommendation: The FEIS and Annova's *Procedures* should address TPWD's concerns for permanent impacts to tidal flats and identify measures that will avoid and minimize permanent impacts to tidal flats.

Section 4.4.2
This section identifies approximately 4.9 acres of impacts to wetlands as temporary. Temporary impacts would include loss of wetland vegetation and disturbance of soils, hydrology, and wetland functions during construction, which could be up to about four years. TPWD does not consider the proposed duration of impacts (i.e., up to four years) to be temporary. SA02-11

Recommendation: Compensatory mitigation should be provided for all permanent impacts to aquatic habitats.

TPWD has concern for temporary impacts proposed to tidal flats. As detailed in our response to USACE's PN (attached), tidal flats are difficult to replace and TPWD is not aware of any successful tidal flat restoration projects in Texas. SA02-12

SA02-10 Impacts on tidal flats are acknowledged in the EIS, however mitigation for these impacts would be under the jurisdiction of the COE if considered appropriate during the COE's review of Annova's application to the COE.

SA02-11 Any compensatory migitation required for wetland impacts, temporary or permanent, would be decided during the COE's review of Annova's application to the COE.

SA02-12 See response to comment SA2-10.

Recommendation: Annova should avoid disturbances in tidal flats to the maximum extent practicable. Because tidal flats are difficult to replace, they are usually compensated through an out-of-kind strategy which should exceed 2:1. SA02-12 Cont'd

Section 4.5.3

In order to prevent the spread of invasive plants and noxious weeds due to Project-related activities, equipment would be cleaned before arriving on site, and inspected and re-washed if necessary before being transported to the site. TPWD appreciates these actions. While no species on the federal or state noxious weed list were observed within the project site, eight exotic plant species known to be extremely invasive throughout South Texas were observed. SA02-13

Recommendation: In order to prevent the spread of the eight exotic species throughout areas of the project site that, as of yet, are free of these species, TPWD recommends cleaning equipment after it has worked in areas known to contain the exotic species known to occur on site.

Section 4.6.1.1

This section of the DEIS describes Annova's proposed measures to minimize impacts of outdoor lighting at the LNG Terminal. A Facility Lighting Plan has not yet been produced. As proposed, lighting would be installed only where needed, would be directed downward, use warm colors (minimum use of blue light) and shielded to avoid shining into adjacent habitat. Where light use is intermittent, the use of timers and motion detection sensors would be implemented. SA02-14

Recommendation: TPWD appreciates the proposed measures to reduce potential impacts of artificial night lighting at the Annova LNG facilities. To further minimize potential impacts associated with night lighting, TPWD recommends that down-shielded light fixtures should be mounted as low as possible to further reduce the amount of glare and light visible to animals in the area. Also, recent research has indicated that the use of LED lighting in outdoor applications may increase potential negative impacts to wildlife. In general, using bulbs with long wavelengths (e.g., amber) that is the lowest possible lighting level consistent with human safety further reduces potential negative impacts to wildlife. Light emitted at 589 nanometers (nm) has been determined to provide effective vision for humans while minimizing the amount of interference with some nocturnal animals. If LED lights must be used, TPWD recommends dimming them if possible and having them turn off for a portion of the night (e.g., midnight until 5 AM). Also, if full-spectrum LED lighting is required, the lowest possible color temperature is recommended (i.e., use colors in consideration of wildlife) (Longcore and Rich 2016).

Section 4.6.1.2

SA02-13 We do not agree that it should be required to clean equipment as it moves from area to area within the Project site. However, Annova's Plan includes standards for establishing successful revegetation of areas of the Project site that would be disturbed during construction and revegetated following construction. Those standards include consideration for minimizing presence of invasive species in order to determine that areas are successfully revegetated.

SA02-14 In response to this and other comments in this letter that recommend measures that Annova should incorporate into its Project design or plans, on March 15, 2019 we requested that Annova provide a response to TPWD recommendations in this letter. On March 25, 2019, Annova filed its response, stating that it has consulted with TPWD to discuss the TPWD comments on the draft EIS and included a table summarizing how it would address the TPWD recommendations. The filing is included on the FERC docket under accession number 20190325-5179.

This section describes potential impacts to unique and sensitive wildlife resources present within the vicinity of the Project and the measures that would be implemented to avoid and minimize those impacts. This section also defines colonial waterbirds and states that no colonial waterbird rookeries have been identified at the Project site. Rookery islands located within the vicinity of the Project site, such as the island located at the confluence of the BSC and the Port Isabel Channel, do not appear to be considered in the DEIS. SA02-14

Recommendation: The FEIS should identify the colonial waterbird rookery located at the confluence of the BSC and the Port Isabel Channel and evaluate potential impacts from this and other projects, such as erosion from increased ship traffic. The FEIS should also describe measures that would be implemented to avoid and minimize those impacts, such as beneficial use of dredged material, shoreline stabilization, and/or mitigation. SA02-14a

Section 4.6.2.1
The DEIS identifies seagrass beds as nursery habitat for commercially important fishes and crustaceans but states that the BSC supports little submerged vegetation. The DEIS also states that the BSC is likely used by adult life stages of fish species. SA02-15

Comment: The importance of the BSC and connected shallows should not be underestimated. Other aquatic habitats (such as oysters, marshes, and mangroves) found along the margins of the BSC and within the connected shallow water basins also provide important nursery habitat to juvenile fishes, shrimps, and crabs and forage habitat for adult life stages. The BSC serves as a migration corridor for all stages of life by providing a conduit between the adjacent shallow nurseries and the spawning habitat offshore in the Gulf of Mexico. The BSC also provides bare mud substrate that supports the penaeid shrimp fisheries.

Section 4.7.2.3
The last sentence of the fourth paragraph of this section states that FERC have included a recommendation in Section 4.7.3 that Annova continue to consult with TPWD regarding implementation of reptile BMPs. However, no such recommendation occurs in Section 4.7.3. SA02-16

Recommendation: TPWD recommends the FEIS direct Annova to continue consultation regarding the implementation of TPWD BMPs for reptiles.

The DEIS identified lomas as providing important habitat for protected wildlife species. In previous correspondence, TPWD assessed that Texas tortoises could be present on lomas. Observations of the Texas tortoise, as well as Texas horned lizards and Texas indigo snakes, confirmed TPWD's assessment. Annova has SA02-17

SA02-14a Section 4.6.1.2 of the final EIS has been revised to include discussion of the colonial waterbird rookery located at the confluence of the BSC and the Port Isabel Channel.

SA02-15 Section 4.6.2.1 of the final EIS has been revised to include additional discussion of the importance of the BSC and connected shallow water habitat.

SA02-16 The reference to a recommendation in section 4.7.3 of the draft EIS was an error. With regard to implementation of the TPWD recommendations, see response to comment SA02-14.

SA02-17 In section 4.6.1.2 we recommend that Annova develop a project-specific Migratory Bird Plan that includes measures to avoid and minimize impacts on migratory birds, and that the plan be developed in consultation with the FWS. The Migratory Bird Plan would be the appropriate place to address best practices for communication tower measures to reduce impacts on birds.

agreed to comply with TPWD's recommended BMPs regarding covering trenches or providing escape ramps for wildlife, or fencing off work areas with an exclusion fence. The last paragraph in this section under "Terrestrial and Freshwater Reptiles" states that FERC has concluded impacts on this group of species would be minor. SA02-17 Cont'd

Recommendation: TPWD appreciates that BMPs to protect reptile would be implemented at the project site. To further ensure negative impacts to protected wildlife, such as the Texas tortoise, are minor, TPWD recommends installing an exclusion fence around areas (particularly lomas) that would be disturbed. Prior to clearing, TPWD recommends that pre-construction surveys within exclusion areas be conducted for tortoises following survey protocols that are comprehensive enough in design to locate and remove tortoises that would be permanently impacted by clearing the site.

Due to habitat suitability similarities, tortoises or other captured species could be relocated to the off-site lands Annova is evaluating to conserve to aid in ocelot conservation. When relocated, TPWD recommends implementing a "soft-release" protocol.

Section 4.7.2.2

Sections 2.1.10.3, 4.8.5.2, and 4.13.3.4 reference a communication tower that would be constructed on the project site. The DEIS did not provide details regarding the design of the proposed telecommunication tower (e.g., height, guyed or self-supporting). Regarding measures to minimize potential bird collisions with communication towers, the DEIS cites implementing measures described in the U.S. Fish and Wildlife Service (USFWS) 2016 *Guidelines for Recommendations on Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning.* SA02-17

Comment: TPWD recommends reviewing the April 2018 USFWS guidelines for telecommunication towers, *U.S. Fish and Wildlife Service Communication Tower Guidance* (also referred to as the *Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance, and Decommissioning* and implementing as appropriate. Additionally, TPWD recommends reviewing the Federal Communications Commission (FCC) 2017 publication on *Opportunities to Reduce Bird Collisions with Communications Towers While Reducing Tower Lighting Costs* which outlines the FCC and FAA guidance for ensuring that tower lighting is bird-safe while also reducing construction and maintenance costs to tower owners.

SA02-18 Potential impacts from construction of the non-jurisdictional electric transmission line are addressed in cumulative impacts in section 4.13 of the EIS.

This section of the DEIS does not consider potential avian impacts resulting from the construction of a 15-mile-long transmission line that would be constructed for the purpose of providing electrical power to the LNG. SA02-18

Recommendation: As stated under Section 1.4, TPWD recommends potential impacts resulting from the construction of a 15-mile-long transmission line be evaluated in the FEIS. Issues that should be evaluated include, but are not limited to, collision impacts, habitat impacts due to right-of-way clearing, migratory bird nest impacts, and implementation of Avian Power Line Interaction Committee (APLIC) Best Management Practices (BMPs) (e.g., bird flight diverters, line markers) to minimize potential bird-transmission line collisions.

Section 4.8.4.2
This section of the DEIS describes existing recreational resources within the vicinity of the Project site. The description of the Lower Rio Grande Valley National Wildlife Refuge (NWR) makes references to an area known as the "Boca Chica Tract". SA02-19

Comment: Public lands within the Boca Chica Tract are owned by TPWD and managed as part of the NWR through an agreement with USFWS.

Section 4.13.2
The cumulative impact analysis lists many proposed development projects would occur in or near the general area of the Annova LNG project. SA02-20

Comment: TPWD is aware of two additional wind energy development proposed by Acciona Energy in Cameron County generally between Farm-to-Market Road (FM) 510 and the Willacy-Cameron County line. Additionally, South Texas Electric Cooperative, Inc. is in the permitting process to construct the Palmas to East Rio Hondo transmission line northeast of Rio Hondo in Cameron County. These developments should be included and evaluated in the cumulative impact section of the Final EIS. In particular, the cumulative impacts of additional transmission lines and aerial obstacles (wind turbines) on resident and migratory birds should be evaluated.

To meet Federal Aviation Administration (FAA) requirements for visibility, many, if not all, of the proposed wind turbines will have flashing lights on the tops of the towers during operation of the wind energy development.

Recommendation: The FEIS should reflect that several large-scale projects in the area require nighttime lighting during operations and will be a cumulative impact, along with nighttime lighting of the Annova LNG facility, within the area.

SA02-19 Thank you for your comment.

SA02-20 As described in table 4.13.1-1, the geographic scope used for evaluating potential cumulative impacts on resident and migratory birds is the HUC-10 watershed. The projects listed in this comment are outside of the HUC-10 watershed and therefore outside the area included in our analysis.

Section 4.13.3.2-Water Resources
According to the DEIS, the combined operation of all three proposed Brownsville LNG projects would result in an estimated 48% increase in vessel traffic within the BSC. Cumulative impacts on surface water resources associated with shoreline erosion and turbidity from increased vessel traffic are described as moderate and relatively persistent throughout the life of the projects, particularly along unarmored portions of the BSC. It is unclear if shallow waterbodies connected to the BSC were included in this assessment. SA02-21

> **Recommendation:** The FEIS should evaluate if shallow waterbodies connected to the BSC, such as South Bay Coastal Preserve, Mexiquita Flats, Bahia Grande, and San Martin Lake, would be affected by increased vessel traffic. Measures should be identified that would be implemented to avoid and minimize impacts to aquatic habitats including tidal flats, submerged aquatic vegetation, oysters, and marsh within the vicinity of this and similar proposed projects.

Section 4.13.3.3-Vegetation
The third paragraph under the discussion regarding Vegetation under Section 4.13.3.3 states that after construction of non-jurisdictional facilities, disturbed areas would be restored with vegetative habitat. Unless the construction and operation of non-jurisdictional facilities are evaluated as connected actions, it is unclear how FERC and/or Annova can make commitments on behalf of unknown third party developers. SA02-22

> **Recommendation:** The FEIS should only describe activities for which Annova is responsible and not anticipate the mitigation measures others may or may not implement.

Section 4.13.3.5
This section states that discussion on cumulative impacts on threatened and endangered species would be limited to only those threatened and endangered species identified in Section 4.7 as potentially being affected by the proposed project. However, the only species addressed in this section of the cumulative impact analysis are federally listed species. SA02-23

> **Recommendation:** Section 4.7 of the Draft EIS indicates that a number of state-listed species could and do occur in the project area and could be directly impacted by the project. Because state law prohibits the capture, trap, take or kill (incidental or otherwise) of state-listed species, TPWD recommends Section 4.13.3.5 also address the cumulative impacts of the project on state-listed species that may be affected by the project.

SA02 continued, page 10 of 24

SA02-21 Shallow waterbodies that are connected to the BSC are included in the EIS's assessment of potential cumulative impacts on water resources. Section 4.13.2.2 of the final EIS has been revised to make this clear.

SA02-22 The final EIS has been revised to remove the referenced sentence that described expected commitments that would be made following construction of the non-jurisdictional facilities.

SA02-23 We have intentionally limited the analysis in section 4.13.3.5 to federally listed species.

Section 5.1.6
In this section, and throughout the Draft EIS (e.g., Section 4.6.1.1), the presumption that impacts to wildlife would be mitigated because "diverse and ample undisturbed habitat is available in the vicinity of the Project site" is presented. For a variety of reasons, wildlife currently occupying the Project area may not relocate on their own to adjacent habitat. Behaviorally, a Texas tortoise will withdraw into its shell and remain motionless when it perceives a threat; it will not flee. Also, adjacent habitat may not be suitable for those species that would flee on their own, or it may already be occupied. SA02-24

This section also states that, to minimize impacts on wildlife, "some" of TPWD's recommendations would be implemented but does not identify which ones would be implemented.

Recommendation: To minimize potential impacts to wildlife, particularly sate-listed reptiles, to the greatest extent practical, TPWD recommends relocating individuals as described under Section 4.7.2.3, above.

Section 5.2
FERC recommendation #5 states that if other areas that have not been approved by the Secretary would be used or disturbed to complete the project, then a description of those areas should be provided and describe whether federally listed threatened or endangered species would be affected. SA02-25

Recommendation: If other areas that have not been approved by the Secretary would be used or disturbed to complete the project, TPWD recommends that potential impacts to state-listed species also be assessed for each area.

General Comments
Section 4.7.2.1
This section discusses four state-only-listed terrestrial mammals. After removing the jaguar from discussion, the third sentence states that "The remaining five…" This should state the remaining three, not five. SA02-26

Comment: The reference to five species should be corrected to "three" in the Final EIS.

Section 4.7.2.7
The last paragraph of this section refers to "measures described in section 4.7.2.4 for reptiles." Section 4.7.2.4 addresses fish, not reptiles. SA02-27

Comment: The reference in this section should be to Section 4.7.2.3, not 4.7.2.4.

SA02 continued, page 11 of 24

SA02-24 With regard to implementation of the TPWD recommendations, see response to comment SA2-14.

SA02-25 Comment noted.

SA02-26 The suggested correction has been made in section 4.7.2.1 of the final EIS.

SA02-27 The suggested correction has been made in section 4.7.2.7 of the final EIS.

Thank you for consideration of our comments. Questions can be directed to Ms. Jackie Robinson (361-825-3241) or Ms. Leslie Koza (361-825-2329) in Corpus Christi.

Sincerely,

Rebecca Hensley
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division

RH:LK:JR

Literature Cited

Longcore, T., and C. Rich. 2016. Artificial night lighting and protected lands: Ecological effects and management approaches. Natural Resource Report NPS/NRSS/NSNS/NRR-2016/1213. National Park Service, Fort Collins, Colorado.

TEXAS PARKS & WILDLIFE

Life's better outside.

January 29, 2019

Ms. Denise Sloan
U.S. Army Corps of Engineers
Galveston District, Regulatory Branch
P.O. Box 1229
Galveston, TX 77553-1229

Ms. Leslie Savage
Environmental Services Section
Texas Railroad Commission
P.O. Box 12967
Austin, TX 78711-2967

Re: Permit Application Number SWG-2015-00110
Annova LNG Common Infrastructure, LLC

Dear Ms. Sloan and Ms. Savage:

Texas Parks and Wildlife Department (TPWD) has reviewed the Public Notice (PN) dated December 27, 2018 for permit application number SWG-2015-00110. The applicant requests authorization to construct, install, operate and maintain structures and equipment necessary for the liquefaction and export of natural gas, including the construction of a gas supply pipeline and a liquefied natural gas (LNG) terminal with an access road and marine facilities. The proposed LNG terminal/gas supply pipeline project is located within an approximately 9.0-mile-long proposed pipeline corridor originating at the existing Valley Crossing Pipeline Brownsville compressor station north of State Highway 48 (SH48), crossing under SH48 and the Brownsville Ship Channel (BSC), and extending generally southeast to a fenced yard within the proposed LNG terminal site on the south bank of the BSC. The proposed LNG terminal site is located on an approximately 731-acre tract approximately 15 miles east of the City of Brownsville, in Cameron County, Texas.

Pipeline

According to the PN, the applicant proposes to construct and operate a 9.0-mile-long, 36-inch-diameter pipeline that would provide natural gas to the proposed liquefaction, storage, and export facility (Terminal). SA02-28

The pipeline would require a 50-foot-wide permanent operational ROW located within a 100-foot-wide temporary construction right-of-way (ROW) plus additional workspaces that have been identified within the project plans. Project documents associated with the PN do not quantify the area required for additional workspaces. Improved roadways and three temporary access roads would provide necessary access to the proposed pipeline during construction. No permanent access roads would be required to construct, operate, or maintain the gas supply pipeline. The applicant anticipates that construction over wooden mats would be required in wet areas and that construction and maintenance of the proposed gas supply pipeline would result in 42.1 acres of temporary impacts within 30.9 acres of wetlands and 11.2 acres of unvegetated tidal flats.

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SA02-28 This comment is specific to the supply pipeline which is the subject of the COE application. Since the supply pipeline is a FERC non-jurisdictional facility, FERC defers to the COE with regard to this comment.

Recommendation: The applicant should limit additional workspaces and access roads to uplands where practicable. SA02-28 Cont'd

According to the PN, efforts to avoid and minimize impacts along the pipeline ROW include traditional bores and horizontal directional drill (HDD) techniques. As a result, all impacts to estuarine scrub-shrub wetlands (mangroves) within the ROW and a portion of tidal flats and emergent wetlands within the ROW have been avoided. SA02-29

The use of HDD construction methods can avoid and minimize surface impacts, but the potential exists for dispersal of drilling fluid into the surrounding soils (lost circulation) or discharge to the surface at some random location (inadvertent returns or "frac-outs"). In short, a frac-out occurs when drilling fluid is inadvertently released from the drill hole to the surface of the soil or streambed/sea floor and potentially negatively impacts aquatic resources. The primary areas of concern for inadvertent releases occur at the entrance and exit points where the drilling equipment is at shallower depths. The likelihood of inadvertent return decreases as the depth of the pipe increases.

Recommendations: To reduce the potential of a frac-out (inadvertent return) affecting the sea floor, the applicant should

- Locate the entrance and exit points for drilling a minimum of 500 feet from the shoreline.
- Develop an Inadvertent Returns Contingency Plan for the entire project that includes site specific plans for addressing returns in shallow water habitats that are in or adjacent to submerged or emergent aquatic vegetation and tidal flats. Site specific plans should:
  - include preferred access routes and specific protocols and/or guidelines for developing containment and recovery strategies that aim to avoid and minimize secondary impacts from machinery, equipment, foot traffic, and drilling fluid
  - provide protocols and contact information for reporting inadvertent returns to the appropriate state and federal resource agencies
  - include consultation with TPWD when conducting an assessment of the impacts and determining required mitigation.

Project documents do not describe timelines for pipeline construction and post-construction activities, nor do they indicate if or where the construction ROW or additional workspaces will overlap with previously disturbed areas associated with recently installed or proposed pipelines (e.g., Valley Crossing Pipeline, Rio Bravo Pipeline, and Texas LNG Pipeline). It is not clear if previously disturbed areas will be completely restored prior to construction of this or other pipeline projects. Although TPWD generally recommends the use of previously disturbed areas, there SA02-30

SA02-29 See response to Comment SA2-28.

SA02-30 See response to Comment SA2-28.

is concern for cumulative and/or temporal impacts that could be caused by repeated disturbances to areas considered temporarily impacted by this and other projects. SA02-30 Cont'd

Recommendations: The applicant should

- Consider additional avoidance measures, such as additional HDD segments, to avoid cumulative and/or temporal impacts in large emergent wetland features, such as W-2.
- Avoid and/or minimize clearing native woody vegetation and native herbaceous communities (e.g., native grasslands) to construct new access roads or to accommodate heavy equipment access to project sites by
  - locating new access roads in previously disturbed areas, including previously cleared right-of-ways (ROWs), utility corridors, etc.,
  - improving existing roads (e.g., private farm and ranch roads).
  - locating staging areas for material and equipment in previously disturbed areas that do not require vegetation clearing.
- Actively prevent colonization by invasive species, particularly invasive grasses and weeds in disturbed areas through
  - the exclusive use of a mixture of native grasses and forbs for herbaceous revegetation efforts that will provide high quality grassland habitat able to support a diversity of wildlife species.
  - utilizing the Lady Bird Johnson Wildflower Center Native Plant Database (available online) for regionally adapted native species that would be appropriate for post-construction landscaping of disturbed areas.

TPWD also has concern for temporal and potentially permanent impacts to aquatic habitats that are difficult to restore, such as tidal flats. TPWD is not aware of any successful tidal flat restoration projects in Texas. Except for algal mats, comprised of algae and cyanobacteria, tidal flats are distinctly unvegetated. Small changes in elevation (on the scale of centimeters) can increase the extent and frequency of inundation. Increased water levels can make suitable foraging habitat inaccessible to small shorebirds, such as plovers, and can eliminate suitable foraging habitat altogether by promoting the establishment and growth of vascular plants. Changes in elevations that reduce water levels can also eliminate suitable foraging habitat by converting aquatic habitats to uplands. Algal mats, if present prior to construction, may not re-establish in disturbed areas. In addition to providing a source of fixed nitrogen to the estuary, algal mats trap and retain eolian and alluvial deposits over time by forming laminated sediments. There is concern that surficial sediments will not retain these attributes once they are re-worked by excavation and restoration activities. SA02-31

Recommendation: The applicant should avoid disturbances in tidal flats to the maximum extent practicable and should consider additional

SA02-31 See response to Comment SA2-28.

avoidance measures (e.g., multiple HDD segments) to avoid surface disturbances in large tidal flat features such as UF-3. SA02-31

The PN states that fill material in wetlands would be native material and would generally be restricted to spoil removed from the pipeline trench and, potentially, segregated topsoil. Contours would be restored to match preconstruction contours and excess material displaced by the pipeline will be deposited in nearby uplands. These statements do not adequately describe how uplands or aquatic habitats will be restored or describe post-construction monitoring activities that would be implemented to ensure restoration success. SA02-32

According to the Draft Environmental Impact Statement (DEIS) for the Annova LNG Brownsville Project dated December 2018 (Docket No. CP16-480-000), the site-specific Plans and Procedures were developed specifically for construction activities associated with the Terminal. Because the Federal Energy Regulatory Commission (FERC) considers the pipeline a non-jurisdictional facility, the evaluation of impacts within the DEIS associated with the pipeline are limited to the assessment of cumulative impacts. The proposed compensatory mitigation plan (CMP) provided with the PN states that impacts associated with the pipeline are expected to be temporary but does not detail construction or restoration methods within the pipeline ROW. SA02-33

Recommendations: The applicant should

- Segregate topsoil throughout the entirety of the pipeline ROW which ensures that good soil and the native seed bank, including rare species, remains intact and viable rather than being intermixed with subsurface soils or buried too deep to regenerate.
- Explore beneficial uses such as habitat restoration and enhancement for any suitable excavated materials (native soils and sediments) remaining post-construction.
- Consider construction debris comprised of woody vegetation for habitat restoration and enhancement activities.
- Identify construction and restoration methods (including success criteria and post-construction monitoring requirements) for aquatic habitats that would be disturbed by pipeline construction activities.
- Compensate for permanent and/or temporal impacts to estuarine emergent marsh and/or tidal flats at a minimum mitigation ratio of 2:1, or higher for out-of-kind mitigation strategies.
- Coordinate any dewatering activities with TPWD's Region 4 Regional Response Coordinator. Restoration activities that require the introduction of aquatic plants, or their propagules, into public waters will require prior authorization from TPWD.

TPWD requests the opportunity to review and provide comment on the methods that will be used to avoid permanent, temporal, and/or cumulative impacts to SA02-34

SA02-31 See response to Comment SA2-28.

SA02-32 See response to Comment SA2-28.

SA02-33 See response to Comment SA2-28.

SA02-34 See response to Comment SA2-28.

aquatic habitats resulting from pipeline construction including restoration methods, post-construction monitoring requirements, and success criteria. SA02-34

Terminal

The proposed Terminal would include two principal parts: LNG facilities and marine transfer facilities. The 731-acre terminal site would include gas pretreatment facilities; liquefaction facilities; LNG storage tanks; a boil-off gas handling system; a flare system; control, administration, and support buildings; an access road; and utilities for power, water, and communication. The site would be raised to a base elevation of +16.5 feet NAVD88.

Approximately 76 acres of marine transfer facilities would be dredged to a final depth of -45 feet mean lower low water (MLLW) to construct a 1,500-foot-diameter turning basin bisected by the BSC with adjacent approach area and marine berth. The marine berth would include an LNG loading berth and a marine offloading facility. The steel sheet pile bulkhead and shoreline would be armored with approximately 12.2 acres of riprap. Breasting dolphins, mooring dolphins, loading platforms, cryogenic pipelines, vapor return lines, and aids to navigation would also be constructed as part of the marine transfer facilities. Material excavated through land-based excavation and mechanical dredging would be used for non-structural fill and grading at the Terminal. The remaining material would be hydraulically dredged and placed in dredged material placement areas (PA) 5A and/or PA 5B. No dredging would occur within the BSC navigation channel. Other than for on-site construction, no other beneficial use of dredged material is proposed.

Current site conditions

The 731-acre Terminal site located south of the BSC on an undeveloped tract owned by the Brownsville Navigation District (BND) that has been historically managed by U.S. Fish and Wildlife Service (USFWS) as part of the Lower Rio Grande Valley National Wildlife Refuge known as the Loma Ecological Preserve. A large loma vegetated by dense mature thornscrub, known as Loma Del Potrero Cercado, parallels the BSC and a smaller loma, known as Loma Del Divisadero, occurs along the western side of the tract. Approximately 134.4 acres of wetlands and 26.9 acres of open water and tidal flats have been delineated on site. The Terminal site provides a mosaic of relatively undisturbed habitats comprised of Coastal Salt and Brackish High Tidal Marsh, Coastal Salty Flat/Depression, Salt and Brackish Wetlands, South Texas Saline Lake Grasslands, Coastal Sea Ox-eye Daisy Flats, Gulf Coast Salty Prairie, South Texas Loma Evergreen Shrubland, South Texas Loma Grassland/Shrubland, Coastal Mangrove, and South Texas Wind Tidal Flat. Most of the interior depressions are about 1 acre or less in size but five of these depressions range from about 5 acres to almost 50 acres. All of these depressions are within the 100-year floodplain associated with the BSC and South Bay and are dominated by common halophytic vegetation. Located on Loma Del Portrero Cercado, one emergent marsh is located outside the 100-year floodplain but is still dominated by halophytic vegetation.

The BSC is connected to several shallow water features, such as Laguna Madre, South Bay Coastal Preserve, San Martin Lake, and the recently restored Bahia Grande. Containing emergent marshes, mangroves, seagrass meadows, oysters, and tidal flats, these shallow water habitats provide critical nursery habitat for economically and ecologically important species of finfish, crabs, and shrimps. In addition, the BSC serves as a migration corridor which connects these shallow water habitats to the Gulf of Mexico. At the confluence of the Port Isabel Channel and BSC, other sensitive features include a rookery island that forms the "Y" and a compensatory mitigation site located at the southern end of Long Island.

During both construction and operations, TPWD has concern for individual and cumulative effects to sensitive shallow water habitats from turbidity associated with initial excavation and dredging, maintenance dredging at each project site as well as within the BSC, and the increased potential for erosion due to increased ship traffic. SA02-35

> **Recommendations:** During dredging and disposal activities, the applicant should implement Best management practices, such as turbidity curtains and protective criteria for return water discharges, to reduce the effects of turbidity within the migration corridor (i.e., BSC) and connected shallow water nursery habitats. The cumulative impacts associated with dredging and ship wakes should be assessed and proactive measures, such as shoreline stabilization, should be taken to avoid and minimize the effects of ship wakes which contribute to habitat loss and degradation through erosion and elevated turbidity levels.

Approximately 2.5 acres of wetlands and 2.7 acres of non-wetland waterbodies would be temporarily disturbed from initial clearing for construction of a fence and would be allowed to revert to pre-existing land covers after the fence installation is complete. The PN and associated documents do not provide an adequate description of the disturbance activity or the aquatic habitats that would be affected. Most of the non-wetland waterbodies described in the PN are tidal flats. Because tidal flats are unvegetated, except for algal mats, they would not require clearing of vegetation. SA02-15

> **Recommendation:** The applicant should describe both the proposed activity and the aquatic habitats that may be affected by the proposed activity in greater detail to determine if impacts will indeed be temporary. For reasons detailed in the Pipeline section above, temporary disturbances and permanent impacts in tidal flats should be avoided to the maximum extent practicable. Any unavoidable disturbances that result in temporal or permanent impacts to tidal flat function should be compensated at a minimum mitigation ratio of 2:1, or higher for out-of-kind compensation.

SA02 continued, page 18 of 24

SA02-35 This comment addresses issues that are the subject of the COE permit application and under the jurisdiction of the COE, and as we understand are currently under review by the COE. Therefore, we defer to the COE with regard to this comment.

SA02-15 See response to Comment SA2-35.

Compensatory Mitigation Plan (CMP)

The applicant states that through collaborative efforts with natural resource and regulatory agencies, over 100 acres of wetlands and non-wetland waterbodies within the Terminal site would be avoided. Unavoidable impacts from the Terminal would include approximately 49.5 acres of estuarine emergent wetlands (plus 2.2 acres for Access Road Alternative 1 or 1.3 acres for Access Road Alternative 2) and 1.0 acre of estuarine open water and 1.0 acre of unvegetated tidal flat. To compensate for these impacts, the applicant proposes to restore hydrology to Little San Martin Lake basin (LSML) that was cut off by construction of access roads between 1955 and 1970 for oil and gas activities. SA02-36

Objectives

Restoring regular tidal flow is expected to restore and enhance wetlands and shallow waters in and around LSML. Specifically, the plan would restore up to 71 acres of estuarine wetlands, enhance approximately 94 acres of estuarine wetlands, and restore 58 acres of shallow water habitats.

Site Selection

The proposed mitigation site is located within a Perpetual Drainage Easement (PDE) controlled by the Brownsville Navigation District (BND) that occurs within the USFWS' Bahia Grande Unit of the Laguna Atascosa National Wildlife Refuge (LANWR). The BND secured the PDE prior to the USFWS acquiring the property. The proposed mitigation site was previously approved as mitigation for the BND's Port of Brownsville International Crossing Project that was authorized in 1995 and amended in 1999. The project, which was never built, expired in 2001 and the mitigation plan was never constructed. The proposed mitigation plan is similar to, but larger than, the previously approved mitigation project within the BND's PDE.

Site Protection Instrument

The CMP states that the mitigation site would be protected through a combination of USFWS-owned land and legal instrument that would protect the mitigation area from future disturbance by BND under the PDE. Annova will work with BND to create and execute a legal instrument that will further protect the mitigation site.

> **Recommendation:** The CMP should provide a more detailed explanation of the instrument and how it will protect the mitigation site and who would be the controlling party of the conservation easement.

Determination of Credits

The CMP states that in consultation with USACE, wetland functions were assessed using the hydrogeomorphic model (HGM) for tidal fringe wetlands (Shafer et al. 2002) and that USACE staff verified that the Tidal Fringe HGM would apply to the wetlands in the project area because they are adjacent to tidal waters. In addition, USACE staff also recommended using the "full" Tidal Fringe HGM rather than the interim HGM. The HGM was determined unsuitable for assessing tidal flats or SA02-37

SA02-36 See response to Comment SA2-35.

SA02-37 See response to Comment SA2-35.

other non-wetland waterbodies however the CMP does not identify how impacts to tidal flats will be compensated. SA02-37 Cont'd

TPWD continues to have concern for the use of the Tidal Fringe HGM in the lower coast region of Texas. The lower coast of Texas differs from the mid and upper coasts in terms of climate, geology and typical vegetation. Along a latitudinal gradient from the upper coast to the lower coast, the climate becomes increasing warmer and drier. Geologically, the Gulf Coast Prairies and Marshes of the mid and upper coasts are primarily located within the Beaumont Formation where many tidal fringe wetlands are dominated by expansive complexes of Spartina marsh. Moving southward along the Laguna Madre, the primary geologic formation transitions from the Beaumont Formation into the South Texas Sand Sheet where Spartina marshes become increasingly less abundant. SA02-38

Shafer et al. (2002) cautions against the use of the Tidal Fringe HGM south of Matagorda Bay due to a lack of reference sites occurring in this region. TPWD is not aware of any projects that have successfully demonstrated the validity of the Tidal Fringe HGM in this region. Historically, impact assessments in this region have been based on the areal extent of impacts to each type of special aquatic site and compensation is provided at a minimum 1:1 ratio. In general, tidal marsh impacts are compensated at a minimum ratio of 2:1.

Recommendation: The CMP should state how tidal flat impacts would be compensated. Because tidal flats are difficult to replace, they are usually compensated through an out-of-kind strategy which should exceed 2:1.

Mitigation Work Plan

The mitigation project would be achieved by excavating approximately seven (7) acres of open water channels between San Martin Lake and LSML basin and by excavating and/or filling areas within the mitigation site. Once excavated, channel margins would be planted with emergent wetland vegetation. Emergent wetlands are expected to gradually establish throughout the flats surrounding the basin. Dredged material would be deposited in an appropriate upland site, existing PA, or on-site to establish target elevations for marsh establishment. SA02-40

Recommendation: The applicant should

- Design the project to avoid the formation of shallow tide pools or depressions that can lead to fish kills during extreme temperature events and/or low tides.
- Develop a plan to beneficially utilize suitable excavated materials to address historic and future habitat losses associated with sea level rise, erosion, and alterations to the sediment budget while helping to increase disposal capacity within existing PAs.

SA02-38 See response to Comment SA2-35.

SA02-40 See response to Comment SA2-35.

Maintenance Plan
The CMP states that after the mitigation site achieves the success criteria, it will be managed and protected by the USFWS refuge system in accordance with their goals and management plan. This statement appears to be inconsistent with the site protection instrument which is described as being under the control of BND. SA02-41

Recommendation: The CMP should provide a more detailed explanation of the instrument and who would be the controlling party of the conservation easement.

Performance Standards
The CMP states that the performance standard requiring 40% percent cover by native wetland species by the end of the monitoring period is based on vegetation cover in existing wetlands. The CMP does not identify the reference site that this standard is based on and does not provide incremental goals over the course of the monitoring period to evaluate if the project is trending toward success. Without incremental goals, there may be insufficient time to implement corrective actions. The CMP states that nuisance, invasive, noxious, or exotic plant species, while not expected, will be limited to less than 15% cover. SA02-42

Recommendations: The CMP should

- Include incremental goals over the course of the 5-year monitoring period so that the project manager can determine if the project is trending toward success.
- Identify a reference site for the mitigation project and performance standards based on a percentage of the vegetative cover of the dominant plant communities present at the reference site during the monitoring event.
- Limit nuisance, invasive, noxious, or exotic plants to less than 5% cover.

Monitoring Requirements
The CMP discusses monitoring requirements in terms of the performance standards. TPWD recommended changes to the performance standards. SA02-43

Recommendation: The applicant should revise this section to reflect recommended changes to the performance standards.

Long-Term Management Plan
The CMP again states that the site will be managed and protected by the USFWS in accordance with their goals and management plan but that the legal instrument tied to the BND's PDE surrounding the mitigation site will also protect the mitigation site. This information does not help elucidate the nature of the PDE or explain how it will protect the site. SA02-44

SA02-41 See response to Comment SA2-35.

SA02-42 See response to Comment SA2-35.

SA02-43 See response to Comment SA2-35.

SA02-44 See response to Comment SA2-35.

Recommendation: The CMP should provide a map identifying the location and extent of the PDE boundary within the Bahia Grande Unit of LANWR. SA02-44 Cont'd

Plans and Procedures

As previously mentioned, the DEIS states that the site-specific Plans and Procedures were developed specifically for construction activities associated with the Terminal. To help avoid and minimize impacts to state fish and wildlife resources, the site specific Plans and Procedures should be revised to include construction activities associated with the Pipeline. TPWD requests the opportunity to review and provide comments on revised Plans and Procedures. TPWD provides the following recommendations for the Plans and Procedures developed for the Terminal. SA02-45

Plans

- Dewatering activities (as described in Section 2.2.7.) should be coordinated with TPWD's Region 4 Response Coordinator to avoid and minimize harm to aquatic organisms.
- If the use of imported soils for revegetation and seeding (as described in Section 2.2.11.) is not anticipated, then it should not be included in the plans and procedures.
- With consent of the landowner, TPWD encourages the beneficial reuse of woody vegetation and native soils and sediments for habitat restoration and enhancement activities. The list of excess construction materials and debris included in Section 3.5. should specifically include "excess native soils and sediments" for consideration of beneficial reuse. SA02-46
- Section 7.1. Monitoring and maintenance does not address routine mowing or clearing of vegetation. Routine mowing and clearing should be avoided during the migratory bird nesting season. SA02-47

Procedures

- Except for the Brownsville Ship Channel crossing, Section 2.B. does not address plans for horizontal directional drills (HDD). Site specific inadvertent release plans should be developed for all HDD crossings, especially those occurring under shallow water habitats. Plans should include considerations of appropriate equipment for the depth of water, access routes, staging areas, containment strategies, effects of winds and tides on water depths, and other environmental factors. TPWD requests the opportunity to review site specific inadvertent release plans in order to provide additional information about sensitive aquatic resources and recommendations that can help further avoid and minimize impacts to those resources. SA02-48
- According to Section 5.B.5., equipment bridges are to be constructed and maintained to allow unrestricted flow and to prevent soil from entering the waterbody during installation. To avoid and minimize the potential for SA02-49

SA02-45 See response to Comment SA2-35.

SA02-46 See response to Comment SA2-35.

SA02-47 See response to Comment SA2-35.

SA02-48 See response to Comment SA2-35.

SA02-49 See response to Comment SA2-35.

mortalities of fish and aquatic life, unrestricted flow should be maintained under all flow conditions, with special attention given to minimum and maximum flows. SA02-49 Cont'd

- Sections 5.B.11. and 6.B.4. pertain to erosion associated with dewatering procedures in waterbodies and wetlands during installation. These Procedures do not address measures to avoid and minimize impacts to fish and wildlife resources that can occur as a result of dewatering activities in aquatic habitats. TPWD requests that dewatering activities be coordinated with TPWD's Region 4 Response Coordinator so that potential impacts to fish and wildlife resources can be avoided and minimized to the extent practicable. SA02-50
- According to Section 5.C.1., synthetic monofilament mesh/netted erosion control materials are not to be used in areas designated as sensitive wildlife habitat unless the product is specifically designed to minimize harm to wildlife. TPWD is not aware of any products specifically designed to minimize harm to wildlife. Because the project would not occur in residential or urbanized areas, sensitive wildlife habitats are likely to occur throughout the project area. SA02-51
- If restoration or stabilization activities described in Section 6.C.6. require the introduction of aquatic plants (including propagules) into public waters, a permit may be required from TPWD. The introduction of aquatic plants or their propagules should be coordinated with TPWD to determine if a permit is required. For information about this permit, please contact Paul Silva in Corpus Christi at 361-825-3204. SA02-52

Questions can be directed to Ms. Jackie Robinson (361-825-3241) or Ms. Leslie Koza (361-825-2329) in Corpus Christi.

Sincerely,

Rebecca Hensley
Regional Director, Ecosystem Resources Program
Coastal Fisheries Division

RH:LK:JR

Literature Cited

Shafer, D. J., B. Herczeg, D.W. Moulton, A. Sipocz, K. Jaynes, L.P. Rozas, C.P. Onuf, and W. Miller. 2002. Regional guidebook for applying the hydrogeomorphic approach to assessing wetland functions to northwest

SA02 continued, page 23 of 24

SA02-50 See response to Comment SA2-35.

SA02-51 See response to Comment SA2-35.

SA02-52 See response to Comment SA2-35.

Gulf of Mexico tidal fringe wetlands. ERDC/EL TR-02-5, U.S. Army Corps of Engineer Research and Development Center, Vicksburg, MS.

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RAILROAD COMMISSION OF TEXAS

P.O. Box 12967
Austin, Texas 78711-2967
(512) 463-7140
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CHRISTI CRADDICK
CHAIRMAN

March 1, 2019

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

Dear Secretary Bose:

I would like to express my support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. SA03-01

Texas is leading the world in producing an abundant supply of natural gas and Annova LNG can help this great state export it safely and efficiently to our allies around the world. This project is also expected to create 700 construction jobs and 165 high-paying permanent jobs. SA03-02

I'm proud of what Annova LNG has done to work collaboratively with local and federal environmental stakeholders to include a 185-acre environmental conservation corridor and avoid impacting over 100 acres of coastal wetlands. In addition, the project proposes the restoration and enhancement of over 250 acres of wetlands and shallow water habitat. SA03-03

For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement.

Sincerely,

Christi Craddick

Christi Craddick
Chairman, Railroad Commission of Texas

SA03 Railroad Commission of Texas, page 1 of 1

SA03-1 Thank you for your comment.

SA03-2 Thank you for your comment.

SA03-3 Thank you for your comment.

20190315-0010 FERC PDF (Unofficial) 03/15/2019

ORIGINAL

RAILROAD COMMISSION OF TEXAS

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WAYNE CHRISTIAN
COMMISSIONER

FILED
SECRETARY OF THE COMMISSION
2019 MAR 15 P 1:38
FEDERAL ENERGY REGULATORY COMMISSION

March 6, 2019

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

Secretary Bose,

Thank you for your steadfast service on the Federal Energy Regulatory Commission (FERC), your work is helping ensure American energy security as our nation leads the world in the exploration and production of natural gas.

I would like to express my support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, the FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. Texas is blessed with an abundant supply of natural gas, and it's important that it is used safely and prudently. Projects like this ensure Texas is able to export and get its products to market. SA04-1

Upon review of the application and FERC's thorough review process, I believe the Annova LNG project will be a great addition to our state. I appreciate the proactive steps Annova LNG has taken to minimize its impact on the environment. In addition to proposing to mitigate more than 250 acres that were damaged by previous development, Annova LNG moved its site layout to accommodate a wildlife corridor. This measure demonstrates they are willing to be a good neighbor and meet or exceed local, state and federal rules and regulations. SA04-2

We also cannot overlook the positive economic impact on the Rio Grande Valley, which would include 700 construction jobs and 165 high-paying permanent jobs. For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according its schedule. SA04-3

Sincerely,

Wayne Christian
Railroad Commissioner
State of Texas

SA04 Railroad Commission of Texas, page 1 of 1

SA04-1 Thank you for your comment.

SA04-2 Thank you for your comment.

SA04-3 Thank you for your comment.

PORT OF BROWNSVILLE
the port that *works*

January 29, 2019

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

Dear Secretary Bose:

On behalf of the Port of Brownsville, I would like to express our continued support for the Annova LNG project in Brownsville, Texas. The Annova LNG project will create meaningful economic opportunities for the Rio Grande Valley residents and businesses. LA01-1

The Port of Brownsville is the only deep-water seaport located directly on the U.S./Mexico border. We are a large land-owning public port authority with approximately 40,000 acres of land. Annova LNG plans to construct and operate a natural gas liquefaction and export facility on our ship channel. The Annova LNG project will help the state of Texas export LNG safely and efficiently, which will in turn help our great nation mitigate trade deficits with key allies and improve the global environment through the provision of clean-burning, U.S. produced natural gas. LA01-2

On December 14, 2018, FERC issued its Draft Environmental Impact Statement for the Annova LNG project (Docket No. CP16-480-000). We appreciate FERC's thoughtful and diligent review of the Annova project, and Annova LNG's proactive environmental mitigation efforts – including the use of electric driven motors to reduce air emissions – are commendable. LA01-3

Working collaboratively with the Port of Brownsville and other local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands, as well as other measures to protect land that contains habitat suitable for the ocelot. Furthermore, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat in the Project vicinity. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. LA01-4

We urge FERC to issue its Final Environmental Impact Statement and final authorization to Annova LNG according to its schedule. We look forward to welcoming the Annova LNG facility to the Port of Brownsville, as an environmentally and socially responsible addition to our region.

Sincerely,

Eduardo A. Campirano
Port Director & CEO
Port of Brownsville

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LOCAL AGENCIES

LA01 Port of Brownsville, page 1 of 1

LA01-1 Thank you for your comment.

LA01-2 Thank you for your comment.

LA01-3 Thank you for your comment.

LA01-4 Thank you for your comment.

SUNTRACK SUPPLY SERVICES INC.

state export it safely and efficiently. Annova LNG's proactive environmental mitigation efforts – including the use of electric driven motors to reduce air emissions – are commendable. CO01-1

Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area.

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. CO01-2

For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according its schedule.

Ankjaer Jensen

President

Suntrack Supply Services Inc.

1405B FM 803 Olmito

Texas 78575 U.S.

956-831-0331 Office

956-454-6190 Cel.

COMPANIES AND ORGANIZATIONS

CO01 Suntrack Supply Services, Inc, page 1 of 1

CO01-1 Thank you for your comment.

CO01-2 Thank you for your comment.

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500 E. Saint Charles Street
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P 956.561.4133

Greater BROWNSVILLE

ORIGINAL

January 18, 2019

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

2019 JAN 25 P 2:32

Dear Secretary Bose:

I am writing to express my unwavering support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. CO02-1

As the Executive Director & CEO of the Greater Brownsville Incentives Corporation, I am responsible for developing and implementing strategies that help attract industry to our region. GBIC is the economic development arm for the City of Brownsville and is a leader in providing job creation incentives and various grant programs related to infrastructure and education.

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. From an economic development perspective, this project will have a significant economic impact in housing, retail sales and help stimulate indirect jobs. The project is in direct alignment with our diverse industry portfolio and has the potential to transform this region.

Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. CO02-2

For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according to its schedule.

If you have any questions, please feel free to contact me at (956) 561-4133 and/or by email at mlozoya@greaterbrownsville.com.

Sincerely,

Mario Alberto Lozoya
Executive Director & CEO

CO02 Greater Brownsville Incentives Corporation, page 1 of 1

CO02-1 Thank you for your comment.

CO02-2 Thank you for your comment.

ORIGINAL

January 15, 2019

STMA
SOUTH TEXAS MANUFACTURERS ASSOCIATION

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

Dear Secretary Bose:

We would like to express our unwavering support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. CO03-1

After a careful review of the matter, we have found that Texas has an abundant supply of natural gas, and Annova LNG can help this great state export it safely and efficiently. Annova LNG's proactive environmental mitigation efforts – including the use of electric driven motors to reduce air emissions – are commendable. CO03-2

Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. CO03-3

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. CO03-4

For these reasons, we support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according its schedule.

Sincerely,

Pamela de la Garza
President
South Texas Manufacturers Association

CO03 South Texas Manufacturers Association, page 1 of 1

CO03-1 Thank you for your comment.

CO03-2 Thank you for your comment.

CO03-3 Thank you for your comment.

CO03-4 Thank you for your comment.

Twenty Years of Ocelot Conservation
1997-2017

Friends of Laguna Atascosa National Wildlife Refuge

February 4, 2019

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

The Friends is a 501(3)(c) non-profit organization whose mission it is to protect, support and enhance the Laguna Atascosa National Wildlife Refuge

Friends of Laguna Atascosa National Wildlife Refuge

22817 Ocelot Road,
Los Fresnos, TX 78566

Jolaine Lanehart, Mgr.

Office: 956-748-3607
Mobile: 956-832-3905

The Friends of Laguna Atascosa National Wildlife Refuge, hereinafter referred to as FLANWR, hereby submits this comment regarding the DEIS for Annova LNG, Docket No. CP16-480-000.

The mission of the Friends of Laguna Atascosa National Wildlife Refuge is to educate the public regarding the flora, fauna, and natural environment of the Refuge, through functions and educational events, promote public support for the Refuge by encouraging and organizing volunteer services, and solicit public donations for use in supporting, assisting, and enhancing ongoing conservation projects on the Refuge.

OPERATIONAL IMPACTS ON LAGUNA ATASCOSA NWR

CO04-1

The DEIS states, "the Laguna Atascosa NWR would not have any Project components constructed within the NWR; however, impacts on the Bahia Grande Unit of the Laguna Atascosa NWR may occur during construction and operation, including disturbance from increased noise, nighttime lighting, and dredging within the BSC."

Light and sound are physical alterations to the environment and should be considered as an operational footprint. Considering the Project location with national wildlife refuge parks to the north and south, the operational footprint of Annova LNG should be limited to its project boundaries. The FLANWR is opposed to physical alterations to the Laguna Atascosa NWR environment, including sound and light. The "Facility Lighting Plan" has significant wildlife implications and should be required by FERC to be included in the DEIS. Thus, the commenting period should be extended until such time that this plan is submitted and available for agency review, public review, and commenting.

CO04-2

Construction noise would be audible at off-site locations, including within the Bahia Grande Unit of the Laguna Atascosa NWR. This noise impact could continue periodically, depending on the phase of construction, for up to four years. This will have an economic impact on the Laguna Atascosa NWR and to local economies due to decreased visitation. The impact of construction noise on the Laguna Atascosa NWR is understated and not reflected in the socioeconomic analysis.

www.friendsoflagunaatascosa.org
www.SaveTexasOcelots.org

CO04 Friends of Laguna Atascosa National Wildlife Refuge, page 1 of 4

CO04-1 We disagree that areas that would experience light and sound from the Project should be considered part of the Project footprint, however the EIS does evaluate light and sound impacts on areas surrounding the Project, as appropriate. It is typical that some plans, such as the Facility Lighting Plan, are not prepared until projects advance into the final design phase. We will evaluate the Facility Lighting Plan when it is filed, and the public will also have the opportunity to review and comment at that time.

CO04-2 The EIS acknowledges there would be impact on the Laguna Atascosa NWR from noise during construction. Impact to the southern portion of the refuge along SH48, including to birders, is described in section 4.8.4.2 of the EIS. Impact from construction noise is discussed in section 4.11.12. The FEIS discussion of socioeconomics in section 4.9.2.2 has been revised to include references to the EIS sections on noise and visual impacts.

Twenty Years of Ocelot Conservation
1997-2017

The DEIS states (p ES-5) "Sediment-laden water could be transported into the Bahia Grande and result in a potential for some increased turbidity and sedimentation effects near the channel entrance …" This is not acceptable for what was the largest wetland restoration in North America in 2005. CO04-3

The DEIS erroneously states that the Bahia Grande was itself a mitigation site. The project was partially initiated because of public health concerns of dust from the dry basin causing respiratory health problems and infrastructure problems. The restoration project consisted approximately 65 groups and organizations in combination of government and non-government that included millions in tax-payer dollars. CO04-4

SOCIOECONOMICS

The FLANWR concludes that construction and operation of the Project would interfere or diminish the quality and experience with regards to the Laguna Atascosa NWR, particularly in the Bahia Grande Unit. This negates from economic benefits claimed by the Applicant. Thus, the FLANWR view the economic analysis by the Applicant is inadequate and narrow in view. Impacts on all types and areas of recreation and tourism, which includes the Laguna Atascosa NWR, during years of construction and operation should be reflected in the economic analysis. The analysis should be in concert with those that would be affected such as the FLANWR, area businesses, eco-tour guides, etc. CO04-5

Micro and macro costs of climate change are not included in the economic analysis. Costs imposed on the Laguna Atascosa NWR will increase during years of operation due to the consequences of climate change of which Annova will contribute significantly to, especially when considering the value chain of LNG. CO04-6

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. Additionally, the supply of gas has also not been confirmed. Valley Crossing has not confirmed that any agreements have been made for connections to their pipeline. Valley Crossing specifically communicated to FERC that the Valley Crossing Project Pipeline is not designed to provide gas for LNG projects. CO04-7

WILDLIFE AND HABITAT

The Laguna Atascosa NWR ocelot population is the closest resident subpopulation to the Project area and is located approximately 11 miles north of the Project. As such, the FLANWR considers any impact, or potential impact on ocelots as an impact on the Laguna Atascosa NWR. CO04-8
Ocelots have previously been documented in and around the Project area. The Project is located within a region considered by the FWS as being an important

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www.SaveTexasOcelots.org

CO04 continued, page 2 of 4

CO04-3 Section 4.3.2.2 of the EIS describes the potential impact on the Bahia Grande from sedimentation from Project dredging.

CO04-4 The Final EIS has been revised to refer to the Bahia Grande restoration project rather than mitigation project.

CO04-5 The EIS includes analysis of potential impacts on socioeconomics beyond the study that was completed by Annova. See also response to comment CO4-2.

CO04-6 The potential contribution of the Annova Project on climate change is evaluated in section 4.13.3.9 of the EIS.

CO04-7 See Section 1.2.10 of the EIS. The DOE has exclusive jurisdiction over the export of natural gas as a commodity. DOE has delegated to the Commission authority to approve or disapprove the construction and operation of particular facilities. The facilities are considered the site at which such facilities would be located, and with respect to natural gas that involves the construction of new domestic facilities, the place of entry for imports or exit for exports. However, the DOE Secretary has not delegated to the Commission any authority to approve or disapprove the import or export of the commodity itself as part of the Commission's public interest determination. With respect to the connection to the Valley Crossing Pipeline System, in a filing with the Commission on March 25, 2019 (accession number 20190325-5179), Annova acknowledged that design changes to the Valley Crossing Pipeline system would be required to accommodate the natural gas supply required for the Annova LNG Project. Annova anticipates the design changes could include expansion of the Valley Crossing receipt header system and addition of approximately 150,000 hp of new compression. See updated section 1.4.1 of the final EIS.

CO04-8 Potential Project impacts on the ocelot and jaguarundi are addressed in section 4.7.1 of the EIS, as well as in the Biological Assessment that FERC submitted to the U.S. Fish and Wildlife Service (FWS) on February 15, 2019 (see FERC accession number 20190215-3006). The final determination of effect, and how that may impact authorization of the Project, is pending completion of consultation with the FWS.

component of the coastal ocelot corridor connecting Texas and Mexico. The current size and distribution of loma thornshrub in the vicinity of the Project site may support transient or resident ocelots. Constructing and operating the Project would result in the loss of suitable ocelot and jaguarundi habitat, which could affect their movement resulting in avoidance and displacement. The Project would result in the permanent loss of 127 acres of Loma Evergreen Shrubland, which is considered preferred habitat for ocelots and jaguarundis. FERC concludes that constructing and operating the Project may affect, and is likely to adversely affect the ocelot and jaguarundi. Habitat at the Project site serves as connectivity to ocelot populations north of the Project area to southern populations in Mexico. Destruction of these habitats contributes to habitat loss, degradation, and fragmentation. Thus, according to Section 7 of the ESA, a permit should be denied. CO04-8 Cont'd

The modified project layout to accommodate a wildlife corridor on the west side of the Terminal project site should not be considered by FERC, or by the USACE, as effective avoidance and minimization. The FLANWR view the wildlife corridor as important to biodiversity of the region, but oppose the modified project layout because it results in the destruction of lomas, which provide essential ecological functions and wildlife habitat, including suitable ocelot habitat. The FLANWR is opposed to the destruction of lomas, which are essential and irreplaceable ecological features in the region. The importance of lomas to the ecology is not represented in the DEIS nor is the impact and consequences of loma destruction. CO04-9

Furthermore, the modified project layout should not be deemed acceptable by FERC. The DEIS for Rio Grande LNG references impacts on the wildlife corridor that will result in an environment that wildlife will likely avoid. Annova's destruction of loma's to accomodate a wildlife corridor that wildlife will avoid because of impacts by Rio Grande LNG is a conflicting cumulative impact overlooked by FERC. The cumulative analysis for Rio Grande LNG, Texas LNG, and Annova LNG is lacking and does not identify the conflicts each project is posing to the mitigation proposals by Annova LNG, Rio Grande LNG, and Texas LNG. Further cumulative analysis is needed to identify conflicts between the projects and mitigation proposals.

OTHER FACTORS AND TRENDS

It must be noted that many years and efforts towards conservation and preservation of native land and habitat have occured in the region where the Project is proposed. This demonstrates strong social and cultural values to conservation and preservation of native habitat. These efforts have included citizens and organizations at all levels from municipal to federal and has led to the creation of, but not limited to; CO04-10

1. Lower Rio Grande Valley NWR
2. The Laguna Atascosa NWR
3. Loma Ecological Preserve

CO04 continued, page 3 of 4

CO04-9 Annova developed the proposed Project layout in consultation with the FWS. FERC acknowledges the current layout presents tradeoffs with respect to habitat impacts, but addresses the impacts of the current layout in the EIS. The cumulative impacts discussion with respect to the ocelot has been revised in the Final EIS, see section 4.13.3.5.

CO04-10 Comment noted. The EIS addresses the potential impacts of the Annova Project on the resources listed, and addresses the potential cumulative impacts of the Annova Project combined with the TX LNG and Rio Grande LNG projects. The Commission will consider these potential impacts in its decision whether or not to authorize (permit) the Annova Project.

4. Wildlife Corridor
5. Bahia Grande Restoration Project
6. Federal Ocelot Recovery Plan
7. The recent conservation of 3,200 acres on South Padre Island and several hundred acres along the Bahia Grande near Port Isabel

CO04-10 Cont'd

LNG projects negate the work and continued efforts of the citizens, organizations, government resources, and millions of dollars put forth over the time span of many decades. Thus, permitting of LNG projects that pose direct and indirect impacts outside of the Port of Brownsville boundaries should be denied. LNG projects negate from the monies and efforts and are in direct conflict with social and cultural values of the region and should be denied permits. Permitting of LNG projects that continue the trend of destroying that last remaining ecosystems in the RGV should be denied.

The Living Wildlife Report found in its latest Living Planet Index that the wildlife population has declined by 60% in the last 40 years worldwide. Between 95-98% of the native landscape in the RGV has been cleared for urban, agricultural, or industrial use. About 91% has been destroyed in Cameron County, where the terminal will be built. Given the macro and micro trends, this places native habitat in our region at a greater importance and value. The location of Annova LNG further segments habitat and will impact wildlife migration between the Laguna Atascosa and Lower Rio Grande Valley Refuges. The direct and indirect impacts will have a large scale impact environmentally. CO04-11

Conclusory Statement

The FLANWR oppose the Annova LNG project. As stated throughout the DEIS there are too many costs (e.g. social, economic, environmental, etc.) to justify permitting LNG projects such as Annova. The Applicant has not demonstrated need for the Project nor is it stated in the DEIS. There are no buyers for the LNG no "binding contracts." For a project with so many negative impacts an unequivocal need for the Project must be shown. For this reason, and all the reasons aforementioned, the permit for Texas LNG should be denied. CO04-12

Nicole Eckstrom, President
Friends of Laguna Atascosa National Wildlife Refuge

CO04-11 Comment noted. Potential impacts on wildlife habitat, including from segmenting habitat within the wildlife corridor between the Laguna Atascosa and Lower Rio Grande Valley NWRs, is evaluated in the EIS.

CO04-12 Comment noted. See responses to individual comments above.

No attachement publicly available regarding #2

4 Houston Center
1221 Lamar Street, Suite 750
Houston, TX 77010

February 4, 2019

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

Re: Annova Comments on Draft Environmental Impact Statement
Annova LNG Common Infrastructure, LLC, et al., Docket No. CP16-480-000

Dear Ms. Bose:

On July 13, 2016, Annova LNG Common Infrastructure, LLC, Annova LNG Brownsville A, LLC, Annova LNG Brownsville B, LLC, and Annova LNG Brownsville C, LLC (collectively, "Annova") filed with the Commission an Application for Authorization under Section 3 of the Natural Gas Act to site, construct, and operate new liquefaction and export facilities located on the Brownsville Ship Channel in Cameron County, Texas. Annova respectfully submits these comments on the Federal Energy Regulatory Commission's (FERC) December 14, 2018, Draft Environmental Impact Statement (DEIS) for the Annova LNG Brownsville Project (Project).[1] Annova is providing 1) responses to the recommended conditions for which FERC requested a response prior to the end of the public comment period, 2) requests for clarification on certain recommendations, and 3) comments on the analysis and conclusions in the DEIS. We also provide additional information to support FERC in preparing the Final Environmental Impact Statement (EIS).

1. Responses to Recommended Conditions Requiring a Response Prior to the End of the Public Comment Period.

Attachment 1 provides the responses to the six recommended conditions 18, 23, 24, 25, 26, and 27 that require a response by February 4, 2019. With respect to Recommendation 18, which requests identification of the construction-phase parking lot, Annova is providing a detailed description of the proposed parking areas, environmental impacts, and restoration after construction. However, Annova is currently in discussions with the landowners for an option to lease and cannot disclose the exact location of the proposed construction parking lot. We anticipate those negotiations will be completed by March 15, 2019 and will notify FERC and provide the location of the parking area immediately afterwards.

[1] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018).

2. Comments on Certain Recommendations Requesting Clarification.

Attachment 2 provides a table of recommended conditions 17, 35, 36, and 37 for which Annova requests clarification. Annova is initiating work to comply with these requirements and we believe that the requested clarifications will ensure an accurate and complete response.

3. Comments on the DEIS to Request Clarifications and Provide Additional Information.

Annova appreciates FERC's efforts to prepare a DEIS that is both thorough and concise. Attachment 3 provides a summary table of areas in the DEIS where Annova requests clarification or provides additional information that updates the analysis and conclusions.

Annova also requests that FERC clarify the Project's potential contribution to cumulative impacts with more quantitative comparisons. The quantitative approach normalizes impacts across different types of projects but also differentiates projects of similar type based on their relative size. Such is the case with the three liquefied natural gas (LNG) facilities proposed for the Brownsville Ship Channel area. With proposed export capacity of 27 million tonnes per annum (mtpa) by Rio Grande LNG, 6 mtpa by the Project, and 4 mtpa by Texas LNG, certain, if not most, impacts from the same types of projects will be differentiated based on the capacity of the facility. All three LNG facilities use the same design for liquefying natural gas, storing LNG, and conveying LNG into ships for export. Some characteristics of design and operation are proportional to the project size; therefore, some impacts are also proportional, such as vehicle traffic during construction, the number of LNG carriers required, and the size of physical disturbance areas. CO05-1

The DEIS includes some quantitative analysis of the Project's contribution to cumulative impacts, specifically vehicle and vessel traffic, and noise. Although these analyses were limited to the three LNG projects in the area (the Project, Texas LNG, and Rio Grande LNG), they quantified or clarified the Project's contribution to the potential cumulative impact. We note that Table 4.13.3-1, Summary of Cumulative Impacts, provides much of the quantitative inputs necessary to illustrate Annova's contribution.[2] However, we believe the presentation in the DEIS does not describe Annova's contribution to the cumulative impacts. We illustrate below a modification to Table 4.13.3-1, Summary of Cumulative Impacts, shown in ***bold italics***, that presents Annova's percent contribution to the total quantifiable impacts. As shown in the table, the cumulative effects on certain resources may be substantial; however, the incremental addition of the Annova Project would be minor: 15 percent or less on 5 of the 11 types of impacts when considering all of the projects in the cumulative analysis. We also suggest that Table 4.13.3-1 document when FERC made a quantitative comparison of just the three LNG projects, shown in the last row of the table below illustrating the quantitative contribution of the Project. Annova presumes that FERC chose a quantitative comparison of just the three LNG projects based on the selected geographic scope for these specific impacts.

In addition, the cumulative analysis should reflect design and mitigation aspects that produce significantly lower impacts and minimize the Project's contribution to cumulative impacts, specifically the conclusions regarding: a) air quality, b) wetlands, c) ocelot, and d) cultural resources. CO05-2

[2] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018), pp. 4-268 through 4-270.

CO05 continued, page 2 of 8

CO05-1 The purpose of our cumulative impacts analysis is to evaluate the cumulative impacts of all projects, not to compare impacts between projects or to rank a project's contribution to cumulative impacts relative to other projects. Therefore, we do not agree that it is necessary to rank or further clarify the Annova Project's contribution to cumulative impacts beyond what is presented in the EIS. For comparison purposes, the individual sections of the EISs for the three proposed LNG projects can be reviewed to compare impacts between the individual projects.

CO05-2 See response to comment CO5-1. Also, based on footnote c in Table 4.13.3-1 in this comment, we have revised the final EIS where appropriate to assume the Project would receive up to 125 LNG carriers per year.

Table 4.13.3-1
Illustration of Quantitative Contribution by Annova LNG Brownsville Project

CO05-2 Cont'd

	Project Area	Disturbance Area (Construction) [a]	Disturbance Area (Operation) [a]	Waterbodies Affected/Crossed	Wetlands	Upland Scrub/ Shrub	Employment (Construction)	Employment (Operation)	Vehicle Traffic (Construction)	Vessel Traffic (Construction)	Vessel Traffic (Operation)
	acres	acres	acres	number	Acres	acres	number of jobs	number of jobs	trips per day	vessels per year	vessels per year
Annova LNG	731	491	412	1	58	224	700-1,200	165	2,000 [b]	36	*125* [c]
Total	20,174	2,121	1,231	194	812	1,198	*9,260 - 11,312*	*778*	*16,358* [d]	*745*	*932*
Annova % of Total	*3.6*	*23.1*	*33.5*	*0.5*	*7.1*	*18.7*	*7.7 - 10.1*	*21.2*	*12.2*	*4.8*	*13.4*
Total of 3 LNGs [a]							*4,350 average 7,737 peak*	*545*	*14,408* [d]	*325*	*512*
Annova % of Total (3 LNGs) [a]							*16.0 average 15.5 peak*	*30.3*	*13.9*	*11.1*	*24.4*

Notes:
[a] Based on the DEIS, FERC conducted a quantitative analysis of employment and traffic impacts that was limited to the three Brownsville LNG projects.
[b] This total represents total vehicle trips per day without the use of buses. Based on a 40-passenger bus, vehicle trips will reduce to 50 for construction workers plus 400 support and management staff, or 450 vehicle trips per day, or 5.5% of the potential cumulative impact of the three LNGs.
[c] Annova requests that the FERC analyze the estimated maximum 125 LNG carrier trips per year.
[d] It appears that the summary table should reflect the daily trips from Texas LNG (2,908) and Rio Grande LNG (9,500).

a. Cumulative Impacts on Air Quality

CO05-3

The cumulative impact analysis for air quality should address Annova's contribution to potential cumulative impacts because the Project's use of power from the grid results in minor local air emissions and minimizes air quality impacts. Annova is proposing electric motor-driven equipment to compress LNG using electricity from the grid and minimize local air emissions. Using existing electric generation capacity from the Electric Reliability Council of Texas (ERCOT) system is an efficient use of resources and completely avoids the environmental impacts from constructing new electric generation capacity. The ERCOT grid is essentially a closed system, with available capacity for use in Texas.[3] Annova's design choice to use grid energy for compression will benefit the local area by avoiding air quality impacts from construction and operation of new power generation sources, and it will benefit the ERCOT grid by ensuring a long-term reliable customer. As shown in Table 1, Annova's emissions account for less than 10 percent of the cumulative emissions for all criteria air pollutants except sulfur dioxide.

[3] U.S. Energy Information Administration, "Today in Energy, U.S. electric system is made up of interconnections and balancing authorities," July 20, 2016, Accessed online at: https://www.eia.gov/todayinenergy/detail.php?id=27152.

CO05-3 See response to comment CO5-1.

Table 1
Total Operational Emissions (tons per year)[a]

Pollutant	Annova LNG[b]	Rio Grande LNG[c]	Texas LNG[d]	Total	Annova LNG % of Total
CO	163.8	3,231	328.1	3,722.9	**4.4%**
NOx	187.6	2,987	238.9	3,413.5	**5.5%**
PM_{10}	20.5	410.4	12.7	443.6	**4.6%**
$PM_{2.5}$	20.5	409.6	12.4	442.5	**4.6%**
VOC	60.6	643	27.9	731.5	**8.3%**
SO_2	84	44.1	107.6	235.7	35.6%
GHG as CO_2e	363,643	8,194,766	613,901	9,172,310	**4.0%**
Total HAPs	5.94	59.9	2.6	68.4	**8.7%**

[a] Operational emissions include stationary and mobile (vessel) emissions as reported in each project's DEIS.
[b] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018), p. 4-179.
[c] Rio Grande LNG, *Draft Environmental Impact Statement*, Accession No. 20181012-3019 (Oct. 12, 2018), p. 4-253.
[d] Texas LNG, *Draft Environmental Impact Statement*, Accession No. 20181026-3000 at 4-305 (Oct. 26, 2018), p.4-184.

CO05-3 Cont'd

The DEIS concludes that, "each LNG Terminal could be constructed within the same time period, and the concurrent construction, commissioning, and operations emissions of the proposed Brownsville LNG terminals could contribute significantly, potentially exceed the NAAQS in local areas, and result in cumulatively greater local air quality impacts."[4] Table 4.13.3-3 in the DEIS shows modeled peak concentrations for five criteria air pollutants from each LNG facility compared to the National Ambient Air Quality Standard (NAAQS).[5] Generally, higher emissions contribute proportionately to air quality impacts. Other factors that may influence impacts, and thus this comparison, include differences in stack height, stack gas temperature, and velocity. However, given Annova's contribution to total emissions shown in Table 1, the presentation of peak air quality modeling results shown in the DEIS Table 4.13.3-3 and the conclusion regarding potential to exceed the NAAQS distort the impacts of the Project.

As described in the DEIS, the cumulative analysis combined modeled impacts from each facility using a common receptor grid "based on combining the predicted concentrations from each project at each receptor location regardless of the time when is [*sic*] occurs."[6] This may be a reasonable approach for the annual average concentrations since annual averaging in modeling smooths out the hour-by-hour variability of the wind direction; however, it is overly conservative for short-term periods. Estimating peak cumulative air quality impacts on the 1-hour averaging time would also be dependent on the local wind direction, the time of day at which those impacts occur, and the geographic position of each facility in the cumulative analysis. Timing of modeled impacts at any given receptor location also depends strongly on the local wind direction. It is highly unlikely, if not impossible, for each facility to contribute to the peak cumulative maximum at a specific location at the same time because at that time the local wind direction would be the same at each facility. In reality, one or more facilities' emissions are downwind (or upwind) of the predicted peak cumulative maximum location because the wind direction is the same for all three projects at a given time. The result is that the DEIS does not distinguish the contribution from each facility to FERC's predicted potentially significant impact. For this cumulative

[4] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018), p. 4-303.
[5] *Ibid.* at 4-302.
[6] *Ibid.* at 4-302.

analysis to determine whether a potential exceedance of the 1-hour nitrogen dioxide (NO_2) NAAQS could occur, the analysis should segregate impacts from each facility by wind direction prior to combining. Further, the finding that cumulative impacts of peak impacts could cause an exceedance of the NAAQS is speculative because it sums the peak concentrations using a highly conservative assumption regarding wind direction and without regard to effects of wind dispersion that would affect the potential to exceed the 1-hour NO_2 NAAQS. Annova requests that FERC qualify the conservative nature of the methodology and clarify that the analysis reflects an impact that could not actually occur. CO05-3 Cont'd

In addition, Figure 4.13.2-1 that FERC developed and included in the DEISs for both the Rio Grande and Texas LNG projects illustrates the cumulative modeled impacts for 1-hour NO_2 and the spatial distribution of the peak concentration.[7,8] Annova requests that FERC use this figure to further clarify the Project's potential contribution to this scenario.

b. Cumulative Impacts on Wetlands CO05-4

The DEIS states that "while the proposed LNG Terminal would contribute to cumulative impacts on wetlands, along with other projects in the area, this impact would not be significant."[9] However, we request that the cumulative analysis also acknowledge that the Project would not contribute to cumulative impacts because Annova's proposed mitigation plan would restore and enhance over 250 acres of wetlands at Little San Martin Lake. Annova's proposed compensatory mitigation will more than offset the Project's wetland impacts, which ensures no net loss of wetlands, in accordance with U.S. Army Corps of Engineers and U.S. Environmental Protection Agency regulatory requirements and guidance. Annova requests that FERC clarify that the Project does not contribute to the cumulative impact on wetlands considering these mitigation measures or use the quantitative contribution of 7.1% if the intention is to represent all activities as if the loss actually occurs.

c. Cumulative Impacts on Ocelot CO05-5

The DEIS cumulative analysis states that "past, present, and proposed future development throughout the geographic scope for assessing cumulative impacts on ocelots and jaguarundis, as well as the associated increases in road traffic, light, and noise, we have determined that cumulative impacts on ocelots and jaguarundis would adversely affect these species."[10] In addition, the DEIS identifies that "Vehicle collisions are the leading cause of death of ocelots in Texas."[11] The DEIS notes that the "Laguna Atascosa NWR population is the closest resident subpopulation to the Project area and is located approximately 11 miles north of the Project."[12] However, the DEIS concludes, "increased traffic along

[7] Rio Grande LNG, *Draft Environmental Impact Statement*, Accession No. 20181012-3019 (Oct. 12, 2018), p. 4-445.
[8] Texas LNG, *Draft Environmental Impact Statement*, Accession No. 20181026-3000 at 4-305 (Oct. 26, 2018), p. 4-327.
[9] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018), p. 4-303.
[10] *Ibid.* at 4-285.
[11] *Ibid.* at 4-66.
[12] *Ibid.* at 4-65.

CO05-4 See response to comment CO5-1. In addition, as stated in the EIS, a decision on the acceptability of Annova's draft Conceptual Mitigation Plan is pending review by the COE.

CO05-5 See response to comment CO5-1. In addition, section 4.13.3.7 of the final EIS has been modified to clarify that construction traffic for the Annova LNG Project would primarily use SH4 rather than SH48.

Kimberly D. Bose
February 4, 2019
Page 6

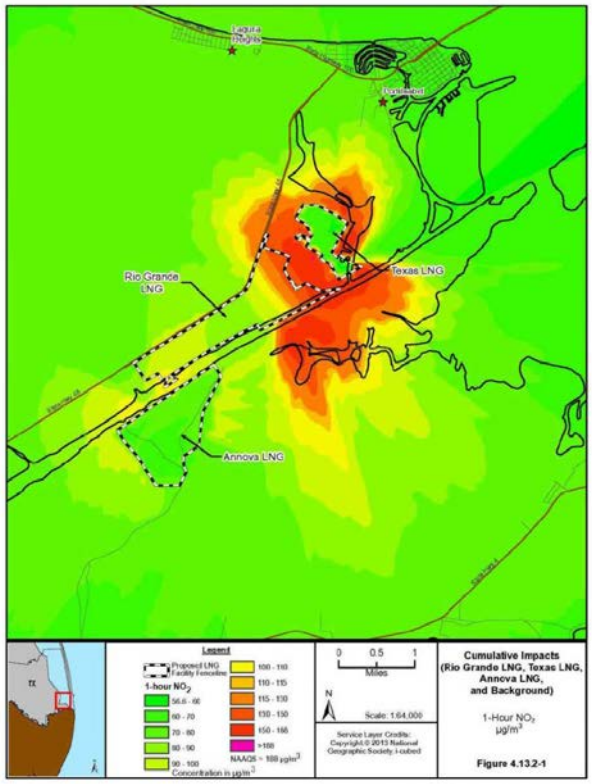

FIGURE 4.13.2-1 Cumulative Impacts (Rio Grande LNG, Texas LNG, Annova LNG, and Background Concentrations), 1-Hour NO_2

CO05-5
Cont'd

State Highway (SH) 48 associated with the proposed Project …could result in increased potential for vehicle strikes on ocelots and jaguarundis."[13] Other projects in the cumulative analysis would significantly contribute to potential vehicle strikes and mortality to ocelot because of their location north of the channel, and associated construction traffic would primarily use SH 48. Annova's contribution to increased traffic represents less than 15 percent of the traffic from the three LNG projects and Annova's contribution would occur primarily on SH 4, not on SH 48. The contribution to potential vehicle strikes on SH 4 assumes an ocelot from the resident population at Laguna Atascosa NWR population approximately 11 miles north of the Project would cross SH 48 and the Brownsville Ship Channel. Furthermore, Annova is minimizing construction traffic on SH 4 by establishing a parking area west of the Fort Brown Check Station and transporting workers to the Project by bus. The use of 40-passenger buses reduces the number of vehicle trips from approximately 2,000 per day to approximately 450 per day, in which case Annova's contribution compared to the cumulative impacts is approximately 3 percent. CO05-5 Cont'd

In addition, Annova also committed to several measures that would minimize the potential effects on ocelots, including: CO05-6

- Preservation of a 185-acre wildlife corridor on the west side of the Project site to maintain habitat connectivity within the South Texas Coastal Corridor;
- Extension of the Redhead Ridge Conservation Easement (located on the west side of the Rio Grande LNG Project site) beyond the current 2023 expiration date to maintain habitat connectivity within the South Texas Coastal Corridor;
- Conservation of off-site lands that will provide protection of ocelot and jaguarundi habitat;
- Minimizing light emitted from the Project into the western wildlife corridor by using shielded, down-facing lights to the extent practicable; and
- Minimizing noise in the western wildlife corridor by constructing a concrete barrier between the terminal site and the corridor.

Therefore, Annova requests that FERC clarify that the Project's contribution to cumulative impacts from vehicle strikes would be minor given these mitigation measures and its contribution to cumulative vehicle traffic.

d. Cumulative Impacts on Cultural Resources CO05-7

Annova requests that the DEIS clarify the Project's contribution to potential cumulative impacts at Palo Alto Battlefield National Historical Landmark (NHL). The DEIS states "the Project would result in a low potential impact on the view from KOP 10" referring to the Palo Alto Battlefield NHL.[14] The DEIS states the Project "would not affect the essential features of the Palo Alto Battlefield for the period of significance (the Mexican War) and its overall integrity would remain intact."[15] However, with respect to cumulative impacts, the DEIS states that the "overall visual impact on the Palmito Ranch Battlefield NHL and the Palo Alto Battlefield NHL KOPs would range from no effect or negligible in some areas to moderate or moderately high in other areas, due to varying degrees of distance, partial screening, and foreground vegetation."[16] Because the Project would result in a low potential impact on Palo Alto Battlefield NHL and would not affect the essential features, we request that FERC use the same context to describe the Project's negligible contribution to potential cumulative impacts. The Project's negligible contribution to potential cumulative impacts is further demonstrated by the fact that Rio Grande LNG

[13] *Ibid.* at 4-284.
[14] Annova LNG, *Draft Environmental Impact Statement*, Accession No. 20181214-3018 (Dec. 14, 2018), p. 4-118.
[15] *Ibid.* at 4-154.
[16] *Ibid.* at 4-292.

CO05 continued, page 7 of 8

CO05-6 See response to comment CO5-1.

CO05-7 See response to comment CO5-1.

would appear in the space between the Palo Alto Battlefield NHL and the Annova LNG Brownsville Project, partially obstructing the view of the Project from Palo Alto Battlefield NHL. Therefore, because of the Project's distance and location relative to Palo Alto Battlefield NHL and Rio Grande LNG, it would not contribute significantly to cumulative impacts. CO05-7 Cont'd

Respectfully submitted,

/s/ Susan B. Bergles

Counsel to Annova LNG Common Infrastructure, LLC; Annova LNG Brownsville A, LLC; Annova LNG Brownsville B, LLC; and Annova LNG Brownsville C, LLC

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CO06 Friends of the Wildlife Corridor, page 1 of 4

Friends of the Wildlife Corridor

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February 4, 2019

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

Comments on Draft Environmental Impact Statement
Annova LNG CP16-480-000

Dear Secretary Bose,

These comments are on behalf of the Friends of the Wildlife Corridor, a non-profit 501c(3) conservation organization whose mission is to support Santa Ana and Lower Rio Grande Valley National Wildlife Refuges, and is committed to the protection and preservation of native and migratory wildlife and the habitat they depend on. The proposed project would have a significant impact on habitat and wildlife. CO06-1

The Draft EIS is incomplete. There is a list of important information that FERC is requesting that Annova provide "before the end of the comment period." How can the public evaluate and respond to missing information? How will the public know the required information is submitted, and how will they be able to evaluate and respond? The comment period should be extended for 2 weeks after the missing information is provided. This 2 week extension is also warranted because of the partial government shutdown, which prevented most cooperating agencies from reviewing, commenting or providing information either to the public or to FERC. CO06-2 The DEIS is also incomplete due to its non-availability in Spanish, which is widely spoken in the Project area. CO06-3

Annova's mitigation is grossly inadequate. There is no mitigation plan at all for the large loma (Loma de Potrero Cercado) that would be 2/3 destroyed in order to build the LNG facility. Lomas are unique geologic and biological formations of great habitat and wildlife value. They are thousands of years in the making and intact lomas number fewer than twelve. Annova repeatedly dismisses or minimizes their value and offers no mitigation. Their statements (p.ES-5) "…we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project (p.4-32 are false statements, as is the statement (p.4-48) "…we conclude that impacts on terrestrial wildlife and wildlife habitat would be minor." Loma Potrero Cercado, the largest of the lomas, is in fact thickly forested and is the only loma that contains freshwater wetlands within it. Annova's vegetation survey of the Project site was inadequate and should be CO06-4

www.friendsofthewildlifecorridor.org

CO06-1 Thank you for your comment.

CO06-2 We disagree that all plans and information must be available during preparation of the draft EIS. Information filed by Annova during the draft EIS comment period is available to the public for review after filing with FERC. On February 7, 2019 FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

CO06-3 We disagree that the draft EIS was incomplete because of its non-availability in Spanish. Executive Order No. 12898, which informs the federal government's approach to issues of environmental justice, provides that "Each Federal agency may, whenever practicable and appropriate, translate crucial public documents, notices, and hearings relating to human health or the environment for limited English-speaking populations." However, Executive Order No. 12898 applies to the agencies specified in section 1-102 of that Order, and the Commission is not one of the specified agencies. Consequently, even if translation were required under Executive Order No. 12898, the provisions of the Order are not binding on the Commission. However, it is current Commission practice to address environmental justice in its NEPA document when raised. Therefore, we have included this discussion in the final EIS in section 4.9.9. Further, in an effort to include Spanish language speakers in the NEPA process, Spanish language Project materials were made available to the public during the scoping meeting and public comment meeting held in Port Isabel and described in section 1.3.1 of the FEIS. In addition, a translator was available to assist Spanish language speakers. During the public scoping meeting, very few of the Spanish language materials that were made available were utilized by attendees. As such, we determined that translation of the draft EIS into Spanish was not necessary.

CO06-4 As noted in the draft EIS, the EIS was prepared by FERC staff, and statements and conclusions in the EIS represent the FERC's analysis unless specifically attributed to Annova. Impacts on lomas, including Loma Potrero Cercado, and the related impacts on wildlife, are described in various sections of the EIS. The final EIS has been revised to remove the statement that no forest vegetation would be impacted. While lomas within the Project site contain some scattered trees, the habitat is classified as scrub (following the Ecological Mapping System of Texas) or thornscrub. However, the National Land Cover Database (NLCD) does classify a portion of the site as forested land use. Section 4.5.1 of the final EIS has been revised to clarify.

redone by a natural resource agency not invested in its destruction. The DEIS states there are no species present from the Annotated County List of Rare Species (TPWD) which is not true. Also false is the statement that the Ebony Snake eyes vegetation does not exist on the site. And that Annova did not recognize that the loma's two wetlands are freshwater, not saltwater, casts more doubt on their survey's thoroughness and credibility. CO06-5 CO06-6

Annova's proposed wetlands mitigation, though more under the jurisdiction of the USACE, is unacceptable. As described in the Conceptual Mitigation Plan it is misleading, unneeded, already protected, and incommensurate with the wetland losses the Project would entail. It furthermore would violate the national "no net loss" policy. CO06-7

At least 18 wildlife species that are federally listed as threatened, endangered or proposed for listing will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Pursuant to the Endangered Species Act consultation, the FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy if the Project is permitted and built. Between 95% and 98% of the native habitat in the Rio Grande Valley has been cleared for urban, agricultural or industrial use. The location of the Annova project will further diminish and fragment our remaining habitat and will impact wildlife migration and connectivity between Laguna Atascosa and Lower Rio Grande National Wildlife Refuges. On page 4-96 the DEIS states "All the lands identified for acquisition as part of the BGCC [Bahia Grande Coastal CorridorProject] are located along the eastern end of SH 4, north of the Annova Project site…" This statement is false. The map on page 13 of the Bahia Grande Coastal Corridor Project document (November 2014) shows the corridor extending south of the BSC and including the Annova site. The Annova site is a vital piece of the Corridor, and for this reason is the worst of the three proposed LNG projects. CO06-8 CO06-9

Annova's consultation with FWS with regards to the Migratory Bird Conservation Plan and the Endangered Species Act should be finalized, and should include the Project's proposed 9 mile high-voltage powerline south of the Ship Channel, as well as consultations with National Marine Fisheries Service. All should be included in the EIS for public review and comment. Requiring this information only "before construction" (hence after permitting) is not acceptable as it excludes the public from meaningful review. Regarding migratory as well as nesting bird impacts, the DEIS says "Annova would attempt to limit clearing on the Project site to between September 1 through February 28 to avoid impacts…" "Would attempt" is very weak and unenforceable language and should be changed to "is required." In reality, clearing and grading will be an enormous impact whenever they are done. CO06-10 CO06-11

The western portion of Loma Potrero Cercado that Annova proposes to leave as a corridor will be heavily impacted by noise, lights, traffic, fences, and the 20 feet-wide security road outside the primary security fence. It's ability to function as a wildlife corridor, particularly for CO06-12

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CO06 continued, page 2 of 4

CO06-5 We do not agree that Annova's vegetation survey needs to be redone to support preparation of the EIS. However, another agency may conduct a vegetation survey of the site, or require Annova to complete another survey, if deemed appropriate by that agency. We are not aware of evidence that specific vegetation types exist on the site that were not identified in Annova's vegetation survey.

CO06-6 Annova initially classified some wetlands within the site as freshwater, as shown in initial wetland survey reports filed with FERC. However, based on consultation with the COE and further evaluation of vegetation and soil characteristics, Annova revised the classification to be estuarine. See further explanation in Annova's March 25, 2019, filing in response to our EIR (FERC accession number 20190325-5179.

CO06-7 The draft conceptual mitigation plan is under the jurisdiction of the COE. The COE would determine the adequacy of the plan. According to Annova, the COE has stated that the final acreages would be determined based on the final mitigation needs and work plan, which would be completed through COE coordination and permit review, and subsequent development of engineering plans.

CO06-8 It is not necessary that the FWS Biological Opinion precede the Commission's permitting decision. See also response to comment CO4-8.

CO06-9 Potential impacts on wildlife habitat, including from segmenting habitat within the wildlife corridor between the Laguna Atascosa and Lower Rio Grande Valley NWRs, is evaluated in the EIS. See also response to comment CO4-8. The referenced statement regarding lands identified for acquisition matches the features shown as "USFWS Refuge Acquisition Boundary" on the November 2014 Bahia Grande Coastal Corridor Project map. Section 4.8.4.2 of the final EIS has been revised to clarify this statement.

CO06-10 It is typical that consultations with the FWS and NMFS as required for compliance with Endangered Species Act and the Migratory Bird Treaty Act may not be completed prior to issuance of the EIS, or prior to Project authorization. However, in such a case project authorization would be conditioned on the successful completion of the required consultations and any related mitigation plans. We will evaluate any outstanding plans when they are filed with the FERC, and the public will also have the opportunity to review and comment at that time.

CO06-11 We acknowledge that Annova's proposed measure using the modifier "attempt" does not guarantee the measure would be implemented. However, our evaluation of potential impacts takes this into consideration. In addition, as stated in section 4.6.1.2 of the EIS, in the event that clearing could not be accomplished during the stated time window, Annova proposes to implement additional measures, as recommended by the FWS, designed to avoid or minimize impacts on nesting birds, which would be acceptable.

ocelots and other nocturnal species, is unlikely. Wildlife will have no other north-south corridor, as immediately adjacent lands are barren dredge disposal areas. Another mitigation deficiency: in return for agreeing to move the Project site slightly eastward, the USFWS agreed to surrender over 100 acres of Loma Ecological Preserve land. To essentially "take" protected wildlife habitat without appropriate mitigation is unacceptable. CO06-12 Cont'd

The DEIS states that wetlands, the BSC & mudflats at the terminal site are essential fish habitat. Yet no study has been done of the fish, shellfish and benthic resources in the channel at the Project site. This should be required of the applicant. Using "comparative" data from Calcasieu, Louisiana (500 miles from the Project site) is absurd. Without baseline local data how can you assess the impacts of the extensive excavation, dredging, pile-driving, and operation of the Project? Potential dredging impacts to South Bay need to be examined, particularly since the DEIS states "Cumulative impacts on surface water quality during operation would be permanent and moderate to significant." South Bay, named the first Texas Coastal Preserve by the General Land Office in 1986, is extremely shallow, clear and productive. Sea grasses and oyster beds can be affected by even mild dredge spoil deposition. Wave and wake impacts on South Bay from increased tanker traffic need to be examined as well. CO06-13

The DEIS states (p.ES-5) "Sediment-laden water could be transported into the Bahia Grande and result in a potential for some increased turbidity and sedimentation effects near the channel entrance…" Annova must ensure this does not happen, as the Bahia Grande was the largest wetland restoration in North America when it was reflooded in 2005. The DEIS says that the Bahia Grande was itself a mitigation site. This is false. CO06-14

The DEIS states that neither construction nor operation would be expected to significantly impact tourism. There is no data to support this statement. Nature tourism is a half a billion dollar industry in the Rio Grande Valley. Port Isabel, South Padre Island, Palmetto Hill Battlefield and Laguna Atascosa NWR are all very tourist-dependent. Interview-type studies need to be done by the applicant with out-of-town tourists to properly assess the potential impact of LNG terminals. Petrochemical industrialization drives away nature tourism. CO06-15

Even after stating that the visual impact of the Project along Hwy 48 near the Bahia Grande Channel (a popular fishing and birding site) would be "moderately high" the DEIS then states that "Project construction would not result in significant impacts on current land use, visual resources, and recreation." We strongly disagree. CO06-16

If Annova were built it would be one of the largest single stationary sources of nitrogen oxides, carbon monoxide, VOC's sulfur dioxide, particulate matter and greenhouse gases in the Rio Grande Valley. It would emit 636,643 tons of GHG and 6 tons of hazardous air pollutants, and this would continue for 25 years or longer. As there is a clear scientific consensus that we must drastically reduce carbon emissions long before then, FERC should require carbon capture at all LNG facilities, including Annova, or deny the permit. CO06-17

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CO06-12 The loss of loma habitat, the Project's location relative to remaining habitat, and the potential effectiveness of the proposed wildlife corridor along the west side of the Project site, were all considered as part of our evaluation of potential impact on the ocelot.

CO06-13 Our evaluation of impact on Essential Fish Habitat (EFH), including from loss of habitat, and from increased turbidity, was included in the EFH Assessment in appendix F of the EIS. Our general conclusion is potential impacts resulting from Project construction and operation are expected to be short-term and highly localized, occurring primarily during construction or shortly thereafter. On February 5, 2019, the National Marine Fisheries Service filed comments with the FERC agreeing with the conclusions in the EFH Assessment (see FERC accession number 20190206-5004.

CO06-14 Section 4.3.2.2 of the EIS describes the potential impact on the Bahia Grande from sedimentation from Project dredging. The Final EIS has been revised to refer to the Bahia Grande restoration project rather than mitigation project.

CO06-15 Impacts on the Lower Rio Grande Valley, South Padre Island, Palmetto Hill Battlefield, and Laguna Atascosa NWR are discussed in section 4.8.4.2 of the EIS. Construction and operation of the Project would result in site-specific impacts on recreation and visitor use during construction and operation, as discussed. These site-specific impacts are not expected to affect overall regional tourism patterns, but could result in localized impacts, with visitors and other recreationists seeking similar opportunities nearby or elsewhere in the region.

CO06-16 Thank you for your comment.

CO06-17 As stated in the EIS and shown in table 4.11.1-4 (in section 4.11.1.4), the stationary sources associated with the Project would have operating emissions that are less than the PSD major source thresholds for all (non-GHG) pollutants. Although potential emissions of GHG are above the PSD significant emission threshold, the requirements of PSD are not triggered if GHG is the only pollutant above this threshold. However, the Project would be subject to the Title V program because the stationary source emissions would exceed the major source thresholds for CO and GHGs. Therefore, Annova would need to apply for and obtain a Title V operating permit. The applicable air permits are the appropriate mechanism for determining mitigation, if necessary. See also new section 3.6.2 of the final EIS.

With respect to noise, the impact hammering of 7,817 concrete pilings 77 feet into the ground for up to 176 days (p, 2-14) would be a significant disturbance to wildlife and is not adequately addressed in the DEIS. CO06-18

Regarding cumulative impacts of all 3 proposed LNG terminals the Annova DEIS says (p, ES-10) "Cumulative impacts have the potential to be more substantial for water resources, protected wildlife, visual resources, noise, and transportation…" It goes on to say (p. ES-11) "Due to the proximity of the Rio Grande LNG and Texas LNG Projects to the same visual receptors as the Annova Project, we conclude that significant cumulative impacts on visual resources are anticipated." Also that the 3 LNG projects cumulatively "would contribute significantly to air quality impacts potentially exceed the NAAQS in local areas, and result in cumulatively greater air quality impacts." These conclusions make a strong case for denial of the permit. The Rio Grande LNG DEIS states that Rio Grande combined with the other projects in the geographic scope, including the Texas LNG and Annova LNG projects, would result in "significant cumulative impacts." Thus if FERC chooses to permit any of the 3 projects (which we strongly oppose), it should deny the other 2, for by its own analysis the cumulative impacts would be too great, i.e. significant. CO06-19

Another reason for permit denial is the non-demonstration of a need for this project. Despite at least one "open season" there are no committed buyers, no binding contracts for the product, LNG. CO06-20

In summary, the Friends of the Wildlife Corridor urges FERC to deny this permit. The DEIS has numerous errors, is either wholly lacking in mitigation (Loma Potrero Cercado, Loma Ecological Preserve, pipeline, parking & staging areas, access road), or in the case of wetlands mitigation is inadequate to the point of being a sham. CO06-21

Impacts to endangered species, air quality, quietude, night sky and the visual landscape are too great and too significant for this project to move forward. CO06-22

Sincerely,

Jim Chapman, Vice President

Note: The Bahia Grande Coastal Corridor Plan and loma images will be submitted separately.

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CO06-18 We address impact on wildlife from construction noise, in particular pile driving, in several sections of the EIS. See sections 4.6.1.1, 4.6.1.2, 4.11.2.3 and 4.11.2.4 as well as response to comment FA04-34. We disagree the analysis is inadequate.

CO06-19 A determination that an impact would be significant is not a determination that the impact would be "too great". The Commission will take into account the environmental conclusions made in the EISs for the three LNG projects when considering whether or not to authorize the projects.

CO06-20 See response to comment CO04-7.

CO06-21 See responses to individual comments on these topics above.

CO06-22 The Commission will take into account the potential impacts on these resources when considering whether or not to authorize the Annova Project.

February 4, 2019

To: FERC

Subject: Comments on Failure to Monetize Greenhouse Gas Emissions in the Environmental Impact Statement for the Annova LNG Brownsville Project

Submitted by: Institute for Policy Integrity and Union of Concerned Scientists[1]

These comments address the failure of the Federal Energy Regulatory Commission's environmental assessment of the Annova LNG Brownsville Project to provide a meaningful analysis of the project's climate effects, as required by the National Environmental Policy Act. CO07-1

FERC quantifies 363,000 tons per year of direct operational emissions of carbon dioxide-equivalent pollution from the project's stationary and mobile sources,[2] 163,000 tons total from the project's construction,[3] and between 1.3 and 1.8 million tons per year needed to power the project.[4] Yet FERC fails to provide any meaningful analysis of the actual, real-world climate impacts associated with those emissions. Had FERC applied the social cost of greenhouse gas metrics to monetize the climate damages of those emissions, decisionmakers and the public would have been informed that the project's direct carbon emissions will cause hundreds of millions of dollars per year in property damage, lost productivity, premature death, and other quantifiable effects.[5] Notably, FERC also does not quantify or monetize the significance downstream emissions that will result upon the combustion of 6.95 million metric tons per year of additional LNG.[6] CO07-2

FERC does not explain its failure to use the social cost of greenhouse gas metrics, though the Commission does generally argue that there is no methodology to determine the physical impacts of greenhouse gas emissions or to assess the significance of a project's greenhouse gas emissions.[7] FERC is mistaken, as the social cost of greenhouse gas methodology is precisely such a tool to appropriately measure the significance of a project's emissions. CO07-3

I. FERC Should Monetize the Social Cost of Greenhouse Gases in its EIS

The National Environmental Policy Act (NEPA), the statute under which environmental impact statements are required, directs agencies to fully and accurately analyze the environmental, public health, and social welfare differences between proposed alternatives, and to contextualize that

[1] Our organizations may separately and independently submit other comments on other issues raised by the EA.

[2] FERC, *Annova LNG Bronwsville Project Draft Environmental Impact Statement* 4-174 to 4-175 (2019) [hereinafter DEIS] (quantifying 353,072 annual tons from onshore stationary sources and 10,571 tons from mobile sources). These comments do not necessarily endorse these figures as complete or accurate calculations of the project's direct emissions.

[3] *Id.* at 4-170.

[4] *Id.* at 3-19 to 3-20 (describing emissions from various power alternatives, including grid electricity, on-site generators, or compressors).

[5] The central estimate for the social cost of carbon for year 2020 emissions is $42 in 2007$. Interagency Working Group on the Social Cost of Greenhouse Gases, *Technical Update of the Social Cost of Carbon* 4 (2016). Using the CPI inflation calculator, $42 in 2007$ was worth about $52 in 2018$. (1.3 million tons CO_2**e + 363,000 tons) * $52/ton = $86.32 million in climate** damages for year 2020 emissions, assuming a conservative alternative for emissions from power generation. A full analysis of climate damages would account for the facts that the social cost of carbon rises over time, but also that future costs and benefits should be discounted to present value.

[6] DEIS at ES-1; see *id.* at 4-306 (mentioning but not quantifying downstream emissions).

[7] *Id.* at 4-306.

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CO07-1 Thank you for your comments. See responses to individual comments below.

CO07-2 It is beyond the scope of the EIS to attempt to monetize the social cost of greenhouse gas emissions. See also response to the following comment CO7-3.

CO07-3 Regarding the Social Cost of Carbon (SCC) tool, as well as the Social Cost of Methane and Nitrous Oxide tools, estimates the monetized climate change damage associated with an incremental increase in carbon dioxide (CO2) emissions in the given year. It estimates the cost today of future climate change damage, represented by a series of annual costs per metric ton of emissions discounted to present-day value. We recognize the availability of the SCC tool, but conclude that it is not appropriate for use in project analyses for the following reasons: The SCC is not meaningful in our NEPA analysis for project decisions under the Natural Gas Act (NGA). The Commission has determined that the SCC tool is more appropriately used in NEPA analyses by regulators whose responsibilities are tied more directly to fossil fuel production or consumption. The Commission's authority under Section 7 of the NGA has no direct connection to the production or end use of natural gas. The Commission does not control the production or consumption of natural gas. Producers, consumers, and their intermediaries respond freely to market signals about location-specific supply and location-specific demand. The Commission oversees proposals to transport natural gas between those locations. Our NEPA analysis considers all construction emissions and annual operational GHG emissions that are causally related to the proposed action that is before the Commission.

information for decision-makers and the public. NEPA requires a more searching analysis than merely disclosing the amount of pollution. Rather, FERC must examine the "ecological[,]... economic, [and] social" impacts of those emissions, including an assessment of their "significance."[8] By failing to use available tools, such as the social cost of carbon, to analyze the significance of emissions, FERC violated NEPA. CO07-3 Cont'd

Monetizing Climate Damages Fulfills the Obligations and Goals of NEPA and the NGA CO07-4

When a project has climate consequences that must be assessed under NEPA, monetizing the climate damages fulfills an agency's legal obligations under NEPA in ways that simple quantification of tons of greenhouse gas emissions cannot. NEPA requires "hard look" consideration of beneficial and adverse effects of each alternative for major federal government actions. The U.S. Supreme Court has called the disclosure of impacts the "key requirement of NEPA," and held that agencies must "consider and disclose the *actual environmental effects*" of a proposed project in a way that "brings those effects to bear on [the agency's] decisions."[9] Courts have repeatedly concluded that an environmental impact statement must disclose relevant climate effects.[10] NEPA requires "a reasonably thorough discussion of the significant aspects of the probable environmental consequences," to "foster both informed decisionmaking and informed public participation."[11] In particular, "[t]he impact of greenhouse gas emissions on climate change is precisely the kind of cumulative impact analysis that NEPA requires," and it is arbitrary to fail to "provide the necessary contextual information about the cumulative and incremental environmental impacts."[12] Furthermore, the analyses included in environmental assessments and impact statements "cannot be misleading."[13] An agency must provide sufficient informational context to ensure that decisionmakers and the public will not misunderstand or overlook the magnitude of a proposed action's climate risks compared to the no action alternative. As this section explains, by only quantifying the volume of greenhouse gas emissions, agencies fail to assess and disclose the actual climate consequences of an action and misleadingly present information in ways that will cause decisionmakers and the public to overlook important climate consequences. Using the social cost of greenhouse gas metrics to monetize climate damages fulfills NEPA's legal obligations in ways that quantification alone cannot.

Similarly, monetizing climate damages advances the NGA's goals of reasoned decisionmaking. To assess whether a project is "required by present or future public convenience and necessity,"[14] FERC must

[8] 40 C.F.R. §§ 1508.8(b), 1502.16(a)-(b).

[9] *Baltimore Gas & Elec. Co. v. Natural Res. Def. Council*, 462 U.S. 87, 96 (1983) (emphasis added); *see also* 40 C.F.R. § 1508.8(b) (requiring assessment of the "ecological," "economic," "social," and "health" "*effects*") (emphasis added).

[10] As the Ninth Circuit has held: "[T]he fact that climate change is largely a global phenomenon that includes actions that are outside of [the agency's] control . . . does not release the agency from the duty of assessing the effects of *its* actions on global warming within the context of other actions that also affect global warming." *Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1217 (9th Cir. 2008); *see also Border Power Plant Working Grp. v. U.S. Dep't of Energy*, 260 F. Supp. 2d 997, 1028-29 (S.D. Cal. 2003) (failure to disclose project's indirect carbon dioxide emissions violates NEPA).

[11] *Ctr. for Biological Diversity*, 538 F.3d at 1194 (citations omitted).

[12] *Id.* at 1217.

[13] *High Country Conservation Advocates v. U.S. Forest Service*, 52 F. Supp. 3d 1174, 1182 (D. Colo. 2014); *accord. Johnston v. Davis*, 698 F.2d 1088, 1094-95 (10th Cir. 1983) (disapproving of "misleading" statements resulting in "an unreasonable comparison of alternatives"); *Hughes River Watershed Conservancy v. Glickman*, 81 F.3d 437, 446 (4th Cir. 1996) ("For an EIS to serve these functions" of taking a hard look and allowing the public to play a role in decisionmaking, "it is essential that the EIS not be based on misleading economic assumptions"); *see also Sierra Club v. Sigler*, 695 F.2d 957, 979 (5th Cir. 1983) (holding that an agency's "skewed cost-benefit analysis" was "deficient under NEPA"); *see generally Bus. Roundtable v. SEC*, 647 F.3d 1144, 1148-49 (D.C. Cir. 2011) (criticizing an agency for "inconsistently and opportunistically fram[ing] the costs and benefits of the rule" and for "fail[ing] adequately to quantify the certain costs or toe explain why those costs could not be quantified").

[14] 15 U.S.C. § 717f(e).

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CO07-4 See response to comment CO7-3.

"evaluate *all factors* bearing on the public interest."[15] Relevant factors include any "adverse effects" to "general societal interests," and specifically include "environmental impacts" beyond just those experienced by landowners and the surrounding community, extending to cover the range of "other environmental issues considered under the National Environmental Policy Act."[16] When FERC "articulate[s] the critical facts upon which it relies" to review public convenience and necessity, "[a] passing reference to relevant factors . . . is not sufficient to satisfy the Commission's obligation to carry out 'reasoned' and 'principled' decisionmaking. [Courts] have repeatedly required the Commission to 'fully articulate the basis for its decision.'"[17] Consequently, when FERC weighs a project's climate consequences directly into its review of public convenience and necessity, monetization using the social cost of greenhouse gas metrics achieves the goal of fully articulating a relevant factor, while quantification alone would obscure important details. CO07-4 Cont'd

FERC Must Assess Actual Incremental Climate Impacts, Not Just the Volume of Emissions CO07-5

The tons of greenhouse gases emitted by a project are not the "actual environmental effects" under NEPA, nor are they the relevant "factors bearing on the public interest" under the NGA. Rather, the actual effects and relevant factors are the incremental climate impacts caused by those emissions, including:[18]

- property lost or damaged by sea-level rise, coastal storms, flooding, and other extreme weather events, as well as the cost of protecting vulnerable property and the cost of resettlement following property losses;
- changes in energy demand, from temperature-related changes to the demand for cooling and heating;
- lost productivity and other impacts to agriculture, forestry, and fisheries, due to alterations in temperature, precipitation, CO_2 fertilization, and other climate effects;
- human health impacts, including cardiovascular and respiratory mortality from heat-related illnesses, changing disease vectors like malaria and dengue fever, increased diarrhea, and changes in associated pollution;
- changes in fresh water availability;
- ecosystem service impacts;

[15] *Missouri Public Serv. Comm'n v. FERC*, 234 F. 3d 36, 38 (D.C. Cir. 2000) (quoting *Atlantic Ref. Co. v. Public Serv. Comm'n*, 360 U.S. 378, 391 (1959)) (emphasis added).

[16] 88 FERC ¶ 61,227, Statement of Policy at pp.23-24 (Sept. 15, 1999). *See, e.g.*, *Minisink Residents for Envtl. Pres. v. FERC*, 762 F.3d 97, 101 (D.C. Cir. 2014) ("listing "conservation" and "environmental . . . issues" as the NGA's "subsidiary purposes").

[17] *Missouri Public Serv. Comm'n*, 234 F.3d at 40, 41 (citations omitted).

[18] These impacts are all included to some degree in the three integrated assessment models (IAMs) used by the IWG (namely, the DICE, FUND, and PAGE models), though some impacts are modeled incompletely, and many other important damage categories are currently omitted from these IAMs. *Compare* Interagency Working Group on the Social Cost of Carbon, *Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis* at 6-8, 29-33 (2010), https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf [hereinafter 2010 TSD]; *with* Peter Howard, *Omitted Damages: What's Missing from the Social Cost of Carbon* (Cost of Carbon Project Report, 2014), http://costofcarbon.org/files/Omitted_Damages_Whats_Missing_From_the_Social_Cost_of_Carbon.pdf. For other lists of actual climate effects, including air quality mortality, extreme temperature mortality, lost labor productivity, harmful algal blooms, spread of west nile virus, damage to roads and other infrastructure, effects on urban drainage, damage to coastal property, electricity demand and supply effects, water supply and quality effects, inland flooding, lost winter recreation, effects on agriculture and fish, lost ecosystem services from coral reefs, and wildfires, see EPA, *Multi-Model Framework for Quantitative Sectoral Impacts Analysis: A Technical Report for the Fourth National Climate Assessment* (2017); U.S. Global Change Research Program, *Climate Science Special Report: Fourth National Climate Assessment* (2017); EPA, *Climate Change in the United States: Benefits of Global Action* (2015); Union of Concerned Scientists, *Underwater: Rising Seas, Chronic Floods, and the Implications for U.S. Coastal Real Estate* (2018).

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CO07-5 See response to comment CO7-3.

- impacts to outdoor recreation and other non-market amenities; and
- catastrophic impacts, including potentially rapid sea-level rise, damages at very high temperatures, or unknown events.

CO07-5 cont'd

Even in combination with a general, qualitative discussion of climate change, by calculating only the tons of greenhouse gases emitted or a percentage comparison to sectoral, regional, or national emissions, an agency fails to meaningfully assess the actual incremental impacts to property, human health, productivity, and so forth.[19] An agency therefore falls short of its legal obligations and statutory objectives by focusing just on volume estimates. Similarly, courts have held that merely quantifying the acres of timber to be harvested or the miles of road to be constructed does not constitute a "description of *actual* environmental effects," even when paired with a qualitative "list of environmental concerns such as air quality, water quality, and endangered species," when the agency fails to assess "the degree that each factor will be impacted."[20]

CO07-6

By monetizing climate damages using the social cost of greenhouse gas metrics, FERC can satisfy NEPA's mandate to analyze and disclose to the public the actual effects of emissions and their significance. The social cost of greenhouse gas methodology calculates how the emission of an additional unit of greenhouse gases affects atmospheric greenhouse concentrations, how that change in atmospheric concentrations changes temperature, and how that change in temperature incrementally contributes to the above list of economic damages, including property damages, energy demand effects, lost agricultural productivity, human mortality and morbidity, lost ecosystem services and non-market amenities, and so forth.[21] FERC is incorrect in asserting that "there is no scientifically-accepted methodology available to correlate specific amounts of GHG emissions to discrete changes in average temperature rise, annual precipitation fluctuations, surface water temperature changes, or other physical effects on the global environment."[22] The social cost of greenhouse gas tool in fact does allow agencies to consider the actual effects of emissions and their significance in ways that merely providing a quantitative estimate of the volume of emissions cannot.

CO07-7

Climate Damages Depend on Stock and Flow, But Volume Estimates Only Measure Flow

The climate damage generated by each additional ton of greenhouse gas emissions depends on the background concentration of greenhouse gases in the global atmosphere. Once emitted, greenhouse gases can linger in the atmosphere for centuries, building up the concentration of radiative-forcing

[19] *See High Country*, 52 F. Supp. 3d at 1190 ("Beyond quantifying the amount of emissions relative to state and national emissions and giving general discussion to the impacts of global climate change, [the agencies] did not discuss the impacts caused by these emissions."); *Mont. Envtl. Info. Ctr. v. U.S. Office of Surface Mining*, 274 F. Supp. 3d 1074, 1096–99 (D. Mont. 2017) (rejecting the argument that the agency "reasonably considered the impact of greenhouse gas emissions by quantifying the emissions which would be released if the [coal] mine expansion is approved, and comparing that amount to the net emissions of the United States").

[20] *Klamath-Siskiyou Wildlands Ctr. v. Bureau of Land Mgmt.*, 387 F.3d 989, 995 (9th Cir. 2004) ("A calculation of the total number of acres to be harvested in the watershed is . . . not a sufficient description of the actual environmental effects that can be expected from logging those acres."); *see also Oregon Natural Res. Council v. Bureau of Land Mgmt.*, 470 F.3d 818 (9th Cir. 2006). *See also NRDC v. U.S. Nuclear Reg. Comm'n*, 685 F.2d 459, 487 (D.C. Cir. 1982) (ruling that merely listing "the quantity of . . . heat, chemicals, and radioactivity released" is insufficient under NEPA if the agency "does not reveal the meaning of those impacts in terms of human health or other environmental values"), *rev'd sub nom. on other grounds Baltimore Gas & Elec. Co.*, 462 U.S. at 106-07 ("agree[ing] with the Court of Appeals that NEPA requires an EIS to disclose the significant health, socioeconomic, and cumulative consequences of the environmental impact of a proposed action," but finding that the specific "consequences of effluent releases" could be assessed at a subsequent stage in the particular proceeding under review).

[21] 2010 TSD, *supra* note 18, at 5.

[22] EA at 172.

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CO07-6 See response to comment CO7-3.

CO07-7 See response to comment CO7-3.

pollution and affecting the climate in cumulative, non-linear ways.[23] As physical and economic systems become increasingly stressed by climate change, each marginal additional ton of emissions has a greater, non-linear impact. The climate damages generated by a given amount of greenhouse pollution is therefore a function not just of the pollution's total volume but also the year of emission, and with every passing year an additional ton of emissions inflicts greater damage.[24] CO07-7 Cont'd

As a result, focusing just on the volume or rate of emissions is insufficient to reveal the incremental effect on the climate. The change in the rate of emissions (flow) must be assessed given the background concentration of emissions (stock). A percent comparison to national emissions is perhaps even more misleading. For example, a project that adds 23 million additional tons per year of carbon dioxide would have contributed to 0.43% of total U.S. carbon dioxide emissions in the year 2012.[25] In the year 2014, that same project with the same carbon pollution would have contributed to just 0.41% of total U.S. carbon dioxide emissions—a seemingly smaller relative effect, since the total amount of U.S. emissions increased from 2012 to 2014.[26] However, because of rising background concentrations of global greenhouse gas stock, and because of growing stresses in physical and economic systems, the marginal climate damages per ton of carbon dioxide (as measured by the social cost of carbon) increased from $33 in 2012 to $35 in 2014 (in 2007$).[27] Consequently, those 23 million additional tons would have caused marginal climate damages costing $759 million in the year 2012, but by 2014 that same 23 million tons would have caused $805 million in climate damages. To summarize: the percent comparison to national emissions misleadingly implied that a project adding 23 million more tons of carbon dioxide would have a relatively less significant effect in 2014 than in 2012, whereas monetizing climate damages using the social cost of greenhouse gases would accurately reveal that the emissions in 2014 were much more damaging than the emissions in 2012—almost $50 million more. This example illustrates why only providing a percentage comparison against national or global greenhouse gas inventories (as FERC has done in other environmental reviews) is misleading.

Capturing how marginal climate damages change as the background concentration changes is especially important because NEPA requires assessing both present and future impacts.[28] Different project alternatives can have different greenhouse gas consequences over time. Most simply, different alternatives could have different start dates or other consequential changes in timing. For example, FERC does not seriously consider an option to delay the pipeline project, but such an alternative could significantly change the climate consequences of leasing activity, especially because a project's relative greenhouse gas effect compared to other alternatives or to the no-action *status quo* can change over time as the fuel mix in the overall market changes.[29] For the reasons explained above, calculating

[23] Carbon dioxide also has cumulative effects on ocean acidification, in addition to cumulative radiative-forcing effects.

[24] *See* 2010 TSD, *supra* note 18, at 33 (explaining that the social cost of greenhouse gas estimates grow over time).

[25] Total U.S. carbon dioxide emissions in 2012 were 5,366.7 million metric tons (for all greenhouse gases, emissions were 6,529 MMT CO2 eq). *See* EPA, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2016* at ES-6, tbl. ES-2 (2018).

[26] Total U.S. carbon dioxide emissions in 2014 were 5,568.8 million metric tons (and for all greenhouse gases, 6,763 MMT CO2 eq.) *Id.*

[27] Interagency Working Group on the Social Cost of Greenhouse Gases, *Technical Support Document: Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis* at 25 tbl. A1 (2016) (calculating the central estimate at a 3% discount rate), https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/scc_tsd_final_clean_8_26_16.pdf [hereinafter 2016 TSD].

[28] NEPA requires agencies to weigh the "relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity," as well as "any irreversible and irretrievable commitments of resources." 42 U.S.C. § 4332(2)(C).

[29] *See* U.S. Energy Info. Admin., *Annual Energy Outlook 2018 with Projections to 2050* at 84 (2018) (projecting coal's share of electricity generation to decline over time, while renewables' share increases).

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volumes or percentages is insufficient to accurately compare the climate damages of project alternatives with varying greenhouse gas emissions over time. CO07-7 Cont'd

By factoring in projections of the increasing global stock of greenhouse gases as well as increasing stresses to physical and economic systems, the social cost of greenhouse gas metrics enable accurate and transparent comparisons of projects with varying greenhouse gas emissions over time.

Monetization Provides the Required Informational Context that Volume Estimates Lack CO07-8

NEPA requires sufficient informational context; the NGA requires a reasoned explanation of factors and more than "passing references." Yet without proper context, numbers like 10,000 tons in annual emissions from mobile sources[30] will be misinterpreted by people as meaningless, as practically zero. Indeed, in a country of over 300 million people and over 6.5 billion tons of annual greenhouse gas emissions, it is far too easy to make highly significant effects appear relatively trivial. For example, presenting all weather-related deaths as less than 0.1% of total U.S. deaths makes the risk of death by weather event sound trivial, but in fact that figure represents over 2,000 premature deaths per year[31]—hardly an insignificant figure.[32]

Similarly, many people will be unable to distinguish the significance of project alternatives or scenario analyses with different emissions: for example, whether the 10,000 tons per year increase in mobile emissions, or 353,000 tons annually from stationary sources[33] over the no action alternative is significant or not. As the Environmental Protection Agency's website explains, "abstract measurements" of so many tons of greenhouse gases can be rather inscrutable for the public, unless "translat[ed] . . . into concrete terms you can understand."[34] Abstract volume estimates fail to give people the required informational context due to another well-documented mental heuristic called "scope neglect." Scope neglect, as explained by Nobel laureate Daniel Kahneman, among others, causes people to ignore the size of a problem when estimating the value of addressing the problem. For example, in one often-cited study, subjects were unable to meaningfully distinguish between the value of saving 2,000 migratory birds from drowning in uncovered oil ponds, as compared to saving 20,000 birds.[35]

Scope neglect means many decisionmakers and members of the public would be unable to meaningfully distinguish the climate risks of 10,000 tons per year increase in mobile emissions, or 353,000 tons annually from stationary sources. While decisionmakers and the public certainly can discern that the numbers are not zero and that one number is higher, without any context it may be difficult to weigh the relative magnitude of the climate risks. In contrast, the climate risks would have been readily

[30] DEIS at 4-175.

[31] *Compare* Nat'l Ctr. for Health Stat., Ctrs. for Disease Control & Prevention, *Death Attributed to Heat, Cold, and Other Weather Events in the United States, 2006-2010* at 1 (2014) (reporting about 2000 weather-related deaths per year) *with* Nat'l Ctr. for Health Stat., *Deaths and Mortality*, https://www.cdc.gov/nchs/fastats/deaths.htm (reporting about 2.7 million U.S. deaths per year total).

[32] The public willingness to pay to avoid mortality is typically estimated at around $9.6 million (in 2016$). E.g., 83 Fed. Reg. 12,086, 12,098 (Mar. 19, 2018) (U.S. Coast Guard rule using the Department of Transportation's value of statistical life in a recent analysis of safety regulations). Losing 2,000 lives prematurely to weather-related events is equivalent to a loss of public welfare worth over $19 billion per year.

[33] EA at Appendix Table 4.

[34] EPA, *Greenhouse Gas Equivalencies Calculator. Available at* https://web.archive.org/web/20180212182940/ https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator (last updated Sept. 2017) ("Did you ever wonder what reducing carbon dioxide (CO_2) emissions by 1 million metric tons means in everyday terms? The greenhouse gas equivalencies calculator can help you understand just that, translating abstract measurements into concrete terms you can understand.").

[35] Daniel Kahneman et al., *Economic Preferences or Attitude Expressions? An Analysis of Dollar Responses to Public Issues*, 19 J. Risk & Uncertainty 203, 212-213 (1999).

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CO07-8 See response to comment CO7-3.

discernible through application of the social cost of greenhouse gas metrics. In this example, while an increase of 363,000 tons in direct operational emissions may seem trivial, in fact those direct emissions will cause over $18 million per year in climate damages, and 1.3 million tons or more from electricity consumption will generate another $67 million per year in climate damages.[36] CO07-8 Cont'd

In general, non-monetized effects are often irrationally treated as worthless.[37] On several occasions, courts have struck down administrative decisions for failing to give weight to non-monetized effects.[38] Most relevantly, in *Center for Biological Diversity v. NHTSA*, the U.S. Court of Appeals for the Ninth Circuit found it arbitrary and capricious to give zero value "to the most significant benefit of more stringent [fuel economy] standards: reduction in carbon emissions."[39] Monetizing climate damages provides the informational context required by NEPA and the NGA, whereas a simple tally of emissions volume and rote, qualitative, generic description of climate change are misleading and fail to give the public and decisionmakers the required information about the magnitude of discrete climate effects.[40]

Climate Effects Must Be Monetized If Other Costs and Benefits Are Monetized CO07-9

Though NEPA does not require a full and formal cost-benefit analysis,[41] agencies' approaches to assessing costs and benefits must be balanced and reasonable. Courts have warned agencies, for example, that "[e]ven though NEPA does not require a cost-benefit analysis," an agency cannot selectively monetize benefits in support of its decision while refusing to monetize the costs of its action.[42]

In *High Country Conservation Advocates v. Forest Service*, the U.S. District Court of Colorado found that it was "arbitrary and capricious to quantify the *benefits* of the lease modifications and then explain that a similar analysis of the *costs* was impossible when such an analysis was in fact possible."[43] The court explained that, to support a decision on coal mining activity, the agencies had "weighed several specific economic benefits—coal recovered, payroll, associated purchases of supplies and services, and royalties," but arbitrarily failed to monetized climate costs using the readily available social cost of carbon protocol.[44] Similarly, in *Montana Environmental Information Center v. Office of Surface Mining*

[36] *See supra* note 5 and accompanying text for calculation methodology.
[37] Richard Revesz, *Quantifying Regulatory Benefits*, 102 Cal. L. Rev. 1424, 1434-35, 1442 (2014).
[38] *See id.* at 1428, 1434.
[39] 538 F.3d at 1199.
[40] *See* 42 U.S.C. § 4332(2)(B) (requiring agencies to "identify and develop methods and procedures . . . which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decisionmaking along with economic and technical considerations").
[41] 40 C.F.R. § 1502.23 ("[T]he weighing of the merits and drawbacks of the various alternatives need not be displayed in a monetary cost-benefit analysis."); *but see e.g.*, *Sierra Club v. Sigler*, 695 F.2d 957, 978-79 (5th Cir. 1983) (holding that NEPA "mandates at least a broad, informal cost-benefit analysis," and so agencies must "fully and accurately" and "objectively" assess environmental, economic, and technical costs); *Chelsea Neighborhood Ass'ns v. U.S. Postal Serv.*, 516 F.2d 378, 387 (2d Cir. 1975) ("NEPA, in effect, requires a broadly defined cost-benefit analysis of major federal activities."); *Calvert Cliffs' Coordinating Comm. v. U.S. Atomic Energy Comm'n*, 449 F.2d 1109, 1113 (D.C. Cir. 1971) ("NEPA mandates a rather finely tuned and 'systematic' balancing analysis" of "environmental costs" against "economic and technical benefits"); *Nat'l Wildlife Fed. v. Marsh*, 568 F. Supp. 985, 1000 (D.D.C. 1983) ("The cost-benefit analysis of NEPA is concerned primarily with environmental costs. . . . A court may examine the cost-benefit analysis only as it bears upon the function of insuring that the agency has examined the environmental consequences of a proposed project."); *High Country*, 52 F.Supp.3d at 1191 (holding that NEPA does not require cost-benefit analysis, although monetizing benefits but not costs is arbitrary and capricious).
[42] *High Country Conservation Advocates*, 52 F. Supp. 3d at 1191; *accord. MEIC v. Office of Surface Mining*, 274 F. Supp. 3d at 1094-99 (holding it was arbitrary for the agency to quantify benefits in an EIS while failing to use the social cost of carbon to quantify costs, as well as arbitrary to imply there would be no effects from greenhouse gas emissions).
[43] 52 F. Supp. 3d at 1191.
[44] *Id.*

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CO07-9 See response to comment CO7-3.

CO07-10 See response to comment CO7-3.

(*MEIC v. OSM*), the U.S. District Court of Montana followed the lead set by *High Country* and likewise held an environmental assessment to be arbitrary and capricious because it quantified the benefits of action (such as employment payroll, tax revenue, and royalties) while failing to use the social cost of carbon to quantify the costs.[45] CO07-9 Cont'd

High Country and *MEIC v. OSM* are the latest applications of a broader line of case law in which courts find it arbitrary and capricious to apply inconsistent protocols for analyzing some effects compared to others, especially when the inconsistency obscures some of the most significant effects.[46] For example, in *Center for Biological Diversity v. National Highway Traffic Safety Administration*, the U.S. Court of Appeals for the Ninth Circuit ruled that, because the agency had monetized other uncertain costs and benefits of its vehicle fuel efficiency standard—like traffic congestion and noise costs—its "decision not to monetize the benefit of carbon emissions reduction was arbitrary and capricious."[47] Specifically, it was arbitrary to "assign[ ] no value to *the most significant benefit* of more stringent [vehicle fuel efficiency] standards: reduction in carbon emissions."[48] When an agency bases a decision on cost-benefit analysis, it is arbitrary to "put a thumb on the scale by undervaluing the benefits and overvaluing the costs."[49] Similarly, the U.S. Court of Appeals for the District of Columbia Circuit has chastised agencies for "inconsistently and opportunistically fram[ing] the costs and benefits of the rule [and] fail[ing] adequately to quantify certain costs or to explain why those costs could not be quantified"[50]; and the U.S. Court of Appeals for the Tenth Circuit has remanded an environmental impact statement because "unrealistic" assumptions "misleading[ly]" skewed comparison of the project's positive and negative effects.[51]

Here, the draft environmental impact statement reports $61.3 million in state and local taxes from annual operations, as well as $334 million in annual income and $1.2 billion in annual output,[52] categories of economic benefits similar to the income and output benefits highlighted in *High Country* and *MEIC*. In fact, FERC refers to these economic impacts as the "positive benefits" of the project.[53] It is inconsistent for FERC to report impacts like earnings in monetized figures while failing to use another readily available protocol to monetize important environmental costs.

II. The Social Cost of Greenhouse Gas Metric Is the Appropriate Tool to Assess the Significance of a Project's Emissions CO07-10

The draft environmental assessment claims that "there is no standard methodology to determine whether, and to what extent, a project's incremental contribution to GHG emissions would result in physical effects on the environment," and also insists that "[t]here is no generally accepted significance criteria for GHG emissions."[54] However, FERC is wrong: applying the social cost of greenhouse gas

[45] 274 F. Supp. 3d at 1094-99 (also holding that it was arbitrary to imply that there would be zero effects from greenhouse gas emissions).

[46] Other cases from different courts that have declined to rule against failures to use the social cost of carbon in NEPA analyses are all distinguishable by the scale of the action or by whether other effects were quantified and monetized in the analysis. *See League of Wilderness Defenders v. Connaughton*, No. 3:12-cv-02271-HZ (D. Ore., Dec. 9, 2014); *EarthReports v. FERC*, 15-1127, (D.C. Cir. July 15, 2016); *WildEarth Guardians v. Zinke*, 1:16-CV-00605-RJ, at 23-24, (D. N.M. Feb. 16, 2017).

[47] 538 F.3d 1172, 1203 (9th Cir. 2008).

[48] *Id.* at 1199.

[49] *Id.* at 1198.

[50] *Bus. Roundtable v. SCC*, 647 F.3d 1144, 1148-49 (D.C. Cir. 2011)

[51] *Johnston v. Davis*, 698 F.2d 1088, 1094–95 (10th Cir. 1983)

[52] DEIS at 4-123, 4-129.

[53] DEIS at 4-293 ("Positive benefits from the new jobs and workers . . . [include] increasing revenue for local business owners and generating new tax revenue."); *id.* (referring to the "positive, permanent impact on the local economy").

[54] DEIS at 4-306.

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protocol to monetize the incremental climate impacts of specific projects is appropriate, straightforward, and meaningfully facilitates review of the significance of a project's environmental impacts. CO07-10 Cont'd

Monetization Is Appropriate and Useful in Any Decision with Significant Climate Impacts, and Its Use Should Not Be Limited to Regulatory Analyses

Though the federal Interagency Working Group on the Social Cost of Greenhouse Gases originally developed its estimates of the social cost of greenhouse gases to harmonize the metrics used by agencies in their various regulatory impact analyses, there is nothing in the numbers' development that would limit applications to other decisionmaking contexts. The social cost of greenhouse gases measures the marginal cost of any additional unit of greenhouse gases emitted into the atmosphere. The government action that precipitated a particular unit of emissions—whether a regulation, the granting of a permit, or a project approval—is irrelevant to the marginal climate damages caused by the emissions. Whether emitted by a leaking pipeline or the fossil fuel extraction process, whether emitted because of a regulation or a resource management decision, whether emitted in Colorado or Maine or anywhere else, the marginal climate damages per unit of emissions remain the same. Indeed, the social cost of greenhouse gases has been used by many federal and state agencies in environmental impact analyses[55] and in resource management decisions.[56]

The Social Cost of Greenhouse Gas Metrics Provides a Tool to Assess the Significance of Individual Physical Impacts CO07-11

The social cost of greenhouse gas methodology is well suited to measure the marginal climate damages of individual projects. These protocols were developed to assess the cost of actions with "marginal" impacts on cumulative global emissions, and the metrics estimate the dollar figure of damages for one extra unit of greenhouse gas emissions. This marginal cost is calculated using integrated assessment models. These models translate emissions into changes in atmospheric greenhouse concentrations, atmospheric concentrations into changes in temperature, and changes in temperature into economic damages. A range of plausible socio-economic and emissions trajectories are used to account for the scope of potential scenarios and circumstances that may actually result in the coming years and decades. The marginal cost is attained by first running the models using a baseline emissions trajectory, and then running the same models again with one additional unit of emissions. The difference in damages between the two runs is the marginal cost of one additional unit. The approach assumes that the marginal damages from increased emissions will remain constant for small emissions increases relative to gross global emissions. In other words, the monetization tools are in fact perfectly suited to measuring the marginal effects of individual projects or other discrete agency actions.

[55] For example, in August 2017, the Bureau of Ocean Energy Management called the social cost of carbon "a useful measure to assess the benefits of CO2 reductions and inform agency decisions," and applied the metric in an environmental impact statement to monetize the emissions difference of about 5 million metric tons per year between the proposed oil and gas development project and the no-action baseline, *Draft Environmental Impact Statement—Liberty Development Project in the Beaufort Sea, Alaska* at 3-129, 4-50 (2017). More generally, agencies have used IWG's social cost of greenhouse gas estimates not only in scores of rulemakings but also in NEPA analyses for resource management decisions. *See* Peter Howard & Jason Schwartz, *Think Global: International Reciprocity as Justification for a Global Social Cost of Carbon*, 42 Columbia J. Envtl. L. 203, 270-84 (2017) (listing all uses by federal agencies through July 2016).

[56] States have used the social cost of greenhouse gases in decisions about electricity planning. *See* Iliana Paul et al., *The Social Cost of Greenhouse Gases and State Policy: A Frequently Asked Questions Guide* (Policy Integrity Report, 2017), http://policyintegrity.org/files/publications/SCC_State_Guidance.pdf.

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CO07-11 See response to comment CO7-3.

Some of the incremental impacts on the environment that the social cost of greenhouse gas protocol captures—and which the DEIS fails to meaningfully analyze—include property lost or damaged; impacts to agriculture, forestry, and fisheries; impacts to human health; changes in fresh water availability; ecosystem service impacts; impacts to outdoor recreation and other non-market amenities; and some catastrophic impacts, including potentially rapid sea-level rise, damages at very high temperatures, or unknown events.[57] A key advantage of using the social cost of greenhouse gas tool is that each physical impact—such as sea-level rise and increasing temperatures—need not be assessed in isolation. Instead, the social cost of greenhouse gas tool conveniently groups together the multitude of climate impacts and, consistent with NEPA regulations,[58] enables agencies to assess whether all those impacts are cumulatively significant and to then compare those impacts with other impacts or alternatives using a common metric. CO07-11 Cont'd

By applying the social cost of greenhouse gases, the common metric of money provides the very framework for assessing significance that FERC is looking for. While the relative significance of 20,000 additional tons of carbon dioxide per year versus 2 million additional tons per year may be somewhat challenging to discern, the relative significance of $1 million per year in climate damages versus $100 million per year in climate damages is much easier to discern. In this case, applying the social cost of greenhouse gases reveals that the project's direct carbon emissions will cause at least tens of millions of dollars per year in property damage, lost productivity, premature death, and other quantifiable effects.[59] Determining the significance of tens of millions of dollars in annual climate damages still requires FERC to exercise its professional judgment, but that is no different than how FERC routinely applies its judgment to determine the significance of impacts to landowners, the local community, or the tax base. Compared to volume estimates, the monetized figures of climate damage can then be reasonably weighed against reasonable judgments about a project's other qualitative, quantitative, or monetized costs and benefits. In short, applying the social cost of greenhouse gases is both straightforward and meaningfully informs FERC's decisions under NEPA and the NGA in ways that volume estimates alone cannot.

The Tons of Greenhouse Gas Emissions at Stake Here Are Clearly Significant CO07-12

While there may not be a bright-line test for determining significance, the potential emissions from this project are clearly significant and warrant monetization. In *High Country*, the District Court for the District of Colorado found that it was arbitrary for the Forest Service not to monetize the "1.23 million

[57] These impacts are all included to some degree in the three integrated assessment models (IAMs) used by the IWG (namely, the DICE, FUND, and PAGE models), though some impacts are modeled incompletely, and many other important damage categories are currently omitted from these IAMs. *Compare* Interagency Working Group on the Social Cost of Carbon, *Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis* at 6-8, 29-33 (2010), https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf [hereinafter 2010 TSD]; *with* Peter Howard, *Omitted Damages: What's Missing from the Social Cost of Carbon* (Cost of Carbon Project Report, 2014), http://costofcarbon.org/files/Omitted_Damages_Whats_Missing_From_the_Social_Cost_of_Carbon.pdf. For other lists of actual climate effects, including air quality mortality, extreme temperature mortality, lost labor productivity, harmful algal blooms, spread of west nile virus, damage to roads and other infrastructure, effects on urban drainage, damage to coastal property, electricity demand and supply effects, water supply and quality effects, inland flooding, lost winter recreation, effects on agriculture and fish, lost ecosystem services from coral reefs, and wildfires, see EPA, *Multi-Model Framework for Quantitative Sectoral Impacts Analysis: A Technical Report for the Fourth National Climate Assessment* (2017); U.S. Global Change Research Program, *Climate Science Special Report: Fourth National Climate Assessment* (2017); EPA, *Climate Change in the United States: Benefits of Global Action* (2015); Union of Concerned Scientists, *Underwater: Rising Seas, Chronic Floods, and the Implications for U.S. Coastal Real Estate* (2018).

[58] 40 C.F.R. § 1508.27(b)(7) (explaining that actions can be significant if related to individually insignificant but cumulatively significant impacts).

[59] *See supra* note 5

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CO07-12 See response to comment CO7-3.

tons of carbon dioxide equivalent emissions [from methane] the West Elk mine emits annually."[60] That suggests a threshold for monetization far below the tons of greenhouse gases at stake here. In *MEIC v. OSM*, the District Court for the District of Montana found it was arbitrary for the Office of Surface Mining not to monetize the 23.16 million metric tons.[61] In *Center for Biological Diversity*, the Ninth Circuit found that it was arbitrary for the Department of Transportation not to monetize the 35 million metric ton difference in lifetime emissions from increasing the fuel efficiency of motor vehicles:[62] given the estimated lifetime of vehicles sold in the years 2008-2011 (sometimes estimated at about 15 years on average), this could represent as little two million metric tons per year. In a recent environmental impact statement from the Bureau of Ocean Energy Management published in August 2017, the agency explained that the social cost of carbon was "a useful measure" to apply to a NEPA analysis of an action anticipated to have a difference in greenhouse gas emissions compared to the no-action baseline of about 25 million metric tons over a 5-year period,[63] or about 5 million metric tons per year. CO07-12 Cont'd

Under any reasonable application of the social cost of greenhouse gas metrics, the emissions from the project will cause tens of millions of dollars in climate damages. Tellingly, FERC had no problem reporting the potential for the project to generate $13.5 million in per year in annual state taxes.[64] A potential climate cost of hundreds of millions of dollars is also significant, particularly in the context of a document the very purpose of which is to evaluate a project's *environmental* impacts.

Monetizing Climate Damages Is Appropriate and Useful Regardless of Whether Every Effect Can Be Monetized in a Full Cost-Benefit Analysis CO07-13

Monetizing one key impact still provides useful information for decisonmakers and the public even when monetizing other impacts is not feasible. The social cost of greenhouse gases enables a more accurate and transparent comparison of alternatives along the dimension of climate impacts even if other costs and benefits cannot be quantified, and "breakeven analysis" could provide a framework for making decisions when some effects but not others are monetized. Climate damages can and should be monetized even if other costs and benefits are harder to quantify or monetize and so must be discussed qualitatively. Many effects can readily be quantified and monetized, and agencies should generally do so when feasible; other effects, like water quality, are notoriously difficult to quantify and monetize, due to the geographically idiosyncratic nature of individual water bodies. Greenhouse gases, by comparison, have the same impact on climate change no matter where they are emitted, and those impacts are readily monetized using the social cost of greenhouse methodology. Regardless of whether all other effects can be monetized, using the social cost of greenhouse gases provides useful and necessary information to the public and decisionmakers. In particular, whether or not other effects are monetized, using the social cost of greenhouse gases will facilitate comparison between alternative options along the dimension of climate change. As discussed above, different alternatives could have varying greenhouse gas consequences over time, and monetization provides the best means of comparing project alternatives along the dimension of climate change.

Moreover, analytical frameworks exist to weigh qualitative effects alongside monetized effects. NEPA regulations, for example, first state that if there are "important qualitative considerations," then the ultimate "weighing of the merits and drawbacks of the various alternatives" should not be displayed

[60] 52 F. Supp. 3d at 1191 (quoting an e-mail comment on the draft statement for the quantification of tons).
[61] *MEIC v. Office of Surface Mining* at 36-37.
[62] 538 F.3d at 1187.
[63] BOEM, *Liberty Development and Production Plan Draft EIS* at 3-129, 4,50 (2017) (89,940,000 minus 64,570,000 is about 25 million).
[64] DEIS at 4-129.

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CO07-13 See response to comment CO7-3.

CO07-14 See response to comment CO7-3.

exclusively as a "monetary cost-benefit analysis." Nevertheless, NEPA regulations further acknowledge that when monetization of costs and benefits is "relevant to the choice among environmentally different alternatives," "that analysis" can be presented alongside "any analyses of unquantified environmental impacts, values, and amenities."[65] In other words, the monetization of some impacts does not require the monetization of all impacts. CO07-13

The Office of Management and Budget's *Circular A-4*[66] guidance to agencies on conducting economic analysis also provides a framework for weighing monetized and qualitative costs and benefits, called break-even analysis:

> It will not always be possible to express in monetary units all of the important benefits and costs. When it is not, the most efficient alternative will not necessarily be the one with the largest quantified and monetized net-benefit estimate. In such cases, you should exercise professional judgment in determining how important the non-quantified benefits or costs may be in the context of the overall analysis. If the non-quantified benefits and costs are likely to be important, you should carry out a "threshold" analysis to evaluate their significance. Threshold or "break-even" analysis answers the question, "How small could the value of the non-quantified benefits be (or how large would the value of the non-quantified costs need to be) before the rule would yield zero net benefits?" In addition to threshold analysis you should indicate, where possible, which non-quantified effects are most important and why.[67]

Even without using something as formal as a break-even analysis, it is clear that monetizing climate damages provides useful information whether or not every effect can be monetized in a full cost-benefit analysis.

III. FERC Should Use the Interagency Working Group's 2016 Estimates of the Social Cost of Carbon, Methane, and Nitrous Oxide CO07-14

In 2016, the IWG published updated central estimates for the social cost of greenhouse gases: $50 per ton of carbon dioxide, $1440 per ton of methane, and $18,000 per ton of nitrous oxide (in 2017 dollars for year 2020 emissions).[68] Agencies must continue to use estimates of a similar or higher[69] value in their analyses and decisionmaking. A recent Executive Order disbanding the IWG does not change the fact that the IWG estimates still reflect the best available data and methodologies.

IWG's Methodology Is Rigorous, Transparent, and Based on Best Available Data

Beginning in 2009, the IWG assembled experts from a dozen federal agencies and White House offices to "estimate the monetized damages associated with an incremental increase in carbon emissions in a given year" based on "a defensible set of input assumptions that are grounded in the existing scientific

[65] 40 C.F.R. § 1502.23.

[66] Though *Circular A-4* focus on agencies' regulatory analyses under Executive Order 12,866, the document nevertheless more generally has distilled best practices on economic analysis and is a useful guide to all agencies undertaking an assessment of costs and benefits.

[67] OMB, Circular A-4 at 2 (2003).

[68] U.S. Interagency Working Group on the Social Cost of Greenhouse Gases, "Technical support document: Technical update of the social cost of carbon for regulatory impact analysis under executive order 12866 & Addendum: Application of the methodology to estimate the social cost of methane and the social cost of nitrous oxide" (2016), available at https://obamawhitehouse.archives.gov/omb/oira/social-cost-of-carbon.

[69] See, e.g., Richard L. Revesz et al., Global Warming: Improve Economic Models of Climate Change, 508 NATURE 173 (2014) (explaining that current estimates omit key damage categories and, therefore, are very likely underestimates).

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and economic literature."[70] IWG's methods combined three frequently used models built to predict the economic costs of the physical impacts of each additional ton of carbon.[71] The models together incorporate such damage categories as: agricultural and forestry impacts, coastal impacts due to sea level rise, impacts from extreme weather events, impacts to vulnerable market sectors, human health impacts including malaria and pollution, outdoor recreation impacts and other non-market amenities, impacts to human settlements and ecosystems, and some catastrophic impacts.[72] IWG ran these models using a baseline scenario including inputs and assumptions drawn from the peer-reviewed literature, and then ran the models again with an additional unit of carbon emissions to determine the increased economic damages.[73] IWG's social cost of carbon estimates were first issued in 2010 and have been updated several times to reflect the latest and best scientific and economic data.[74] CO07-14 Cont'd

Following the development of estimates for carbon dioxide, the same basic methodology was used in 2016 to develop the social cost of methane and social cost of nitrous oxide—estimates that captures the distinct heating potential of methane and nitrous oxide emissions.[75] These additional metrics used the same economic models, the same treatment of uncertainty, and the same methodological assumptions that IWG applied to the social cost of carbon, and these new estimates underwent rigorous peer-review.[76]

IWG's methodology has been repeatedly endorsed by reviewers. In 2014, the U.S. Government Accountability Office concluded that IWG had followed a "consensus-based" approach, relied on peer-reviewed academic literature, disclosed relevant limitations, and adequately planned to incorporate new information through public comments and updated research.[77] In 2016 and 2017, the National Academies of Sciences issued two reports that, while recommending future improvements to the methodology, supported the continued use of the existing IWG estimates.[78] And in 2016, the U.S. Court of Appeals for the Seventh Circuit held that the Department of Energy's reliance on IWG's social cost of carbon was reasonable.[79] It is, therefore, unsurprising that leading economists and climate policy experts have endorsed the Working Group's values as the best available estimates.[80]

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[70] IWG, *Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866* (2010) ("2010 TSD"). *Available at* https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf.

[71] *Id.* at 5. These models are DICE (the Dynamic Integrated Model of Climate and the Economy), FUND (the Climate Framework for Uncertainty, Negotiation, and Distribution), and PAGE (Policy Analysis of the Greenhouse Effect).

[72] *Id.* at 6-8.

[73] *Id.* at 24-25.

[74] IWG, *Technical Update of the Social Cost of Carbon* at 5–29 (2016). *Available at* https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/ scc_tsd_final_clean_8_26_16.pdf.

[75] *See* 2016 IWG Addendum at 2.

[76] *Id.* at 3.

[77] Gov't Accountability Office, *Regulatory Impact Analysis: Development of Social Cost of Carbon Estimates* 12-19 (2014). Available at http://www.gao.gov/assets/670/665016.pdf.

[78] Nat'l Acad. Sci., Engineering & Med., *Valuing Climate Damages: Updating Estimation of the Social Cost of Carbon Dioxide* 3 (2017), https://www.nap.edu/read/24651/chapter/1; Nat'l Acad. Sci., Engineering & Med., *Assessment of Approaches to Updating the Social Cost of Carbon: Phase 1 Report on a Near-Term Update* 1–2 (2016); https://www.nap.edu/read/21898/chapter/1.

[79] *Zero Zone*, 832 F.3d at 679.

[80] See, e.g., Richard Revesz et al., *Best Cost Estimate of Greenhouse Gases*, 357 Science 655 (2017); Michael Greenstone et al., *Developing a Social Cost of Carbon for U.S. Regulatory Analysis: A Methodology and Interpretation*, 7 Rev. Envtl. Econ. & Pol'y 23, 42 (2013); Richard L. Revesz et al., *Global Warming: Improve Economic Models of Climate Change*, 508 Nature 173 (2014) (co-authored with Nobel Laureate Kenneth Arrow, among others).

CO07-15 See response to comment CO7-3.

A Recent Executive Order Does Not Change the Requirements to Monetize Climate Damages CO07-15

In March 2017, President Trump disbanded the IWG and withdrew their technical support documents.[81] Nevertheless, Executive Order 13,783 assumes that federal agencies will continue to "monetiz[e] the value of changes in greenhouse gas emissions" and instructs agencies to ensure such estimates are "consistent with the guidance contained in OMB Circular A-4."[82] Consequently, while federal agencies no longer benefit from ongoing technical support from the IWG on use of the social cost of greenhouse gases, by no means does the new Executive Order imply that agencies should not monetize important effects in their environmental impact statements. The Executive Order does not prohibit agencies from relying on the same choice of models as the IWG, the same inputs and assumptions as the IWG, the same statistical methodologies as the IWG, or the same ultimate values as derived by the IWG. To the contrary, because the Executive Order requires consistency with Circular A-4, as agencies follow the Circular's standards for using the best available data and methodologies, they will necessarily choose similar data, methodologies, and estimates as the IWG, since the IWG's work continues to represent the best available estimates.[83] The Executive Order does not preclude agencies from using the same range of estimates as developed by the IWG, so long as the agency explains that the data and methodology that produced those estimates are consistent with Circular A-4 and, more broadly, with standards for rational decisionmaking.

Similarly, the Executive Order's withdrawal of the Council on Environmental Quality's guidance on greenhouse gases,[84] does not—and legally cannot—remove agencies' statutory requirement to fully analyze and disclose the environmental impacts of greenhouse gas emissions. As the Council on Environmental Quality explained in its withdrawal, the "guidance was not a regulation," and "[t]he withdrawal of the guidance does not change any law, regulation, or other legally binding requirement."[85] In other words, when the guidance originally recommended the appropriate use of the social cost of greenhouse gases in environmental impact statements,[86] it was simply explaining that use of the social cost of greenhouse gases is consistent with longstanding NEPA regulations and case law, all of which are still in effect today.

Notably, some agencies under the Trump administration have continued to use the IWG estimates even following the Executive Order. For example, in August 2017, the Bureau of Ocean Energy Management called the social cost of carbon "a useful measure" and applied it to analyze the consequences of offshore oil and gas drilling.[87] And in July 2017, the Department of Energy used the IWG's estimates for carbon and methane emissions to analyze energy efficiency regulation, describing the social cost of methane as having "undergone multiple stages of peer review."[88]

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[81] Exec. Order No. 13,783 § 5(b), 82 Fed. Reg. 16,093 (Mar. 28, 2017).

[82] *Id.* § 5(c).

[83] *See* Richard L. Revesz et al., *Best Cost Estimate of Greenhouse Gases*, 357 SCIENCE 6352 (2017) (explaining that, even after Trump's Executive Order, the social cost of greenhouse gas estimate of around $50 per ton of carbon dioxide is still the best estimate).

[84] Exec. Order 13,783 § 3(c)

[85] 82 Fed. Reg. 16,576, 16,576 (Apr. 5, 2017).

[86] *See* CEQ, *Revised Draft Guidance on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews* at 16 (Dec. 2014), *available at* https://obamawhitehouse.archives.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance_searchable.pdf ("[A]lthough developed specifically for regulatory impact analyses, the Federal social cost of carbon, which multiple Federal agencies have developed and used to assess the costs and benefits of alternatives in rulemakings, offers a harmonized, interagency metric that can provide decisionmakers and the public with some context for meaningful NEPA review.").

[87] *Draft Environmental Impact Statement—Liberty Development Project in the Beaufort Sea, Alaska* at 3-129.

[88] Energy Conservation Program: Energy Conservation Standards for Walk-In Cooler and Freezer Refrigeration Systems, 82 Fed. Reg. 31,808, 31,811, 31,857 (July 10, 2017).

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Sincerely,

Rachel Cleetus, Ph.D., Lead Economist and Climate Policy Manager, Union of Concerned Scientists
Denise Grab, Western Regional Director, Institute for Policy Integrity, NYU School of Law*
Jayni Hein, Policy Director, Institute for Policy Integrity, NYU School of Law*
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*No part of this document purports to present New York University School of Law's views, if any.

CLNG
center for liquefied natural gas

January 24, 2019

Chairman Neil Chatterjee
Federal Energy Regulatory Commission
888 First Street NE
Washington, D.C. 20426
Re: Annova LNG DEIS

Docket Nos. (CP16-480-000)

Dear Chairman Chatterjee:

The Center for Liquefied Natural Gas (CLNG) appreciates the opportunity to express its support for the permitting of additional liquefied natural gas (LNG) export capacity in the United States, including Annova LNG project to be constructed in the Port of Brownsville, a deepwater port in South Texas.

CLNG advocates for public policies that advance the export of LNG from the U.S. to developed and emerging markets around the world. A committee of the Natural Gas Supply Association (NGSA), CLNG represents the full LNG value chain, including LNG producers, shippers, terminal operators, and developers, providing it with unique insight into the ways in which the vast potential of this abundant and versatile fuel can be fully realized.

LNG offers tremendous benefits for consumers and the environment. Here are a few facts about LNG, its chemical properties, and the safety record of the global LNG industry:

LNG is natural gas in liquid form chilled to -260 degrees Fahrenheit. As a liquid, LNG occupies 1/600th of the volume of gas.

LNG is stored at ambient pressure and, when exposed to a source of heat, LNG vaporizes back into natural gas. If spilled on land or water, it vaporizes and leaves no residue behind.

LNG is not toxic, corrosive, explosive, or flammable.

According to the U.S. Department of Energy, "for more than 40 years, the safety record of the global LNG industry has been excellent, due to attention to detail in engineering, construction, and operations ... The physical and chemical properties of LNG render it safer than other commonly used hydrocarbons."[1]

Throughout decades of safe operations, the LNG industry has proven its commitment to fully comply with regulations and take extra care to prevent accidents. As demand for natural gas

[1] U.S. Department of Energy, "Liquefied Natural Gas: Understanding the Basic Facts," 2013.

rises, the LNG industry will continue to adopt, implement, and update safety measures that protect the health and well-being of all parties.

Meanwhile, technological breakthroughs in the U.S. oil and natural gas industry have unleashed an energy renaissance, establishing the U.S. as the world's largest natural gas producer. Domestic production continues to grow and, according to the Energy Information Administration (EIA), is expected to reach nearly 100 Bcf/d by 2025, driven primarily by activity in the Permian Basin and the U.S. Northeast.

The U.S. has enough natural gas to supply affordable energy domestically for the foreseeable future as well as to significantly increase U.S. participation in the highly competitive global LNG markets. Because our supply of natural gas is so abundant, operating and planned export capacity are helping provide stability to the domestic market. In some regions of the country, natural gas production has exceeded demand. LNG exports offer an important market for surplus gas, which often comes associated with oil production, and helps to keep natural gas and oil production steady and predictable.

Significant U.S. production growth requires new markets for natural gas beyond domestic consumption. For producers in the Permian Basin and Eagle Ford Shale, in particular, U.S. LNG projects on the Texas Gulf Coast provide energy producers an important link to global markets and a means of mitigating wasteful flaring of valuable resources into the atmosphere.

U.S. LNG exports also offer clear environmental benefits internationally. A 2014 study conducted for the U.S. Department of Energy found that LNG exports could reduce global greenhouse gas emissions by displacing more carbon-intensive fuels in importing nations.2 Greater use of natural gas in importing nations will also help reduce traditional pollutants, since natural gas creates little to no emissions of sulfur dioxide, nitrogen oxides, or particulate matter that can lead to smog.3

LNG terminals like the proposed Annova LNG's project contribute significantly to the U.S. economy and generate thousands of U.S. jobs during construction and operations. LNG exports could increase U.S. GDP by between $1.7 trillion to $3.3 trillion and add 7.3 to 15.5 million jobs per year between 2013 and 2050.4 U.S. LNG projects can also play a significant role in reducing the U.S. trade deficit and increasing U.S. energy independence. CO08-1

Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore CO08-2

[2] U.S. Department of Energy, National Energy Technology Laboratory, "Lifecycle Greenhouse Gas Perspective on Exporting LNG from the United States," May 29, 2014.

[3] Leidos, Inc., "A Comparison of Emissions from Major Fuels Used to Generate Electricity in the U.S.," 2016.

[4] ICF (prepared for LNG Allies), "Calculating the Economic Benefits of U.S. LNG Exports," April 17, 2018.

CO08 continued, page 2 of 3

CO08-1 Thank you for your comment.

CO08-2 Thank you for your comment.

tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. CO08-2 Cont'd

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. CO08-3

With global demand for natural gas only expected to grow, the U.S. has a unique opportunity to become a major global supplier of natural gas – and a limited time window to capture it and all the associated domestic and international benefits. Planned U.S. LNG projects like Annova LNG will facilitate the export of abundant, reliable, clean-burning, U.S.-produced natural gas, delivering long-term economic, trade, and environmental benefits. We appreciate the FERC staff's continued commitment to the review of U.S. LNG projects, and respectfully request the final approval for all pending LNG projects, including the Annova LNG project and as soon as possible. CO08-4

Respectfully,

Charlie Riedl

Executive Director

Center for Liquefied Natural Gas

CO08 continued, page 3 of 3

CO08-3 Thank you for your comment.

CO08-4 Thank you for your comment.

4 Houston Center
1221 Lamar Street, Suite 750
Houston, TX 77010

February 4, 2019

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

Re: Annova Comments on Draft Environmental Impact Statement
Annova LNG Common Infrastructure, LLC, et al., Docket No. CP16-480-000

Dear Ms. Bose:

Attached please find Annova's Privileged and Confidential designated Comments on the Draft Environmental Impact Statement. Material in this submission contains proprietary and competitively sensitive commercial information. In accordance with section 388.112 of the Commission's regulations, 18 C.F.R. § 388.112 (2018), Annova hereby requests privileged treatment for this material and states that this filing contains material the Commission routinely treats as privileged and exempt from mandatory disclosure under the Freedom of Information Act. Annova has labeled this material as "Privileged and Confidential Information – Do Not Release".

Respectfully submitted,

/s/ Susan B. Bergles

Counsel to Annova LNG Common Infrastructure, LLC; Annova LNG Brownsville A, LLC; Annova LNG Brownsville B, LLC; and Annova LNG Brownsville C, LLC

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cc: Eric Tomasi, FERC
John Peconom, FERC

CO09 Annova LNG, page 1 of 3

CO09-1 Section 4.9.10.1 of the final EIS has been updated to include some of the non-sensitive information that is provided in this filing on the potential off-site parking locations. We have retained a recommendation that Annova provide additional information prior to construction.

Attachment A1

Addendum to Traffic Impact Analysis

CUI//PRIV

PRIVILEGED AND CONFIDENTIAL

Do Not Release

Attachment A2

Phone Log of Conference Call with TxDOT on January 18, 2019

CUI//PRIV

PRIVILEGED AND CONFIDENTIAL

Do Not Release

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

In the Matter of
Annova LNG Brownsville Project CP16-480

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED ANNOVA LNG BROWNSVILLE PROJECT

Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera (collectively, "Commenters") submit these comments regarding the regarding the Federal Energy Regulatory Commission's ("FERC" or "the Commission") draft environmental impact statement ("DEIS") for Annova LNG Common Infrastructure, LLC, *et al.*'s ("Annova's") proposed liquefied natural gas ("LNG") export terminal.

In Docket CP16-480, Annova seeks authorization under section 3(a) of the Natural Gas Act, 15 U.S.C. § 717b(a), to site, construct and operate a new liquefied natural gas export and truck loading terminal near Brownsville, Texas, with a nameplate capacity of 0.9 billion cubic feet per day (bcf/d).

As commenters explain below, the DEIS for this Project fails to satisfy the obligations imposed by the National Environmental Policy Act ("NEPA"). The DEIS contains numerous informational gaps, and reaches multiple conclusions that lack support or are contrary to the available evidence. These deficiencies are severe enough that they must be corrected with a renewed draft EIS and a fresh opportunity for the public comment. Ultimately, however, it is clear that the Project will have such severe adverse impacts on the local environment, surrounding CO10-1

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 1*

CO10 Sierra Club, page 1 of 113

CO10-1 We do not agree that the draft EIS fails to satisfy NEPA, or that a supplemental draft EIS is required. See responses to specific comments below.

communities, regions supplying the gas to be exported, and the climate as a whole, that the Project is contrary to the public interest, cannot satisfy other applicable law, and must be denied. CO10-1

Table of Contents

CO10-2

I. FERC Has Not Provided Sufficient Opportunity for Public Participation

A. The DEIS Is Missing Extensive Information Precluding the Opportunity for Meaningful Public Comment

The DEIS fails to satisfy NEPA's basic requirements because it omits analysis of many key issues, stating that these analyses are forthcoming. This precludes meaningful public involvement and violates NEPA.

NEPA serves to protect the environment by ensuring "clarity and transparency" to federal decisions affecting the environment. *North Carolina Wildlife Fed'n v. North Carolina Dept. of Transp*, 677 F.3d 596, 603 (4th Cir. 2012). Public participation is a two-way street, serving to inform the public and to allow the public to "play a role in the decision-making process." *Id.* at 604–05. Enlisting the public serves to develop "high quality" information on "the issues that are truly significant to the action in question," and to guide agencies to "take actions that protect,

CO10-2 We disagree. The EIS discloses the potential impacts on environmental resources resulting from construction and operation of the Project. The EIS was prepared in accordance with NEPA, CEQ guidelines, and other applicable requirements. The EIS includes sufficient detail to enable the reader to understand and consider the issues raised by the Project and addresses a range of alternatives. The omissions cited in the comment (e.g., EFH assessment, wetlands mitigation details, etc.) are concurrent federal reviews being contemplated by federal resource agencies such as the NMFS, FWS, and COE. Although not finalized at the time of the draft EIS, the impacts associated with these reviews were disclosed for consideration.

restore, and enhance the environment." 40 C.F.R. §§ 1500.1, 1506.6 (public involvement), 1502.1 (purpose of impact statements). CO10-2 Cont'd

Public participation cannot serve these purposes unless "relevant information is … available to the public for comment." *North Carolina Wildlife Fed'n*, 677 F.3d at 604–05 (quotation omitted). NEPA therefore requires that a draft of EIS be provided for public comment, and this draft "must fulfill and satisfy to the fullest extent possible the requirements established for final statements." 40 C.F.R. § 1502.9(a). Under this requirement, agencies must "make available to the public high quality information, including accurate scientific analysis, expert agency comments and public scrutiny, before decisions are made and actions are taken." *Ctr. for Biological Diversity v. U.S. Forest Serv.*, 349 F.3d 1157, 1167 (9th Cir. 2003). The agency "should take to the public the full facts in its draft EIS and not change them after the comment period unless, of course, the project itself is changed." *Burkey v. Ellis*, 483 F. Supp. 897, 915 (N.D. Ala. 1979).

Here, FERC's decision to release the DEIS is premature, because analyses of numerous environmental issues are, by FERC's own admission, incomplete. Missing documents include analysis of:

- Essential Fish Habitat consultation with National Marine Fisheries Services
- Numerous reliability and safety analyses
- Analyses of impacts to endangered and threatened species,
- Details of proposed compensatory mitigation for wetlands

By circulating a DEIS without this information, FERC has violated NEPA's requirement that the DEIS satisfy the requirements of the final EIS to the fullest extent possible, and FERC has limited the public's ability to meaningfully review and comment.

B. FERC Has Not Provided Sufficient Opportunity for Public Comment CO10-3

FERC has further failed to provide the public with sufficient opportunity to weigh in on the DEIS. FERC set the public comment period at the regulatory minimum of 45 days. Much of this period—including the time preceding the in-person comment session—took place during the Christmas and New Year's holidays, when commenters' office were closed.

The format of the public comment sessions further frustrated meaningful public involvement. Rather than adopt a traditional public hearing, FERC's public comment sessions required individuals to speak one-on-one to a court reporter, isolated from their supporting community and in an intimidating environment.

Furthermore, FERC failed to provide information about the Project in Spanish, despite the fact that a large portion of the local impacted population is Spanish speaking, including individuals with limited English language proficiency. At a minimum, FERC should have provided interpreters and summary material in Spanish during the public comment session, even if FERC declined to translate the entire DEIS into Spanish. *See* Executive Order 13,166, 65 Fed. Reg. 50,121 (Aug. 16, 2000) (instructing "each Federal agency" to ensure that persons with limited English proficiency "can meaningfully access the agency's programs and activities"), 65 Fed. Reg. 50,123 (Aug. 16, 2000) (implementation guidance). CO10-4

II. The DEIS Does Not Demonstrate a Need for the Projects CO10-5

Neither Annova's application nor the DEIS provide any indication that Annova has contracts for the sale of LNG, or meaningful prospects for securing such contracts. As such, there is no evidence of a need for, or purpose served by, this project, and Annova's application should be denied.

Annova has not provided *any* evidence of demand for its proposed exports. The DEIS

CO10-3 The draft EIS comment period was consistent with the FERC's typical comment period of 45 days. While some information was pending at the issuance of the draft EIS, the public was not deprived of a meaningful opportunity to comment on substantial adverse environmental effects of the Project or a feasible way to mitigate or avoid such effects. The EIS includes sufficient detail to enable the reader to understand and consider the issues raised by the Project and addresses a reasonable range of alternatives.

CO10-4 A Spanish-speaking interpreter was provided during the public comment session on the DEIS.

CO10-5 See response to CO04-7. Under section 3 of the Natural Gas Act, oversight for LNG export is divided between the Commission and the U.S. Department of Energy (DOE). FERC is responsible for the siting of LNG facilities; however, it is the DOE, not the Commission, which retains the exclusive authority over the export of the natural gas as a commodity, including the responsibility to consider whether the exportation of that gas is in the public interest. As discussed in section 1.2.1.2, the DOE issued an order granting authorization to Annova to export LNG by vessel from the LNG terminal to free trade agreement countries.

provides *no* discussion of the need for the project or of market support for the proposed exports. This omission violates NEPA's requirement to address the purpose and need of the proposed project, and undermines the public and decisionmakers' ability to evaluate the project and potential alternatives (including, for example, alternatives that would provide less than the full proposed capacity). CO10-5 Cont'd

If Annova had information demonstrating purpose and need, Annova would be required to have provided this information both by NEPA and by the terms of Annova's DOE authorization to export to export gas to "Free Trade Agreement" countries. In seeking that authorization, Annova committed to filing "any relevant long-term commercial agreements (contracts)" concerning export of LNG from the proposed facility.[1] Annova must similarly file all contracts associated with long-term supply of gas.[2] These contracts must be filed "within 30 days of their execution."[3] To date, no filings indicating either type of contract appear on the DOE docket.[4] If Annova doesn't have anyone to sell gas to, or anyone to buy gas from, there is no need for the project. CO10-6

Annova has not provided evidence of need now, and the DEIS provides no reason to believe that Annova will be able to do so in the future. As of this writing, Annova has not sought authorization to export to non-free trade agreement countries.[5] Unless such authorization is requested and granted, Annova will only be permitted to export LNG to countries that have a free trade agreement with the United States that specifically requires national treatment of natural gas.[6]

[1] *Id.* at 7 (encompassing exports by Annova on its own behalf or by Annova as an agent for another party).
[2] *Id.*
[3] *Id.* at 9.
[4] https://www.energy.gov/fe/texas-lng-brownsville-lng-llc-fe-dkt-15-62-lng, last visited Dec. 13, 2018.
[5] https://fossil.energy.gov/ng_regulation/applications-2013-annovalngllcfedktno13-140-lng
[6] *See* https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2014/orders/ord3394.pdf at 4. The full list of countries that have such agreements is: Australia, Bahrain, Canada, Chile, Columbia,

CO10-6 See response to comment CO10-5.

Only four such countries import LNG, and of those four, only South Korea imports LNG in significant volumes.[7] However, South Korea is unlikely to increase its LNG imports beyond current levels,[8] making it an unlikely market for Annova's proposed exports. Moreover, while it appears that Annova is seeking long term contracts to justify investment in the new terminal, South Korean gas purchasers are transitioning away from such contracts, instead purchasing LNG on the spot market.[9] It is unclear how Annova could meaningfully participate in spot markets without non-FTA authorization Annova has not yet applied for. CO10-6 Cont'd

Because Annova has not applied for non-free trade agreement export authorization, the Department of Energy has not made any findings as to whether there is a market or other need for Annova's proposed exports. The Department's non-discretionary issuance of the Free Trade Agreement authorization does not provide any finding of purpose or need that FERC may rely on or defer to in evaluating whether there is a need for the proposed facility. CO10-7

Even if Annova were to apply for and receive Department of Energy authorization to export LNG to non-free trade agreement countries, Annova would still be unlikely to find buyers for its proposed exports. The Energy Information Administration provides estimates of global demand for U.S. LNG as part of the agency's Annual Energy Outlook. The most recent outlook forecasts that this demand will peak at 5.28 trillion cubic feet per year, or 14.5 billion cubic feet

Dominican Republic, El Salvador, Guatemala, Honduras, Jordan, Mexico, Morocco, Nicaragua, Oman, Panama, Peru, Republic of Korea, and Singapore.

[7] South Korea imports 13.2% of globally traded LNG. https://www.igu.org/sites/default/files/node-document-field_file/IGU_LNG_2018_0.pdf, at 11, attached as Exhibit 1. The other four importing countries are Mexico (1.7%), Chile (1.1%), Singapore (0.8%). *Id.* Insofar as Mexico is a market for US gas, this gas will almost certainly be delivered by pipeline, rather than as LNG.

[8] *Id* at 18.

[9] *Id.* at 16.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 8*

CO10-7 See response to comment CO10-5.

per day.[10] Other LNG export facilities that are already operational or under construction have capacity to saturate this demand. Together with proposed expansions, these facilities provide 15.35 bcf/d of capacity.[11] CO10-7 Cont'd

Commenters recognize that a private consultant, NERA Economic Consulting, hired by the Department of Energy to assess the macroeconomic impacts of U.S. LNG exports recently provided a much higher estimate of global demand.[12] As Sierra Club explained in comments on the NERA report, that report relied on numerous flawed assumptions that caused it to overstate global gas demand. Most severely, the report unrealistically and myopically assumed that, in the most likely scenario, no other nation takes *any* further action to limit greenhouse gas emissions.[13] This assumption runs counter to the rest of the world's affirmance of the Paris Climate Accords and commitment to take action on climate change. CO10-8

III. The DEIS's Alternatives Analysis Is Incomplete and Arbitrary CO10-9

The DEIS fails to take the required hard look at alternatives, because it both fails to consider some reasonable alternatives and because it fails to take a sufficiently hard look at some of the alternatives it does consider (including failing to support dismissal of some alternatives).

A. Analysis of Alternative Power Sources Likely Understates the Benefits of the Proposed Design CO10-11

Annova proposes to power its liquefaction trains with electricity provided by the ERCOT

[10] EIA, Annual Energy Outlook 2018 at 73, attached as Exhibit 2, available at https://www.eia.gov/outlooks/aeo/pdf/AEO2018.pdf; *see also id.* Table 13, attached as Exhibit 3, available at https://www.eia.gov/outlooks/aeo/excel/aeotab_13.xlsx.
[11] Approved facilities include Sabine Pass, Louisiana; Corpus Christi, Texas; Freeport, Texas; Cameron LNG, Louisiana, Dominion Cove Point, Maryland; and Southern LNG, Georgia. *See* https://ferc.gov/industries/gas/indus-act/lng/lng-approved.pdf?csrt=14475832695656449 27, attached as Exhibit 4.
[12] NERA Economic Consulting, Macroeconomic Outcomes of Market Determined Levels of U.S. LNG Exports (June 7, 2018), available at https://fossil.energy.gov/app/docketindex/docket/index/10
[13] *See id.* at 41-43.

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CO10-8 Comment noted. See response to comment CO10-5.

CO10-9 We disagree. See responses to specific alternatives comments below.

CO10-11 Comment noted. We have updated the analysis in the final EIS to include the grid-sources emissions using the EPA's AVERT model. See section 3.6.2.

grid. We agree that this alternative is likely to be environmentally preferable to the two alternative designs discussed in the DEIS: powering electrically driven compressor trains with a new, purpose-built combined cycle natural gas fired power plant (DEIS Part 3.6.1) or using compressors that are directly driven by on-site gas turbines (DEIS Part 3.6.2).[14] We also strongly support this DEIS's recognition of the need to address the indirect impact of purchasing electricity from the grid: generating this electricity will have foreseeable environmental consequences, principally in the form of increased emission of air pollution, that must be considered in the NEPA analysis.[15] Nonetheless, here, FERC should improve this analysis in two ways. CO10-11 Cont'd

First, FERC should explore the possibility of more sophisticated modeling of the impact of procuring the needed electricity from the grid, to better assess both the amount of additional emissions and where those emissions will occur. As EPA has explained, there are numerous methods that can be used to quantify the emissions associated with adding electricity demand, ranging from "basic to sophisticated."[16] The tool used in the DEIS here—EPA's Emissions & Generation Resource Integrated Database (eGRID)—is one of the most basic forms of analysis.[17] This is because eGRID identifies average emissions from the entire existing fleet. A more nuanced analysis can be performed with EPA's Avoided Emissions and Generation Tool

[14] We reiterate, however, that the existence of even worse alternatives does not mean that the proposed design will not have significant drawbacks or should be adopted.

[15] FERC could have and should have provided similar analyses for other LNG proposals, including the nearby Texas LNG and Rio Grande projects.

[16] https://www.epa.gov/sites/production/files/2017-06/documents/epas_new_tool_avert_webinar_0.pdf at 6, attached as Exhibit 5. Several other peer-reviewed papers have summarized different methods for assessing the impact of electricity consumption. *See* Nicole A. Ryan *et al.*, Comparative Assessment of Models and Methods To Calculate Grid Electricity Emissions, *Environ. Sci. Technol.* 2016, 50, 17, 8937-8953 (Aug. 8, 2016), 10.1021/acs.est.5b05216 (comparing available tools), attached as Exhibit 6; Nicole A. Ryan, *et al.*, Decision Support Algorithm for Evaluating Carbon Dioxide Emissions from Electricity Generation in the United States, Journal of Industrial Ecology (Nov. 2017), *available at* https://onlinelibrary.wiley.com/doi/epdf/10.1111/jiec.12708 and attached as Exhibit 7.

[17] https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid (last visited Dec. 13, 2018); *see also* EPA, *How to use eGRID for Carbon Footprinting Electricity Purchases in Greenhouse Gas Emission Inventories* (July 2012), available at https://www.epa.gov/sites/production/files/2015-01/documents/adiem.pdf (last accessed Dec. 13, 2018) and attached as Exhibit 8.

(AVERT), which can estimate air pollution impacts associated with adding *marginal* units of electricity demand in the Texas/ERCOT market.[18] Although AVERT was primarily developed to address the impact of electricity demand reduction, it can also "model scenarios with increases in load," such as imposition of the load contemplated here.[19] AVERT can provide quantitative estimates of the particulate matter (PM2.5), nitrogen oxides (NO_X), sulfur dioxide (SO_2), and carbon dioxide (CO_2) emissions impact of Annova's energy consumption. AVERT can also model *where* increased emissions will occur (because AVERT models dispatch of individual generating units), providing a more sophisticated analysis than the DEIS's general assertion that the emissions associated with electricity production would be distributed throughout the ERCOT region.

CO10-11 Cont'd

Even AVERT, however, cannot provide analysis of the expected life of the Annova project. AVERT is designed to address the near-term (*e.g.*, five years). The Department of Energy has authorized Annova to export gas to free trade agreement countries for a 30-year term.[20] AVERT does not reflect how ERCOT's generation mix is likely to change over the next three decades, or how it would change in response to the load that would be created by the Annova project: in particular, the grid is likely to increase adoption of renewables, and thus, indirect emissions associated with supplying Annova with electricity are likely to decrease over time. Thus, while AVERT and eGRID may provide useful starting points for analysis, more

[18] https://www.epa.gov/statelocalenergy/avoided-emissions-and-generation-tool-avert, attached as Exhibit 9.
[19] EPA, AVERT User Manual Version 2.1 at 28 (Oct. 2018), available at https://www.epa.gov/sites/production/files/2018-10/documents/avert_user_manual_10-05-18_508_0.pdf and attached as Exhibit 10. *See also* North Carolina Department of Environmental Quality and South Carolina Energy Office, Electric vehicles and air quality (Dec. 2016), https://www.advancedenergy.org/wp-content/uploads/2016/12/EV_to_Air-Quality-003.pdf, attached as Exhibit 11 (government report using AVERT to model emissions impact of added electricity generation needed to support increased electric vehicle usage).
[20] https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2014/orders/ord3394.pdf

sophisticated, project-specific energy modeling may be warranted here, which could address these issues. Going forward, FERC should consult with the technical experts at EPA, a cooperating agency, to identify the most effective way to take the required hard look at the impacts of the proposed project's substantial electricity consumption. CO10-11 Cont'd

Second, in addition to providing more sophisticated modeling, consideration of indirect impacts needs to be extended throughout the DEIS, rather than limited to the comparison of design alternatives. The indirect impacts must factor not only into the decision of whether to require an alternative design, but also into the decision of whether to approve the facility at all, or to require a reduction in facility size. Here, the DEIS ignores the impacts of Annova's electricity consumption when describing the proposal's environmental consequences, including cumulative impacts. This omission is especially inappropriate because indirect emissions associated with electricity generation are likely to be *far* greater than direct emissions. *Compare* DEIS 3-19 *with* DEIS 4-174. The DEIS concludes that the impact of direct and nearby indirect air emissions would be insignificant, but it provides no discussion of whether the far greater emission increases that would be associated with additional electricity production would be significant, or how those increases would impact the communities surrounding the powerplants at issue. CO10-12

B. The DEIS Must Consider Alternative Designs that Would Reduce or Divide the Facility's Footprint CO10-13

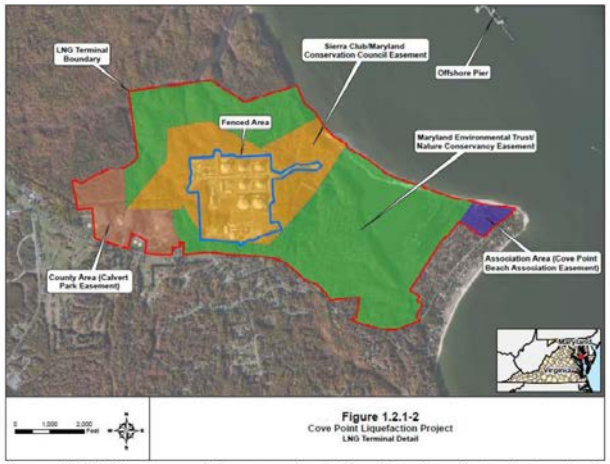
The proposed facility, as designed, will occupy 364 acres once constructed, with additional acres occupied by roads and other facilities. DEIS 2-9. Reducing or reconfiguring this footprint could allow alternatives that would reduce environmental impacts, including impacts on wetlands and sensitive species. Several such alternatives are reasonable, but are ignored by the DEIS.

CO10-12 It is beyond the scope of the EIS to address indirect effects from the production of the electricity that would be used by the Project.

CO10-13 During the pre-filing process Annova modified the proposed site layout to reduce the area of shoreline impact, including to avoid impact on mangrove wetlands. As shown on figure 1-2 of the EIS, most of the shoreline impact would be associated with the marine facilities that require a direct connection to the marine waterway. We do not agree that it is necessary to evaluate an alternative design that would move gas pre-treatment, liquefaction, and LNG storage facilities farther from the shoreline.

As Sierra Club explained in its protest of Annova's FERC application,[21] one alternative would be to move some of the proposed facilities away from the proposed site. Although marine facilities must generally be placed near a shipping channel, gas pretreatment and liquefaction are separate processes. *See* DEIS 2-1 to 2-4.[22] Other LNG facilities have demonstrated that these components need not all be located at the same site. The Freeport, Texas project separated pretreatment facilities from the remainder of the project by a five-mile pipeline. *Freeport LNG Development*, 148 FERC ¶ 61,076 P22 (July 30, 2014). The Cove Point, Maryland project, which was constructed as an import facility more than 40 years ago, separates marine transfer facilities from gas storage and liquefaction facilities by more a mile, connected by a pipeline that transports natural gas in liquid form. FERC, *Environmental Assessment for the Cove Point Liquefaction Project*, Docket CP13-113, at 2 (May 2014).[23] The following figure illustrates the Cove Point site configuration. Notably, onshore facilities are set back from the shoreline. CO10-13

[21] FERC Accession No. 20160817-5441.
[22] *Accord* Resource Report 1-7, Accession No. 20160713-4004 (July 13, 2016) (describing the proposal as having two "principal parts:" LNG facilities" and "marine transfer projects.").
[23] Available at http://elibrary.ferc.gov/IDMWS/common/ OpenNat.asp?fileID=13546236.



Source: FERC, Environmental Assessment for the Cove Point Liquefaction Project, Docket CP13-113 (May 2014).

CO10-13 Cont'd

Another option for reducing the footprint at the proposed site would simply be to build a facility with a smaller capacity. Annova proposes to build six liquefaction trains in three stages, but could simply omit the second or third stage. As explained above, Annova has not demonstrated *any* need for the project; by extension, Annova has not demonstrated a need for a project of exactly this scale. NEPA requires consideration of alternatives that do not perfectly satisfy the applicant's goals: put differently, the purpose of the project cannot be defined so narrowly as to preclude consideration of reasonable alternatives. Here, FERC must consider whether alternatives that impose a smaller footprint could deliver an outsize reduction in environmental harm. For example, a 33% reduction in overall facility size may eliminate far more than 33% of the wetland impacts.

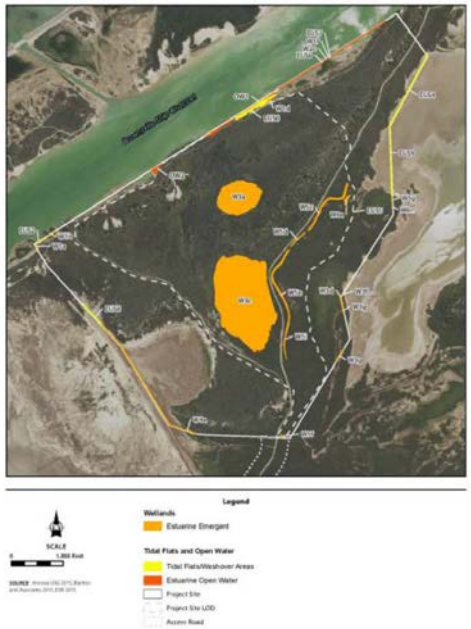
CO10-14

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 14*

CO10-14 The Commission evaluates projects as proposed, and reasonable alternatives to those projects. It is important to note that the Commission's role under the NGA is to review applications filed with it, not to develop alternative plans for energy infrastructure that would deviate from the project's stated purpose. Thus, alternatives such as building a facility with a smaller design capacity and output as suggested in this comment are not evaluated in the EIS,

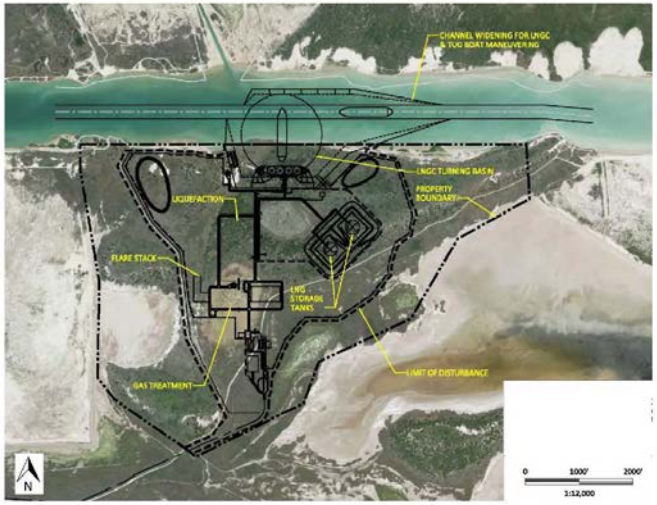
Thus, reducing the footprint at the proposed site, whether by separating pretreatment (or pretreatment and liquefaction) facilities from marine loading facilities or by simply reducing the scale of the project, could enable Annova to reduce impacts on wetlands and/or wildlife. CO10-14 Cont'd

For example, much of Annova's wetland impacts will be caused by pretreatment and storage, rather than marine transfer, facilities. Annova predicts that the project will permanently disturb 40 acres of wetlands, primarily "estaurine emergent". DEIS 4-29 to 4-300. The majority of these wetlands are at the terminal site, as shown in DEIS figures 4.4.2-1 reproduced below.



The proposed Annova facility design would fill these wetlands, as illustrated by DEIS figure 1-2, reproduced below (note the change in orientation):

CO10-14 Cont'd



In the proposed design, wetlands will be impacted by gas pretreatment facilities (which the Freeport project demonstrates can be located at a site miles away) and by liquefaction equipment (which Cove Point demonstrates can be a mile from marine loading facilities). NEPA requires that FERC take a hard look at alternatives that would follow the approaches used at Freeport or Cove Point to relocate these facilities and thereby reduce wetland impacts. Similarly, NEPA further requires a hard look at the extent to which a smaller facility, with fewer liquefaction trains, could reduce these impacts.

IV. The Annova LNG DEIS Fails to Adequately Assess Impacts on Local Communities

CO10-15

A. Introduction

The National Environmental Policy Act (NEPA) requires an environmental impact assessment (EIS) to examine all potential impacts of a project, including "ecological . . . aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative."[24] Agencies must consider the environmental justice impacts of their actions on low-income, minority communities in accordance with Executive Order 12898.[25] The socioeconomic costs of a project related to physical environmental impacts, including reductions in property values, must also be analyzed. These analyses include examining "purely economic" impacts—for example, the loss of businesses in the project area—and effects that branch from racial insensitivity or economic inequality.[26] The analysis must also consider problems related to the displacement or relocation of people.[27]

Below, we highlight the shortcomings and inconsistencies of the DEIS's treatment of the adverse environmental justice, socioeconomic, and fisheries impacts of the Annova Project. In terms of environmental justice impacts, we first demonstrate that the Annova Project primarily and disproportionately affects low-income, minority communities. Then, we illustrate how the DEIS fails to consider impacts to Cameron County's public health and safety, nearby residential property values, and increased vehicular traffic.

In terms of socioeconomic impacts, we first illustrate why the DEIS's economic analysis regarding the LNG Terminal and Pipeline Systems proposals does not adequately consider its economic impact. This includes showing why claims that the Project will increase jobs fail to

[24] 40 C.F.R. § 1508.8.
[25] *Coliseum Square, Inc. v. Jackson*, 465 F.3d 215, 232 (5th Cir. 2006).
[26] *Coliseum Square*, 465 F.3d at 234.
[27] *Coliseum Square*, 465 F.3d at 232.

CO10-15 The EIS evaluates impacts on local communities. See sections 4.9 and 4.8. See also responses to further specific comments below.

account for the shocks the projects will create on the local economy, and why the estimated annual impact of the Project fails to account for a number of adverse impacts. Second, we show how the environmental degradation caused by the Projects will adversely impact local industries, including tourism, recreational fishing and commercial fishing.

B. The DEIS Fails to Adequately Consider the Environmental Justice Impacts of the A LNG Project

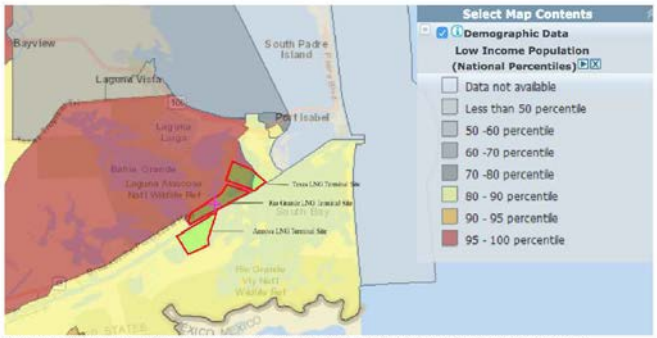
CO10-16

1. The Annova LNG Project Primarily Impacts Low-Income, Minority Communities

The neighborhoods in the area affected by the Annova LNG project are majority-minority and low-income communities.[28] Cameron County is a majority-minority county, with non-White people making up 91.1% of the population.[29] As one of the Annova LNG Resource Reports acknowledges, the Project would be located in an area where "unemployment [is] high" and the average wage per job is low compared with the state unemployment and wage averages.[30] 87.5% of students served by the Port Isabel Independent School District (Port Isabel ISD) are economically disadvantaged, and 37.8% of students in Port Isabel ISD schools are English Language Learners.[31]

[28] DEIS 4-134-36.
[29] "QuickFacts: Cameron County, Texas," United States Census Bureau, accessed November 13, 2018, attached as Exhibit 12.
[30] Annova LNG Project, Resource Report 5: Socioeconomics, RR 5-9.
[31] 2016 – 2017 Texas Academic Performance Report: Port Isabel ISD, attached as Exhibit 13, available at https://rptsvr1.tea.texas.gov/cgi/sas/broker?_service=marykay&year4=2017&year2=17&_debug=0&single=N&title=2017+Texas+Academic+Performance+Reports&_program=perfrept.perfmast.sas&prgopt=2017%2Ftapr%2Ftapr.sas&ptype=P&level=district&search=district&namenum=isabel&district=031909, accessed November 20, 2018.

CO10-16 We disagree. Environmental justice impacts are adequately addressed in the EIS. See section 4.9.9.



Terminal Site Demographics: Low Income Population (Source: EJScreen mapping tool)

CO10-16

2. The DEIS Fails to Consider Impacts to Public Health and Safety

CO10-17

Annova LNG estimates that construction of the project would generate an estimated $192 million in state and local taxes, with approximately 60% of this total paid directly by Annova.[32]

The DEIS states that project construction would spur a "short-term increase in population" in areas near the project. Over the 48-month construction period, the DEIS estimates the project will employ an average of 700 workers on site. A total of 1,200 workers would be employed during peak construction, approximately a 6 month period starting "mid-way through the second year." Very few of the non-local workers employed during the construction phase of the Project are expected to permanently relocate, or even be accompanied by their families. An average of 253 non-local workers (36%) will perform specialized jobs on the project, while the remaining 447 workers (64%) are expected to be local hires from Cameron County and, to a lesser extent, Willacy County. During peak construction, up to 780 non-local workers (65% of peak workforce

[32] DEIS 4-128.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 19*

CO10-17 We disagree. Potential impacts on public health and safety are adequately addressed in sever sections of the EIS. See section 4.9.8 (Public Services), 4.9.9.2 (Disproportionate Human Health or Environmental Effects), 4.11 (Air Quality and Noise), and 4.12 (Reliability and Safety). Cumulative impacts on public health and safety from construction and operation of the Annova LNG project combined with other proposed projects, including LNG projects, is addressed in sections 4.13.3.7, 4.13.3.9, and 4.13.3.10.

estimates) may temporarily relocate to the region. The potential impacts on the regional population, according to the DEIS, should be minor. Lastly, operation and maintenance of the project is expected to require 165 personnel, 110 of which will be filled by non-local workers who would permanently relocate to the area. This, they claim, will also not have a noticeable effect on the area.

CO10-17 Cont'd

The DEIS nevertheless fails to adequately document how these temporary and permanent increases in population expected from the temporary construction jobs and permanent operations jobs may financially strain the area's public services, especially if you consider these increases concurrently with the other two LNG projects. The DEIS claims that the minor increase of area residents during the construction phases of the Annova LNG project would not have an adverse impacts on local public services.[33] This is an oversimplification of the strain the project – and its resulting uptick in environmental degradation, especially when considered concurrently with the other two LNG projects being proposed near the site – will impose on health care services. For instance, the DEIS acknowledges that the construction phases of the Project will "impact local air quality,"[34] as do the concurrent LNG Terminal and Pipeline projects. Simple coordination with "local law enforcement, fire departments, and emergency medical services" for "effective emergency response" does little to abate these concerns.[35]

Even minor damage to the area's air quality, for instance, must be considered in conjunction with the existing environmental conditions of Cameron County. The County already ranks 227 out of 242 counties in Texas for its poor air quality, water quality, and other

[33] *See* DEIS, 4-132.
[34] DEIS, 4-171.
[35] DEIS, 4-132.

environmental metrics.[36] Cumulative impacts from the Annova LNG project, multiple pipelines, multiple terminals, and supporting industries, *e.g.*, freight, could exponentially increase environmentally-influenced health issues. One example is that air pollution can worsen symptoms of respiratory diseases like asthma.[37] Any uptick in health issues like these could, in turn, also significantly increase the demand for medical services. The DEIS fails to provide adequate analysis on whether the increase in pollutants is likely to increase health problems and the demand they place on hospitals' capacity to take in patients. CO10-17 cont'd

Not only does the DEIS lack any serious analysis on whether a decrease in air quality might lead to an increase in demand for medical services, such as asthma treatments, but it does not adequately address disasters. In the event of a disaster requiring evacuation or causing trauma and hospitalization – either during the construction or operation/maintenance phases of the Annova LNG project – Port Isabel residents would be required to travel to one of Brownsville's two medical centers with trauma centers, since Port Isabel and Laguna Madre have no hospitals.[38] There is no analysis on whether these trauma centers can handle such a disaster. Further, in the event of a disaster requiring evacuation, there is no analysis on routes that residents closest to the Project will be able to take to reach safety or medical services. The most direct route to Brownsville and its medical services passes directly adjacent to the proposed facility. CO10-18

If a scenario such as this one plays out during the construction and/or operation phases of the Project, communities closest to the Project would have to travel to medical facilities in Brownsville in case of health emergencies. The lack of public financial resources caused by the

[36] "Cameron County: County Health Rankings," from County Health Rankings & Roadmaps, attached as Exhibit 14, available at http://www.countyhealthrankings.org/app/texas/2018/rankings/cameron/county/factors/overall/snapshot.
[37] Asthma and Allergy Foundation of America, *Asthma Capitals 2018: The Most Challenging Places to Live With Asthma*, (2018), p. 18, attached as Exhibit 15, available at http://www.aafa.org/media/2119/aafa-2018-asthma-capitals-report.pdf.
[38] DEIS, 4-132.

CO10 continued, page 21 of 113

CO10-18 As stated in the EIS (section 4.12.5.8) Annova submitted a draft emergency response plan (ERP) to address emergency events and potential release scenarios in its application with FERC. The ERP would include public notification, protection, and evacuation. FERC staff evaluated the initial draft of the emergency response procedures to assure that it covers the hazards associated with the Project. In addition, we recommend in section 4.12.6 that Annova provide additional information, for review and approval, on development of updated emergency response plans prior to initial site preparation. We also recommend in section 4.12.6 that Annova file three dimensional drawings, for review and approval, that demonstrate there is a sufficient number of access and egress locations. If this project is authorized and constructed, Annova would coordinate with local, state, and federal agencies on the development of an emergency response plan and cost sharing plan. We recommend in section 4.12.6 that Annova provide periodic updates on the development of these plans for review and approval, and ensure they are in place prior to introduction of hazardous fluids. In addition, we recommend in section 4.12.6 that project facilities be subject to regular inspections throughout the life of the facility and would continue to require Annova to file updates to the ERP, as necessary.

increased population of the Annova project in tandem with the other LNG projects may, in turn, create strain for Brownsville medical facilities that may not be equipped to handle increased foot traffic. It may also prevent the construction of new facilities in Port Isabel and/or Laguna Madre if health needs become acute, since tax increases may still not be enough to handle the cumulative increases in population. Not to mention, political choices regarding how to prioritize those dollars may not be moved towards increased health care accessibility. CO10-18 Cont'd

The DEIS also fails to acknowledge Annova LNG's impact on local public schools. The DEIS acknowledges that if all of the estimated non-local workers that move into the area during the operation phase of the project – approximately 110 non-local workers in total – have 1.3 school-aged children on average, then approximately 144 additional students would enroll in area public schools – a 0.3% increase of the student population in the Brownsville ISD, and 0.1% of total enrollment in Cameron County.[39] When looked at individually, the impact on teacher-student ratios is minimal. However, this estimate does not take into account the strain that an increase of the student population may have in tandem with the other LNG projects coming to the area, of course, which would change teacher-student ratios for the worse. Not to mention, with tax abatements given to another LNG project, this view also fails to acknowledge the strain on school occupancy limitations, meaning that concurrent influxes of school-aged children into area public schools could lead to fewer dollars per student invested. This is also a property-poor area, meaning that investments in schools from property taxes are already low. As a result, any increase in students could have a disproportionately large negative impact, given the higher marginal utility of tax dollars in school districts such as the Brownsville and Point Isabel Independent School Districts in comparison to richer districts. A potential strain on school funding is CO10-19

[39] DEIS, 4-133.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 22*

CO10-19 We disagree. The potential impact of the Annova Project on public schools is acknowledged in section 4.9.8.3. The cumulative impact of the Annova Project with other area projects, including other proposed LNG projects, is addressed in section 4.13.3.7.

particularly problematic because Laguna Heights schools are within the PISD, and given the high poverty rates in Laguna Heights, any impact to educational opportunities could further cement income inequality throughout Cameron County.[40] CO10-19 Cont'd

3. The DEIS Fails to Adequately Consider Impacts to Nearby Residential Property Values CO10-20

The DEIS failed to adequately consider impacts to property values. The DEIS states only that "the nearest residences [to the Annova LNG project are] located approximately 2.7 miles to the south."[41] As such, the DEIS states simply that development of the Annova facility is "not expected" to impact the value of residential properties or ongoing developments, which are all situated beyond 2 miles from the project.[42]

Unfortunately, the DEIS does not provide any further analysis on the impact the Project will have on neighboring communities. Truthfully, since the LNG market is young, economic studies on the effects of large-scale, industrial LNG projects on nearby property values are scant. However, comparable studies have been conducted for decades regarding the effects of other high-polluting, loud and visually unappealing industrial projects on nearby property values. For example, a University of California - Berkeley study found that home values within two miles of power plants opened up in the U.S. in the 1990s decreased by three to seven percent by the mid-2000s, largely due to disamenities such as how visually unappealing large industrial projects are, as well as the noise they generate.[43] In addition, power plant openings are correlated with

[40] Nathan Grawe, *Education and Economic Mobility*, The Urban Institute (Apr. 3, 2008), p. 18, attached as Exhibit 16, available at https://www.urban.org/sites/default/files/publication/31161/1001157-education-and-economic-mobility.pdf (demonstrating that while research is in its early stages, improved K-12 school quality increases economic mobility).
[41] DEIS, 4-127.
[42] *Id.*
[43] Lucas W. Davis, *The Effect of Power Plants on local Housing Values and Rents*, The Review of Economics and Statistics 93: 4, 1391–1402, 1392, attached as Exhibit 17, available at

CO10-20 We disagree. Section 4.9.3 of the EIS addresses the potential impact of the Project on property values of the nearest residences. Section 4.9.3 includes the statement "Industrial and similar developments have been found to affect property values within an approximate 2-mile radius (Yellow Wood Associates 2004)" and goes on to evaluate potential Project-specific impacts.

significant decreases in mean household incomes and educational attainment in areas near the plants, and the proportion of homes that are owner-occupied decreased by two to five percentage points as well.[44] This is because people with incomes in the middle class or near-middle class range choose to live near industrial projects like power plants, and thus only households with lower incomes – which is correlated with lower educational attainment – live in the area, often because it is either less expensive or because it is too expensive to move.[45] CO10-20 Cont'd

While the homes nearest to the Annova LNG project are approximately 2.3 miles away in the Port Isabel area, the power plants analyzed in the UC Berkeley Paper were also in areas with low population density like the proposed site in question. This means that a slight increase in distance from the LNG terminal can still possibly lose some of its value, unlike slight distances in more dense areas, where property values can vary more significantly on a block by block basis. Also, the concentration of lower household incomes and educational attainment levels can help further stratify regional poverty[46] in an area that has struggled for decades to lift itself up economically. In sum, the DEIS's lack of in-depth analysis of property values demonstrates a failure to adequately consider socioeconomic impacts.

4. The DEIS Fails to Adequately Consider Impacts to Vehicular Traffic in its Vicinity CO10-21

During construction, there will be a large increase in vehicular traffic, particularly on SH-48. The DEIS acknowledges that traffic will increase on SH-48 during construction, citing the

http://realneo.us/system/files/PowerplantValueImpact.pdf.
[44] *Id.*
[45] *Id.* at 1392, 1401-05.
[46] Jay Shambaugh and Ryan Nunn (ed.), *Place-Based Policies for Shared Economic Growth*, The Hamilton Project at the Brookings Institute, 1–250, 7–9 (2018). Attached as Exhibit 18 and available at http://www.hamiltonproject.org/assets/files/THP_PBP_fullbook_web_20190129.pdf.

CO10-21 The results of the traffic impact analysis prepared for the Project (Traffic Impact Group 2015) are summarized in section 4.9.10.1. As noted in the comment, the analysis assumes that staggered shifts would be employed during construction to reduce potential impacts on roadway traffic.

Contrary to the summary provided in the comment, the traffic impact analysis does not assume that workers would be transported to and from the construction site from a centralized location via passenger buses. The traffic impact analysis is based on workers commuting to and from the site (with an assumed 20 percent carpool rate). Proposed mitigation for the four intersections that would likely be impacted are summarized in table 4.9.10-3. However, as noted in the EIS, Annova has proposed bussing, and, if that were to occur, it would reduce the potential impacts identified in the traffic impact analysis and described in section 4.9.10.1. Contrary to the summary provided in the comment, the Project would not add large commuter traffic flows to SH 48, which is located across the BSC from the Project site. Primary site access would be via SH 4. SH 48 from Port Isabel was identified as a potential truck route, but the traffic impact study identified two other routes as the recommended routes (see section 4.9.10.1, Heavy Trucks subsection). Therefore, the Project is not expected to affect the ability of Port Isabel and Laguna Heights residents to travel along SH 48 to and from Brownsville.

Potential traffic-related impacts on tourists are discussed in section 4.9.10.1, Tourism and Recreation subsection.

results of Annova LNG's Traffic Impact Analysis.[47] Annova LNG's Traffic Impact Analysis assumes that construction shifts will be staggered, with half the workforce (500 vehicles) arriving and departing during peak hours. In other words, the Traffic Impact Analysis recommends that half of the employees (500 trips) work from 6:30 a.m. to 5:00 p.m., while the remaining 500 trips working from 7:30 a.m. to 6:00 p/m.[48] Even with mitigation, however, the traffic flows will be negatively impacted with a significant increase in delays during morning and evening peak travel times, especially when considering that just Annova's construction phase alone – without even taking into account the construction phases of the other two LNG projects – will bring in more average daily commuters onto SH-48 than there were in 2015.[49] CO10-21

While the Traffic Impact Analysis recommends several measures to mitigate the increased traffic on the SH-48 intersections that will be impacted the most, *e.g.*, constructing and operating new lanes, the DEIS relies Annova LNG's proposal to transport construction workers to and from the construction site from a centralized location of via passenger buses, , assuming this will be an effective tool to curb vehicular traffic impacts.

There is no indication of what incentives construction workers may have, however, to travel to this centralized location, which is still to be determined, in order to catch a passenger bus. This is especially pressing if construction workers are expected to drive to the centralized location in order to do so. It is difficult, then, to understand why enough construction workers would rather drive to the centralized location instead of simply driving to the construction site directly. Since the DEIS relies on Annova's proposed passenger bus to assuage increased commuter traffic, it does not even bother considering the effect that this increased traffic and

[47] DEIS at 4-139 – 4-143.
[48] *Id.* at 4–140. .
[49] *Id.*

resulting change in traffic patterns will have on the low-income minority communities closest to the Project. Large increases in traffic along SH-48 will impact the ability of residents to reach their workplaces or medical services in Brownsville in a timely manner. The visitation patterns of tourists may also change based on this increased in traffic, but the DEIS also fails to consider how the pattern might change and how such changes might impact businesses and residents in Port Isabel and Laguna Heights. CO10-21

C. The DEIS Fails to Adequately Consider the Socioeconomic Impacts of the Annova LNG Project CO10-22

1. Claims that the Project Will Increase Jobs and Create Positive In-flows into the Local Economy Fail to Fully Account for the Shocks to the Economy Created by the Construction Phases of the Project

Construction of the LNG Terminal would require an average of 700 on-site workers per month, with a peak of 1,200 personnel during the height of the construction phase, which will span about 48 months.[50] On average, 253 non-local workers, or 36%, are predicted to be employed to perform specialized construction jobs, while the remaining 447 workers, or 64% are expected to be local hires from Cameron County. During peak construction, up to 780 non-local workers, or 65% of the total labor force, may temporarily locate to the region.[51] About $3 billion will be spent to construct the project, an estimated $1.5 billion of which would be spent on construction of the project and share infrastructure with Texas, with the remaining $1.5 billion "spent elsewhere."[52] An estimated $130 million will be spend on construction materials, with materials such as concrete, sand, gravel/rock, lumber, erosion and sediment control devices, personal protective equipment, welding consumables and other miscellaneous items purchased

[50] DEIS, 2-9.
[51] *Id.* at 2-9, 4-121.
[52] *Id.* at 4-122.

CO10-22 The economic impact analysis cited in this comment was, as noted in the draft EIS, prepared by Ernst & Young (2015) on behalf of Annova. Separate impact analyses were conducted for the state and Cameron County (see table 4.9.2-2 in the EIS). Direct employment related to on-site construction was provided by Exelon management and only those direct jobs expected to be filled by Texas and Cameron County residents, respectively, are included in table 4.9.2-2. Indirect impacts were estimated based on the shares of Project-related expenditures expected to occur in-state and in Cameron County, respectively, also using information provided by Exelon. This approach does not count positions filled by non-local workers as direct benefits to the modeled regions (the state and Cameron County), and, while details are not provided by Ernst & Young (2015), this type of modeling is designed to capture only those secondary (indirect and induced) impacts that occur in the modeled region. In other words, although specific details of the modeling approach are not provided, it is reasonable to assume that the analysis accounted for the impacts of the non-local workforce in an appropriate manner.

With respect to the potential for incoming workers to "significantly change the character of the area" due to their "different cultures and lifestyles," as discussed in section 4.9.1, an average of 253 non-local workers are expected to be employed for the construction phase of the Project, peaking with total employment of up to 780 non-local workers. These potential temporary increases in population would be equivalent to about 0.1 percent and 0.2 percent of the existing population in Cameron County and unlikely to significantly alter local character or existing patterns of economic activity. Finally, the comment expresses concern that once Project construction is complete, the decrease in demand for Project-related goods and services and reduction in local expenditures by non-local workers could result in a disproportionately large shock to the local economy, resulting in business displacement and increased unemployment. Project construction would provide substantial investment in the local economy, as indicated by the Ernst & Young (2015) study, and provide opportunities for local workers and businesses, some of which could last up to four years. As construction nears completion, it is anticipated that workers will seek new opportunities and businesses will adjust their outputs and production forecasts accordingly. The newspaper article cited in the comment found that while the Enid area experienced a large decline in gross domestic product, consistent with large construction projects coming to an end, the overall economy remained strong (Wilmoth 2018).

Reference: Wilmoth, B. 2018. Enid's economy slows as construction projects are completed. The Oklohoman. September 20. Website: https://newsok.com/article/5608887/enids-economy-slows-as-construction-projects-are-completed? Accessed on March 18, 2019.

locally.[53] Annova LNG also estimates it would add a total of $688.2 million to the local Cameron County economy, and $3.0 billion in associated economic output, during the 48-month construction period. The operation and maintenance phase of the project, which will require 165 permanent personnel, would generate approximately $17.3 million in annual labor income in Cameron County, with an estimated salary per worker of $105,000.[54] Out of these 165 workers, 110 of them will be non-local workers that relocate to the area.[55] Annova also claims that the operations and maintenance phase will support 446 total jobs in Cameron County, $30.8 million in total labor income, and $522 million in economic output.[56] CO10-23

The logic of the DEIS is shortsighted. Increased employment and expenditures are often the source of an influx of consumer activity of economy. As demands for goods and services and the spending of disposable income by workers at local businesses increases, economic advantages should, in theory, trickle down. Surely, it is possible, if not likely, that the local economy of the areas surrounding the projects will react positively, resulting in a temporary stimulus to the existing housing industry, and existing retail, educational, and healthcare services in the area, at least during the construction period.

However, the rollercoaster effect created by two separate shocks to the local economy – the introduction of the construction project and the completion of the project – may produce serious complications, especially when considered concurrently with the similar shocks produced by other LNG projects being proposed in the area. With a large influx of temporary employees, any per capita growth in gross domestic product is diluted, and thus there is not as much of a boon to the local economy as the gross numbers make it seem. In this sense, economic activity that

[53] *Id.*
[54] *Id.* at 4–121.
[55] *Id.*
[56] *Id.*

CO10-23 See response to previous comment CO10-22.

arises to meet the demand of the large influx of employees hired from out-of-state for the project may not significantly increase the area's per capita income or standards of living. Second, a large influx of foreign workers should make a serious impact in the kinds of entrepreneurial activity that develops to accommodate growing demand for, say, retail. These non-local workers bring with them different cultures and lifestyles, which will likely be reflected in the markets that emerge to accommodate their presence, and thus may significantly change the character of the area.

CO10-23 Cont'd

These problems are magnified when considering the Annova LNG developer's estimated tally for its final, permanent workforce. Unfortunately, the Annova LNG developers estimate a need for only about 165 permanent jobs for operating the facilities once the construction phases are complete. Since LNG exportation is not a local feeder industry, any entrepreneurial activity that developed to absorb the disposable income of employees in the area during the construction phase of Annova and its LNG neighbor projects may suddenly face a lack of demand, causing local markets, *e.g.*, retail and entertainment markets that thrive on disposable income, to shrink. Furthermore, local contractors relying on the project, *e.g.*, assisting with secondary manufacturing needs, transportation, and possibly even utilities, could all be impacted by a disproportionately large shock to a local economy that lacks the absorbing power and industrial diversity of a large, metropolitan urban economy. This could result in displacement and increased unemployment, to start with. There is some evidence of similar effects from other regions of the country. As large energy construction projects wrap up, the regional gross domestic product of less urban, less economically diverse areas may decrease significantly. For example, in a 2018 study released by the federal Bureau of Economic Analysis, Enid, Oklahoma's GDP dropped 7.8% after large energy-related construction projects came to an end – the largest decline in gross domestic

product in 2017 among the country's 383 metropolitan areas.[57] CO10-23 Cont'd

2. The Estimated Annual Economic Impact of the Projects Fails to Account for the Adverse Impacts of High-Paid, Skilled Workers on Low-Income Areas, Social Costs Incurred by Neighboring Communities, and Market Volatility CO10-24

As mentioned above, Annova LNG anticipates a 165-person operational staff for the LNG Terminal that would result in an annual payroll of $17.3 million. However, first, permanent employees' salaries will average $105,000 annually. While 165 employees would make a relatively small dent if diluted within the workforce of a large metropolitan area, with relatively few residential areas in the vicinity of the project, these salaries could significantly influence local consumer preferences. For instance, such high salaries in Cameron County, a county with an average salary of under $15,000, could pressure small businesses to either cater to more moneyed patrons, or succumb to competition from businesses that are more willing to operate in the lifestyle markets that interest the new local consumer base. Furthermore, for existing businesses, rents can increase because of increased residential and consumer demand in an area. If a business's revenue does not increase, then operating costs could become unsustainable and force businesses to shutter their doors. And of course, if Annova LNG employees remain concentrated in a given area, *e.g.*, Port Isabel or Laguna Heights, then residential property prices could rise in the given area in response to the demand from a wealthier population. This increases the probability of displacement due to either the increased property taxes after the area is re-appraised, or increased rents.

Next, the projects impose social costs on current area-residents as well. These future, CO10-25

[57] Adam Wilmoth, "Enid's economy slows as construction projects are completed, NewsOK (Sept. 20, 2018), attached as Exhibit 19, available at https://newsok.com/article/5608887/enids-economy-slows-as-construction-projects-are-complete.

CO10-24 As noted in the comment, operation and maintenance of the Project would require 165 personnel, with an estimated average salary per worker of $105,000, including benefits (Ernst & Young 2015). Spending by these relatively highly paid workers would support other economic activity in the local economy, along with Project-related operations and maintenance spending. The civilian labor force in Cameron County in 2014 consisted of about 168,000 workers (table 4.9.2-1). The addition of 165 well-paid jobs is not expected to result in substantial changes to patterns of local economic activity. As noted in section 4.9.6, Annova anticipates that approximately 110 of these positions would be filled by non-local workers who would permanently relocate to the area. The relocation of approximately 110 workers and their families to the Project area is not expected to affect the supply of regional housing resources.

CO10-25 The addition of approximately 110 workers to the Cameron County area, is equivalent to about 0.03 percent of total county population in 2014 (table 4.9.1-1) and unlikely to have a noticeable effect on community cohesiveness.

richer Annova LNG employees – especially if they're from out-of-town or out-of-state – could further any changes in the character of communities that began during the influx of foreign workers brought about by the construction phases of the project. This contributes to the disintegration of community cohesiveness and identity, and could have the effect of reducing civic engagement and increasing mental health issues among residents facing displacement.[58] CO10-25 Cont'd

Lastly, and more broadly, the LNG market is young and volatile, meaning that the estimated economic impact to the region (and the country) needs to be analyzed more profoundly. First, some industry sources forecast a supply gap, with forecasted demand exceeding supply. These industry sources are often concerned with filling the supply gap by increasing U.S. production.[59] Second, other industry sources are concerned with the seasonality of the LNG market.[60] Historically, total demand for LNG varies seasonally, while supply is usually flat. This imposes high costs of storage on LNG exporters, which in turn causes volatility. This means LNG prices change in accordance with this temporal mismatch. Note, however, if the U.S. becomes the largest LNG seller by 2025, as some industry sources predict, then it is unclear how the increased competition in LNG exporting will affect Annova LNG's projected economic impact.[61] Third, another factor that can impact LNG prices in the U.S. is the projected increase in price of gas for CO10-26

[58] Zukin, Sharon, Valerie Trujillo, Peter Frase, Danielle Jackson, Tim Recuber, and Abraham Walker, *New Retail Capital and Neighborhood Change: Boutiques and Gentrification in New York City,* City and Community 8:1, 47-64, attached as Exhibit 20.
[59] Stacey Morris, "U.S. LNG Exports Part 1: Capacity Jumping in 2019, But Will There Be Enough?" SeekingAlpha.com (Jul. 11, 2018), attached as Exhibit 21, available at https://seekingalpha.com/article/4186550-u-s-lng-exports-part-1-capacity-jumping-2019-will-enough?page=2.
[60] Shell LNG Outlook 2018, p. 24, attached as Exhibit 22, available at https://www.shell.com/energy-and-innovation/natural-gas/liquefied-natural-gas-lng/lng-outlook/_jcr_content/par/textimage_864093748.stream/1519645795451/d44f97e4d4c4b8542875204a19c0b21297786b22a900ef8c644d07d74a2f6eae/shell-lng-outlook-2018-presentation-slides.pdf. Sylvie Cornot-Gandolphe, New and Emerging LNG Markets: The Demand Shock (June 2018), p. 40, attached as Exhibit 23, available at https://www.ifri.org/sites/default/files/atoms/files/cornotgandolphe_new_emerging_lng_markets_2018.pdf.
[61] Jude Clemente, *Qatar As Major Competition For U.S. Liquified Natural Gas*, Forbes (Nov. 11, 2018), attached as Exhibit 24, available at https://www.forbes.com/sites/judeclemente/2018/11/07/qatar-as-major-competition-for-u-s-liquefied-natural-gas/#51824b3678ae.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 30*

CO10-26 The comment requests that the economic impact analysis presented in the EIS take into account what it terms the "market volatility of LNG" and, more specifically, the effects of competition from other LNG terminal facilities given uncertainty regarding the supply of natural gas likely to be available for export. The economic impact analysis summarized in the EIS (Ernst & Young 2015) assumes that the Annova facility would operate as proposed, with Project-related employment and expenditures supporting secondary (indirect and induced) economic activity elsewhere in Texas and Cameron County. Modeling the effects of competition and price changes is outside the scope of this analysis, but any reductions in Project-related local employment and spending would have commensurate effects on estimated secondary (indirect and induced) impacts.

consumers as more natural gas is exported. While consumers can react to the price impact of LNG exports as long as LNG exports can be anticipated, it is extremely difficult to predict the amount of exports that can be shipped out of any given terminal, since there is considerable debate among engineers regarding how much can be produced out of each shale gas basin.[62] In other words, the economic impact projected by the DEIS should take the market volatility of LNG into account if it hopes to be responsible. CO10-26 Cont'd

D. The DEIS Does Not Adequately Consider How the Environmental Degradation Caused by the Projects Will Likely Adversely Impact Local Industries CO10-27

1. The DEIS Does Not Adequately Consider Adverse Impacts to Tourism

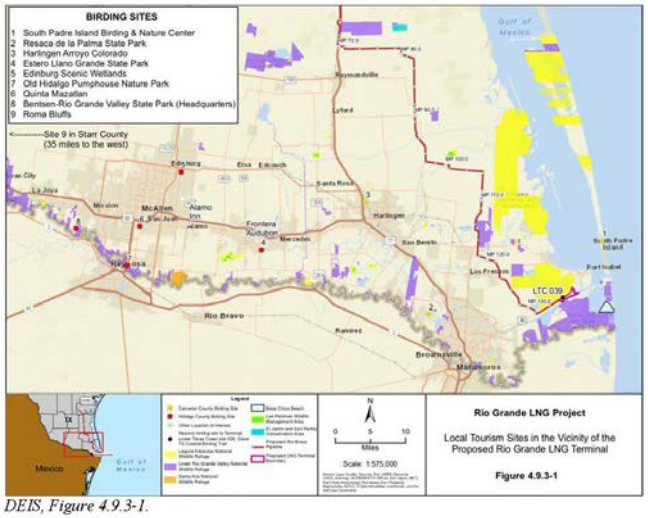
a) Industry Overview

The Annova LNG project, along with two other major LNG export terminals, will increase air pollution, large vessel traffic, and noise to an area where tourism—especially nature-oriented tourism like bird watching and fishing—is a major source of employment and income. Many low-income residents are employed in jobs related to the hospitality industry serving the areas tourists. Adverse impacts of the area's ability to draw nature-oriented tourists would significantly affect this population.

[62] The Deloitte Center for Energy Solutions, *Made In America: The economic impact of LNG exports from the United States*, Deloitte Insights (Jan. 25, 2013), attached as Exhibit 25, available at https://www2.deloitte.com/insights/us/en/industry/oil-and-gas/made-in-america-the-economic-impact-of-lng-exports-from-the-united-states.html.

CO10-27 The comment states that the draft EIS concluded that the Project would not affect regional tourism patterns or the overall level of visitation to the region "with relatively little evidentiary support." Construction and operation of the Project would result in site-specific impacts on recreation and visitor use during construction and operation, as discussed in section 4.9.2.2 of the EIS. These site-specific impacts are not expected to affect overall regional tourism patterns, but could result in localized impacts, with visitors and other recreationists seeking similar opportunities nearby or elsewhere in the region. Project-related impacts on recreation and tourism are discussed in more detail in section 4.8.4 of the EIS.

CO10-27



DEIS, Figure 4.9.3-1.

The Rio Grande Valley is one of the top bird watching destinations in the country.[63] "Texas is the number one birdwatching state/province in North America, and the Texas Rio Grande Valley is often considered the number two birdwatching destination in North America. The four counties of the Valley—Hidalgo, Starr, Willacy, and Cameron—together have recorded almost 500 bird species—more than all but four states."[64] Ecotourism brought $25.4 billion to the state, based on estimates from the Texas Comptroller's office.[65] Ecotourism in the Rio Grande Valley brings in "between $100 million and $170 million annually and employs *several thousand*

[63] *See* DEIS, Figure 4.9.3-1 reproduced above.
[64] Mathis & Matisoff, Houston Advanced Research Center, *A Characterization of Ecotourism in the Texas Lower Rio Grande Valley* (March 2004), p. 1, attached as Exhibit 26.
[65] *Id.* at 14.

people."[66] The proposed terminal site is sandwiched between two National Wildlife Refuges that are less than 0.25 miles from the project site.[67] CO10-27 Cont'd

Designated Birding Sites Part of the Great Texas Birding Trail (Source: Texas Parks and Wildlife)[68]

There are many designated birding sites near the terminal site, including the South Padre Island Birding & Nature Center and locations on the Great Texas Birding Trail.[69] In addition to the designated spots, there are innumerable unofficial birding sites within the parks and nature reserves. Part of what makes the area a unique birding site and major tourist attraction is its position within the Central Flyway. A major migratory route, over 380 species travel along the

[66] *Id.* at 17. (emphasis added).
[67] *See* DEIS, 4-70.
[68] Attached as Exhibit 27, available at https://tpwd.texas.gov/huntwild/wildlife/wildlife-trails/ltc.
[69] *See* DEIS, 4-206.

CO10-28 See response to comment CO10-27.

Central Flyway.[70] The area surrounding the proposed terminal project is where birds make first landfall after crossing the Gulf of Mexico.[71] The Laguna Atascosa National Wildlife Refuge, immediately adjacent to the proposed terminal site, was established in 1929 to serve as a sanctuary for migratory birds.[72] Habitat destruction, like the construction of a major pipeline and LNG terminal, is a rising threat to migratory birds.[73] CO10-27 Cont'd

In addition, South Padre Island draws $370 million each year to Cameron County and "approximately $266 million to Brownsville, Port Isabel/Laguna Vista, and Los Fresnos."[74] For Port Isabel and Laguna Vista, nearly 36% of their employment is related to economic activity on South Padre Island.[75] Recreational fishing in the Lower Laguna Madre System contributed an estimated 479 jobs and $45.3 million in the sales of goods and services.[76]

b) The DEIS Inadequately Considers the Adverse Impacts to the Tourism Industry CO10-28

The DEIS acknowledges few potential impacts on the tourism industry. First, the DEIS admits that dust, increased traffic, noise and visual impacts will affect some tourists and residents using recreational sites in the project area, but claims it will implement measures to mitigate these effects.[77]There will be permanent changes to the area's landscape, including visually prominent

[70] "Central Americas Flyway: Fact Sheet," Bird Life International, attached as Exhibit 28, available at http://datazone.birdlife.org/userfiles/file/sowb/flyways/2_Central_Americas_Factsheet.pdf.
[71] Tim Harris, "RSPB Migration Hotspots: The World's Best Bird Migration Sites," 2013, p. 48, attached as Exhibit 29.
[72] *Id.*
[73] Paul A. Johnsgard, "Wings Over the Great Plains: Bird Migrations in the Central Flyway," (2012), p. 21, attached as Exhibit 30.
[74] South Padre Island Economic Development Corporation, "Economic Impact of South Padre Island," p. 3, attached as Exhibit 31, available at http://southpadreislandedc.com/sites/default/files/files/Resources%20%26%20Studies/SPI%20Economic%20Impact%20Analysis%20Summary.pdf.
[75] *Id.* at 2.
[76] Andrew Ropicki et al., "The Economic Impacts of Recreational Fishing in the Lower Laguna Madre Bay System," Nov. 9, 2016, p. 2, attached as Exhibit 32, available at http://texasseagrant.org/assets/uploads/resources/16-512_The_Economic_Impacts_of_Recreational_Fishing_in_the_Lower_Laguna_Madre_Bay_System.pdf.
[77] DEIS, 4-93.

features of the proposed facilities, which will affect the character and quality of the natural landscape.[78] Viewer sensitivity ishigh throughout the area, "due to the large number of people traveling in the area for recreation and leisure."[79] Also, the DEIS concedes that any uptick in hotel accommodations needed for temporary workers throughout the area is unlikely to displace tourists, and that existing hotel accommodations should be more than enough to accommodate the uptick in temporary employees.[80] The DEIS also predicts that any visual impacts to visitors of South Padre Island will be minimal, and will unlikely affect visitors to Schlitterbahn Waterpark and Resort, Isla Blanca Beach, and the Boy Scout camp – three of the South Padre attractions closest to the project site.[81] Unfortunately, this treatment admits to affecting nature tourism, but discards its motivations, which are steeped in admiration for nature that either is, or is perceived to be, undisturbed. Despite admitting to how the project will affect the visual of the area's touristic attractions, the DEIS posits that the project will not significantly affect the gross number of tourists that visit the area with relatively little evidentiary support.[82] The DEIS also does little to keep in mind that there will likely be two concurrent LNG projects in construction at the time that Annova is in its own construction phase, thus further limiting hotel accommodations for tourists.

CO10-28 Cont'd

Even a relatively minor impact to the tourism industry can result in huge repercussions for the region. A 2011 Texas A&M University study on nature tourism in the Rio Grande Valley documented a $344 million dollar economic benefit.[83] Further, based on data from the Bureau of

[78] *Id.* at 4–102.
[79] *Id.* at 4–103.
[80] *Id.* at 4-131.
[81] *Id.* at 4-99 – 4-100.
[82] Id. at 4–124.
[83] Kyle M. Woosman, Rebekka M. Dudensing, Dan Hanselka, Seonhee An, "An Initial Examination of the Economic Impact of Nature Tourism on the Rio Grande Valley." Texas A&M Univ. 1 Sept 2011, attached as Exhibit 33.

Labor Statistics, there are 671 tourism businesses and 12,296 tourism jobs in Cameron County.[84] And due to its pristine beaches and clean water, South Padre Island draws about a million overnight visitors yearly, adding an estimated $370 million to the Valley's economy in 2011 alone.[85] Thus, even a small dent in economic impact could result in tens of millions of dollars of lost revenues for the region, which is especially harmful in the case of South Padre Island, where tourism is by far the dominant industry. In addition, a decrease in economic impact from the tourism industry can translate to an uptick in unemployment. Even if the number of jobs created by the LNG projects would be enough to supplant the loss of tourism industry jobs, much of the jobs created by the projects will be staffed by out-of-towners and/or by workers with specific skills. This could exclude workers that may have lost their jobs as a result of any damage to the tourism industry. These workers may also reside in low income areas, such as Laguna Heights, which in turn magnifies the impact of the project on low income, minority communities. Lastly, tourism workers may not have the skills to staff the influx of incoming, construction-related jobs. CO10-28 Cont'd

A further risk is whether the presence of Annova and the other two proposed major LNG export terminals, as well as other industrial projects, will discourage future investment in the area that would be consistent with the tourism industry or, conversely, attract more high polluting projects. Quality of life and recreational activities are important factors that companies consider when choosing where to invest in office operations.[86] The project area has a natural, comparative CO10-29

[84] *See* Shawn Stokes and Marcy Lowe, "Wildlife Tourism and the Gulf Coast Economy," Jul. 9, 2013, p. 8, attached as Exhibit 34, available at https://www.mmc.gov/wp-content/uploads/Stokes-and-Lowe-2013-Wildlife-Tourism-and-the-Gulf-Report_FINAL.pdf.

[85] "Economic Impact of South Padre Island," South Padre Island Economic Development Corporation, 2012, attached as Exhibit 31, available at http://southpadreislandedc.com/sites/default/files/files/Resources%20%26%20Studies/SPI%20Economic%20Impact%20Analysis%20Summary.pdf.

[86] *See* Parks and Recreation's Role in Economic Development," The George Mason University Center for Regional Analysis, May 2018, attached as Exhibit 35, available at https://www.nrpa.org/siteassets/nrpa-economic-development-report.pdf.

CO10-29 The EIS does not assess the potential for the proposed LNG terminal to discourage future investment in recreation and tourism-related businesses or other activities that seek proximity to recreational opportunities or scenic resources. Similarly, the analysis does not consider the potential for the proposed LNG terminal to attract other more industrial uses to the area. This type of analysis would be speculative at best, as many factors influence business and household location decisions, and the likelihood that the LNG terminal alone would attract new, unrelated industrial activities is believed to be low.

advantage to other communities because of its low cost of living, many recreational opportunities, and unique natural beauty. The project area will lose that comparative advantage if it instead caters to high polluting industries that degrade the qualities that make it an attractive place to vacation or make a home. CO10-29 Cont'd

Furthermore, a study from the University of Indiana shows that high concentrations of certain industries tend to attract investment in the same industries.[87] Industries tend to cluster to take advantages of benefits of proximity to related industries and infrastructure.[88] The DEIS fails to consider that this project and others will attract similar investments in other high polluting projects to the detriment of the local population.

2. The DEIS Fails to Adequately Analyze the Project's Impact on the Recreational Fishing Industry CO10-30

The DEIS fails to seriously acknowledge that the LNG Terminal will have adverse impacts on recreational fishing.[89] The DEIS acknowledges that construction may temporarily affect access to recreational fishing and boating activities along the Brownsville Ship Channel.[90] Access to some destinations may be delayed as well due to "dredging activities and the movement of barges delivering large equipment" to the project's offloading facility.[91] During operation, LNG carriers navigating to and from the project site may impact recreational anglers who transit creational fishing boats through the BSC, causing delays and possible temporary relocations due to safety reasons while an LNG carrier is navigating to or from the marine berth at the project

[87] Timothy Slaper and Ping Zheng, "Why Invest There?", Center for International Business Education and Research, Sept. 2018, attached as Exhibit 36, available at http://www.ibrc.indiana.edu/studies/why-invest-there-2018.pdf.
[88] *Id.*
[89] *See* DEIS, 4-108 – 4-112.
[90] *Id.* at 4-101.
[91] *Id.*

CO10-30 The cited text accurately discloses the anticipated direct effects of Project construction and operation on the recreation and tourism sector. Cumulative effects are assessed in section 4.13 of the EIS.

site.[92] The increase in traffic – from an average of 2 to 6 vesssels per month, or about 80 LNG carriers per year – would be added onto the Port of Brownsville 312 vessel-a-year average, without even counting the impacts from the other LNG projects.[93] These weekly trips cause delays for fishing vessels that are not allowed to cross paths with the LNG carriers, averaging from a few minutes to 1.5 hours on some occasions.[94]

CO10-30 Cont'd

This treatment leaves much to be desired. First, the DEIS fails to provide in-depth consideration of the cumulative impacts the multiple projects will have on recreational fishing. For example, there is no analysis on the cumulative impact of the LNG carriers servicing the LNG Terminals will have on traffic in the BSC. The cumulative impact is downplayed as temporary, short-term, and minor due to the presence of other recreational opportunities nearby.[95] While the LNG carriers servicing the Texas LNG terminal may just be 80 a year, the total number of LNG Carriers for all three proposed LNG terminals is 512.[96] This impact will not be temporary or short-term, since it will continue so long as the terminals are operating. And yet, other than minimizing the effect of the project on recreational fishing opportunities, the DEIS does not provide any analysis supporting their finding that there will be no significant impact on recreational fishing.

In addition, by failing to acknowledge the interdependent nature of recreational fishing and the tourism industry, the DEIS fails to adequately address the impact the project will have on each industry separately. The Brownsville Economic Development Council describes recreational

[92] *Id.*
[93] *Id.*
[94] *Id.*
[95] *See* DEIS, 4-112 – 4-113.
[96] *See* Rio Grande LNG DEIS, 4-401.

fishing as "a major attraction for locals and tourists."[97] Recreational fishing is a significant portion of wildlife tourism in Texas, accounting for 29% of wildlife tourists.[98] In 2011, 7,769,000 people participated in wildlife activities in Texas, and 2,253,010 of those people participated in recreational fishing.[99] Recreational fishing in the Lower Laguna Madre System alone contributed an estimated 479 jobs and $45.3 million in the sales of goods and services.[100] CO10-30

By failing to consider the adverse impacts recreational fishing will have on the tourism industry, the DEIS fails to adequately consider the adverse impact the project will have on the local economy. This lack of nuance dilutes the impact on both tourism and recreational fishing by failing to consider simultaneous adverse effects the project may have on both industries, thus minimizing the impact of the project generally.

3. The DEIS Does Not Adequately Consider the Adverse Impacts to the Commercial Fishing and Shrimping Industries, Including Impacts to Aquatic Species and Essential Fish Habitat, and Does Not Propose Meaningful Mitigation for These Impacts CO10-31

a) Industry Overview

The DEIS fails to adequately consider impacts to area residents who shrimp and fish for their livelihood and to others who rely on the local fishing and shrimping industry for their livings. It also fails to include adequate mitigation for the harms to this vitally important industry. Between 2009 and 2014, Cameron County accounted for 31% of the Texas shrimp harvest.[101]

[97] *See* Brownsville Economic Development Council website, attached as Exhibit 37, available at http://www.bedc.com/sports-recreation.
[98] *See* Shawn Stokes and Marcy Lowe, "Wildlife Tourism and the Gulf Coast Economy," Jul. 9, 2013, p. 8, attached as Exhibit 34, available at https://www.mmc.gov/wp-content/uploads/Stokes-and-Lowe-2013-Wildlife-Tourism-and-the-Gulf-Report_FINAL.pdf.
[99] *See id.*
[100] Andrew Ropicki et al., "The Economic Impacts of Recreational Fishing in the Lower Laguna Madre Bay System," Nov. 9, 2016, p. 2, attached as Exhibit 32, available at http://texasseagrant.org/assets/uploads/resources/16-512_The_Economic_Impacts_of_Recreational_Fishing_in_the_Lower_Laguna_Madre_Bay_System.pdf.
[101] *See* Andrew Ropicki et al., "Economic Impacts of the Cameron County Shrimp Industry," Jun. 2016, attached as Exhibit 38, available at http://cameron.agrilife.org/files/2015/06/Cameron-County-Shrimp-Industry-Economic-

CO10-31 Potential impacts on commercial fishing are discussed in section 4.9.2.3 of the EIS. Specific concerns raised by the commenter with respect to EFH are discussed in response to comments CO10-32 to CO10-38.

Including processing facilities, the shrimping industry has a $145 million impact per year on Cameron County.[102] With 178 shrimping vessels, shrimping is a significant part of the local economy.[103] Currently, there are 106 permits for Gulf Royal Red Shrimp issued to Texas shrimpers. Thirty-five of those permits were issued to people in Port Isabel, and 45 of those permits were issued to people in Brownsville.[104] There are 542 permits for Gulf of Mexico Shrimp issued to Texas shrimpers. Seventy-one of those permits were issued to people in Port Isabel, and 84 of those permits were issued to people in Brownsville.[105] CO10-31

The Annova LNG terminal would be located between the Bay and the Brownsville Fishing Harbor, where numerous shrimping trawlers and fishing boats are docked. As the DEIS acknowledges, "[m]ost local Gulf-shrimping vessels dock at the Port of Brownsville Shrimp Basin"[106] and the Port of Brownsville and the Port Isabel together ranked as the second largest commercial fishing port by value along the Gulf of Mexico.[107]

b) Impacts on Essential Fish Habitat CO10-32

FERC concludes in the DEIS and attached EFH Assessment (Appendix F) that the construction of the Annova LNG Terminal would result in "short-term and highly localized" impacts, and that any loss of fish species "would be inconsequential to regional fish

Impacts.pdf.

[102] *See id*; *see also* Rod Santa Ana, "Experts: Shrimp imports depress market prices and pose health risks," AgriLife Today, Aug. 27, 2015, attached as Exhibit 39, available at https://today.agrilife.org/2015/08/27/shrimp-imports-depress-market-prices/.

[103] Tony Reisinger and Andrew Ropicki, Ph.D., *2016 Cameron County Shrimp Industry Best Management Practices Outreach*, "Extension Education in Cameron County: Making a Difference," (2016), p. 40, attached as Exhibit 40, available at http://counties.agrilife.org/cameron/files/2011/04/2016-Making-a-Difference-Cameron-County.pdf.

[104] National Oceanic and Atmospheric Administration, Gulf Royal Red Shrimp Permit Records, attached as Exhibit 41, available at https://portal.southeast.fisheries.noaa.gov/reports/foia/GRRS.htm (accessed Nov. 20, 2018).

[105] National Oceanic and Atmospheric Administration, Gulf of Mexico Shrimp Permit Records, attached as Exhibit 42, available at https://portal.southeast.fisheries.noaa.gov/reports/foia/SPGM.htm (accessed Nov. 20, 2018).

[106] DEIS, 4-147; 4-126.

[107] DEIS, 4-126.

CO10-32 In its comments on the Essential Fish Habitat Assessment included in the draft EIS (see comment FA01-1), the National Marine Fisheries Service stated that it has reviewed the information provided and concurs that the impacts would be temporary and minor. Therefore, NMFS has no Conservation Recommendations to provide on this project, and this concludes the EFH consultation requirements of the Magnuson-Stevens Fishery Conservation and Management Act and no further consultation with NMFS is required.

populations."[108] However, the DEIS does not provide an opportunity for meaningful review of FERC's Required EFH Assessment with NMFS. FERC does include a Proposed EFH Assessment in Appendix F of the DEIS, however, the next crucial steps in the EFH process – the EFH Conservation Recommendations by NMFS and FERC's response to those recommendations – have not occurred yet, and thus will not be available during the public comment period for the public to review and provide feedback. For example, FERC states that "NMFS may provide recommendations to FERC regarding further measures that can be taken to conserve EFH. We would respond to any such recommendations." Thus, the public does not have a meaningful opportunity to review possible future analysis and recommendations to conserve EFH. CO10-32 Cont'd

In this initial step of the EFH consultation in the DEIS, FERC has not adequately considered or provided mitigation for the demonstrated harmful impacts of other LNG facilities on fisheries. Several National Oceanic and Atmospheric Administration (NOAA) documents demonstrate the high level of concern about the impacts of LNG facilities on fisheries in the Gulf of Mexico, but none of these impacts were considered as part of FERC's DEIS. First, in a 2017 Report from the National Essential Fish Habitat Summit, LNG was identified as one of three "emerging issues" in the Southwest Region:[109] CO10-33

> "In many Gulf of Mexico LNG facilities, seawater is used to reheat liquid natural gas and is then discharged back into the ocean at about 20°C cooler than the ambient temperature. There was a time lag between the development of LNG facilities and the assessment of the potential effects of the discharge of cooled waters on fish stocks, but studies now show that about five billion fish eggs and larvae are killed per facility due to this cooled discharged water."

Here, the DEIS states that "water used for engine cooling would be discharged at a

[108] DEIS Vol. II, F-32.
[109] NOAA Technical Memorandum NMFS-OHC-3, August 2017, attached as Exhibit 43, available at https://spo.nmfs.noaa.gov/sites/default/files/TM-OHC3.pdf.

CO10-33 See response to comment CO10-32.

temperature between 2.7F and 7.2F warmer than the ambient water temperature," but then without citing any studies or other evidence, concludes that the impacts from these discharges would be "short-term and minor."[110] CO10-33 Cont'd

In addition, the Gulf of Mexico Fishery Management Council concluded in 2005:[111]

> "Facilities that require substantial intake and discharge of water, especially heated and chemically-treated discharge water, are generally not suited for construction and operation in estuarine and near-shore marine environments. …
>
> There is also concern over the potential impacts of proposed Liquid Natural Gas (LNG) flowthrough processing facilities in waters of the Gulf of Mexico. These facilities take in large volumes of water to warm LNG. For example, the Port Pelican Liquid Natural Gas (LNG) processing facility is proposed for coastal Louisiana in 25 m (83 ft) of water. During Phase II of its operation, it is projected to take in 176.4 million gallons of seawater per day or 64.4 billion gallons per year. The water will be used to warm the LNG and will undergo a temperature decrease of 11° C (20° F). The intake rate will be around 15 cm/sec (0.5 ft/sec), allowing most larger organisms to avoid impingement at the intake structures, but water passing through the facility will undergo mechanical, pressure, temperature, and chemical (NaOCl) shock. Some entrained eggs and larvae may survive any one of these adverse conditions (Cada et al. 1981, Muessig et al. 1988), but the combination of these stresses will be lethal to almost all organisms passing through the facility.
>
> There is a special concern regarding the siting of flow-through facilities in or near estuarine passes. Most fishery organisms in the Gulf of Mexico use estuaries as nursery grounds, and eggs and larvae recruit into these areas through tidal passes. Locating facilities in or near these tidal passes will be especially damaging to fishery resources, since eggs and larvae of fishery species are often concentrated in these areas. Locating LNG facilities in shallow water also increases the proportional area of impact. Based on an

[110] DEIS 4-56, 57.

[111] Gulf of Mexico Fishery Management Council, NOAA, "Generic Amendment Number 3 for Addressing Essential Fish Habitat Requirements, Habitat Areas of Particular Concern, and Adverse Effects of Fishing in the following Fishery Management Plans of the Gulf of Mexico," March 2005, attached as Exhibit 44, available at https://gulfcouncil.org/wp-content/uploads/March-2005-FINAL3-EFH-Amendment.pdf

assessment of LNG facilities, the NOAA Fisheries Southeast Fisheries Science Center recommended that flow-through LNG systems in the Gulf of Mexico should be avoided in favor of closed loop systems. The negative impacts to fishery species and living marine resources in the Gulf from a single flow-through facility could be potentially severe, and cumulative impacts from multiple facilities were considered a threat to fishery resources." CO10-33

The DEIS estimates that the Annova LNG facility *alone* (not counting the other two proposed LNG facilities) would "affect" (*i.e.* kill) "between 872,000 and 1.8 million larval fish and 152,000 and 328,000 larval shrimp per year by cooling water intake."[112] However, despite these sizable mortality numbers and the concerns listed in the report above, the DEIS states that the impacts on ichthyoplankton from cooling water intake would be "permanent" but "not significant."[113] The analysis is inadequate to make this conclusion because it assumes without analysis that due to "high natural mortality rates in the first year of ichthyoplankton," the additional loss from the LNG facility would "not significantly impact the health of the adult fish population."[114] No studies are cited or other analysis to support this conclusion. In addition, when combined with the impacts on fish species from the other two proposed LNG terminals, this does not satisfy the agency's requirement of taking the requisite "hard look" at impacts to aquatic species and fisheries, including cumulative impacts. CO10-34

The only mitigation proposed for impacts to fisheries and EFH is the Applicant's Section 404 permit and noise mitigation from the construction of pilings.[115] Additional mitigation should be included to minimize impacts to fisheries from a wider variety of impacts, as discussed above. CO10-35

Another major concern to the region's fisheries that FERC has not adequately evaluated in the DEIS is the potential for exotic species introductions from ballast water. FERC's analysis of CO10-36

[112] DEIS 4-56.
[113] DEIS 4-56.
[114] DEIS 4-56.
[115] DEIS Vol. II, F-30 – F-32.

CO10 continued, page 43 of 113

CO10-34 As stated in the EIS Cumulative Impacts section (section 4.13.3.4), withdrawal of cooling water by LNG carriers at the three terminals would have direct effects on ichthyoplankton. However, combined, engine cooling water withdrawal by LNG carriers for all three projects would have a minor impact on ichthyoplankton within the BSC. The EIS correctly identifies that there is likely not higher densities of ichthyoplankton in cooling water used by LNG vessels than in other parts of the BSC. Because a significant percentage of the water in the BSC would not be used, then a significant percentage of the ichthyoplankton stock would also not be affected. The estimate of ichthyoplankton mortality was included as part of the analysis in the EFH assessment (see section 4.0 and 4.2.1.5 of the EFH Assessment in appendix F of the EIS). See response to comment CO10-32 for the NMFS response to this analysis.

CO10-35 Based on review of the EFH Assessment by the NMFS no mitigation is required to minimize impacts on fisheries. See response to comment CO10-32.

CO10-36 The EIS assesses the potential for invasive species introductions via ballast water in sections 4.3.2.2 and 4.6.2.2; however, the final EIS has been updated to include additional information regarding the efficacy and timeline for these measures.

the potential risks is inadequate because 1) it presumes that because "the makeup of native aquatic species within the BSC has likely been altered over the years"[116] by operation of ships in the Port of Brownsville that new additional ballast water exchange from LNG vessels wouldn't have an additional impact on fisheries and native species, and 2) it presumes that Coast Guard and EPA regulations will "minimize and avoid impacts on marine resources" without evaluating any evidence of the efficacy and timeline of these new regulations generally or in particular for the sensitivity of local conditions in the Brownsville area to non-native species, where there are important fisheries, unique ecosystems, and other aquatic life.[117] CO10-36 Cont'd

For example, a 2017 study entitled "Potential effects of LNG trade shift on transfer of ballast water and biota by ships" warned of potential "large effects" on the transfer of non-native species from the growing LNG exports from the US even with the existing US regulations:

> "Moreover, compliance schedules are based on vessel capacity and construction date, so ships with large ballast water capacity (N5000 m3), such as LNG carriers, have more lag time to meet US regulations. Thus, the massive surge in overseas ballast water predicted by the US LNG export boom could increase propagule supply and invasion risk… even as management efforts seek to reduce organism concentrations…. These changes in magnitude, source, and direction of the LNG trade can have large effects on transfer of nonnative organisms, due to the volume and biotic content of associated ballast discharge to ports."[118]

In the DEIS, FERC has not given the requisite "hard look" to these potential "large effects" on fisheries, unique ecosystems, and aquatic resources from the threat of non-native species. CO10-37

[116] DEIS 4-55.
[117] *See* Mendoza, R. et al, "Aquatic Invasive Species in the Rio Bravo/Laguna Madre Ecological Region," Commisison for Environmental Cooperation, Canada (October 2011), attached as Exhibit 45, available at http://www3.cec.org/islandora/en/item/10259-aquatic-invasive-species-in-rio-bravolaguna-madre-ecological-region-en.pdf
[118] Holzer et al, Potential effects of LNG trade shift on transfer of ballast water and biota by ships, *Science of the Total Environment*, 580 (2017) 1470–1474, attached as Exhibit 46, available at https://www.researchgate.net/publication/311936667_Potential_effects_of_LNG_trade_shift_on_transfer_of_ballast_water_and_biota_by_ships#pf5

CO10-37 See response to Comments CO10-35 and 37.

Furthermore, the DEIS fails to adequately address the cumulative impacts on EFH and fisheries from the three proposed LNG facilities combined as well as other projects impacting the Brownsville Ship Channel. FERC determines that cumulative impacts on water quality are anticipated to be "minor" and "negligible" as a result of cooling water exchanges and ballast water, respectively, because the impacts from each facility are "localized."[119] FERC also determines that withdrawal of cooling water from all three facilities "would have direct effects on ichthyoplankton" but then concludes these effects would only have a combined "minor impact."[120] However, there are no studies or analysis cited as to why the impacts would remain localized or minor, if, for example, non-native species were introduced or large amounts of fish eggs and larvae were killed from entrainment from all three proposed facilities. FERC also concludes that cumulative impacts on aquatic resources as result of dredging activities would be "short-term" but "could result in adverse effects" and does not address cumulative impacts on EFH.[121] As commentators stated above and in comments on the RG LNG DEIS and Texas LNG DEIS, the EFH Assessments have not been completed and reviewed by NOAA yet, and therefore, we do not know the full impact from each facility nor the combined impacts and the public does not have a meaningful chance to review impacts to EFH. Local fisheries will bear the brunt of potentially three new proposed LNG facilities, and the impacts from all of these projects combined must be more comprehensively evaluated. CO10-38

c) Impacts on Fishing Vessel Travel in the Ship Channel CO10-39

The DEIS determines that dredging activities alone would displace shrimpers who trawl in the BSC for "approximately 175 working days" and that 2-6 LNG carriers per month (up to 80

[119] DEIS, 4-275.
[120] DEIS 4-282.
[121] DEIS, 4-282.

CO10 continued, page 45 of 113

CO10-38 We maintain that the EIS adequately addresses cumulative impacts on EFH and fisheries. See also NOAA Fisheries comment on the Annova Project EFH Assessment in comment FA01-01.

CO10-39 The final EIS has been updated to account for the potential maximum of up to 125 LNG carriers per year visiting the Annova Project. Potential impact on the commercial fishing, including the BSC-based shrimping industry is include in section 4.9.2.3 of the EIS. However, based on this comment and similar comments received on the draft EIS, on March 15, 2019, we requested that Annova provide additional information regarding potential impacts on the Brownsville-based shrimp industry from proposed LNG vessels transiting the BSC, and have updated the final EIS as appropriate. See also Annova's response to our EIR on the FERC docket in accession number 20190325-5179.

visits per year) would cause delays to shrimping activities and traffic in the BSC.[122] FERC acknowledges that "the three LNG projects would result in an increase in ship traffic by about 722 vessels per year within the BSC during construction and 467 vessels per year during operation"[123] and that the cumulative impact of these vessel trips "would represent a substantial increase" in vessels in the BSC, which would cause delays for small vessels and boaters, "ranging from 11 to 32 percent of daylight hours per year."[124] The cumulative impact of these lengthy and/or frequent delays in access to the ship channel due to LNG traffic could be both costly and life-threatening to the fishing industry – impacts that FERC either does not acknowledge in the DEIS. Commercial fishing boats are often out for extended periods of time, and then return at unexpected times with thousands of pounds of frozen shrimp or fish. Boats may also return early due to illness, injuries, or mechanical problems and need to get to shore quickly. Time is an important resource that is a huge variable in the fishing industry, and thus being forced to wait extended periods of time for LNG traffic could endanger lives and financially harm the fishing industry. CO10-39 Cont'd

FERC should find a greater impact given the severe harm this would place on the commercial fishing industry. Furthermore, *there is nothing proposed in the DEIS to even attempt to mitigate these impacts*.

d) Economic Impacts to Fisheries CO10-40

There is no analysis of how converting essential fish habitat (EFH) to permanent industry sites and/or how displacement and destruction of aquatic life will impact the commercial fishing industry. This omission is glaring, considering how often this has been a concern during the permitting process of other LNG projects in the past, both in the continental U.S. and abroad. For

[122] DEIS, 4-126, 127.
[123] DEIS, 4-288.
[124] DEIS 5-13.

CO10-40 As noted in section 4.9.2.2, potential impacts on fishery resources are discussed in section 4.6 of the EIS. Specific concerns raised by the commenter with respect to EFH are discussed in response to comments CO10-32 to CO10-38. Potential impacts on fishery resources are not expected to affect the commercial fishing industry.

instance, a 2009 Department of Fisheries study in Australia found that a proposed development of an LNG terminal on the west coast of Australia had the potential to significantly impact all fisheries that were active in the immediate and adjacent areas.[125] The study predicted there would be a reduction in the levels of fishing activity as a result of the LNG port, with "some flow-on effects to the economy of the region."[126] Some of the decline, the study predicted, would come about through the environmental changes created by the LNG project, such as the displacement of prawns, mackerel, pelagic gamefish, and pearling operations.[127] CO10-40 Cont'd

The increased vessel traffic to and from the export terminal,[128] in tandem with the destruction of essential fish habitats, would further interfere with commercial fishing operations. This is one of the primary effects expected to result from similar LNG projects.[129] For instance, experts commenting on Oregon's Jordan Cove Energy Project said the project would have undermined "decades of work to protect fishing opportunities" off the coast of Oregon, which risks undoing the advances that came about after "billions of dollars" were invested to restore salmon habitat in the region.[130]

The DEIS also fails to consider the interplay between the tourism and commercial fishing and shrimping industries. Damage to the commercial fishing and shrimping industries could also lead to a decrease in the number of tourists, which in turn could decrease the number of customers CO10-41

[125] Guy Wright and Christian Pike, *Fishing Industry Impact Study: James Price Point Proposed Liquefied Natural Gas Precinct,* Fisheries Occasional Publication No. 78, iii-iv, 2010, attached as Exhibit 47.
[126] *Id.* at iv.
[127] *Id.* at ix.
[128] See, *supra*, Section on TOURISM.
[129] Attached as Exhibit 48, available at http://www.beg.utexas.edu/files/energyecon/global-gas-and-lng/CEE_offshore_LNG.pdf
[130] "Science Shows Vital Fish Habitat Threatened by Proposed Oregon LNG Terminal," Columbia Riverkeeper (February 5, 2015), attached as Exhibit 49, available at https://www.columbiariverkeeper.org/news/2015/2/science-shows-vital-fish-habitat-threatened-proposed-oregon-lng-terminal. *See also* Eric de Place and Paelina DeStephano, "Jordan Cove Energy Project, LNG Facility May Harm Water Quality, Salmon Runs," Sightline Institute (August 1, 2018), attached as Exhibit 50, available at https://www.sightline.org/2018/08/01/jordan-cove-energy-project-oregon-could-harm-water-quality-salmon-runs/.

CO10-41 The Project is not expected to cause "damage to the commercial fishing and shrimping industries," and even if these types of effect were to occur, it is not clear how that would in turn affect the tourism industry. It may also be noted, as stated in section 4.9.2.2, that almost all of the shrimp landed at the Ports of Brownsville and Port Isabel is caught offshore in the Gulf of Mexico. The commercial fishing that does occur in the estuarine waters of Cameron and Willacy Counties is dominated by bait fisheries, with a small black drum (Pogonias cromis) commercial fishery also present.

available to local fishers and shrimpers. Not to mention, tourists may be dissuaded from buying locally-caught shrimp in an area dominated by petrochemical industry. While studies about this form of "seafood tourism" are not readily available about Texas, LNG-friendly coastal areas such as New South Wales in Australia find that domestic tourists expect to eat local seafood when traveling to the coast.[131] CO10-41

Not accounting for the effects of the project's impact on the commercial fishing and shrimping industries sufficiently is dangerous, given the economic importance of these fisheries and the adverse effects created by similar LNG projects elsewhere.

e) Additional Mitigation for Impacts to Fisheries Must be Proposed CO10-42

Further highlighting the absence of a discussion on the project's impact on commercial fishing, other LNG terminal projects in the past have tried to mitigate the impact on commercial and recreational fisheries in the surrounding areas. For instance, the 2005 approval of two offshore LNG terminals in Massachusetts was conditioned on a mitigation package that required the companies involved to provide $16 million to mitigate impacts to "commercial fishermen and lobstermen," $14 million to mitigate impacts to public trust interests, $9 million to mitigate impacts to marine habitat and resources, and $8 million to mitigate impacts to marine mammals.[132]

[131] Kate Barclay and Michelle Voyer, "Valuing Coastal Fisheries," University of Technology Sydney, October 2016, attached as Exhibit 51, available at https://www.uts.edu.au/about/faculty-arts-and-social-sciences/research/fass-research-projects/valuing-coastal-fisheries.
[132] Commonwealth of Massachusetts, "Romney Approves Two Offshore LNG Terminals," January 2005, attached as Exhibit 52, available at https://www.rigzone.com/news/oil_gas/a/39328/romney_approves_two_offshore_lng_terminals/.

CO10-42 The example provided in the comment refers to mitigation that was required by the Massachusetts Executive Office of Environmental Affairs (Rigzone.com 2006). As stated in the EIS (section 4.9.2.4), construction barge traffic is not expected to affect the passage of shrimp boats or other commercial fishing vessels through the BSC. Commercial fishermen who dock along the BSC may experience delays when LNG carriers are making ports of call at the Project site. Temporarily displaced shrimpers would be able to trawl elsewhere in the BSC or nearby Gulf of Mexico.

Reference: Rigzone.com. 2006. Romney Approves Two Offshore LNG Terminals. Website: https://www.rigzone.com/news/oil_gas/a/39328/ romney_approves_two_offshore_lng_terminals/ Accessed on March 18, 2019.

V. The DEIS Fails to Adequately Assess Impacts on Cultural Resources and Historic Properties.

CO10-43

Agencies that must comply with both the National Environmental Policy Act (NEPA) and section 106 of the National Historic Preservation Act (NHPA) are encouraged to coordinate their reviews.[133] The agencies must ensure that the NEPA documents "include[] appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of any adverse effects."[134] They must also go through the identification and assessment processes of the section 106 process "in a manner consistent with the standards and criteria of §§ 800.4 through 800.5."[135] FERC has chosen to incorporate its NHPA duties into its NEPA review process, and it must still properly identify and assess historic properties and fully perform its consultation duties in order to comply with section 106.

A. The DEIS Fails to Require FERC to Complete the Section 106 Consultation Process Before Authorizing the Project.

CO10-44

Section 106 of the NHPA requires "the head of any Federal department or independent agency having authority to license any undertaking" to consider the undertaking's effect on any "historic property" *before* "issuance of any license."[136] A historic property is "any prehistoric or historic district, site, building, structure, or object included on, or eligible for inclusion on, the National Register."[137] An undertaking includes "a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including . . . those requiring a Federal permit, license, or approval."[138] The section 106 process is laid out in more detail in the

[133] 36 C.F.R. § 800.8(a)(1).
[134] *Id.* § 800.8(a)(3).
[135] *Id.* § 800.8(c)(1)(ii).
[136] 54 U.S.C. § 306108.
[137] *Id.* § 300308.
[138] *Id.* § 300320.

CO10-43 Comment noted. See our assessment of compliance with section 106 in section 4.10 of the EIS.

CO10-44 It is standard practice for a Commission Order to include a condition that construction may not proceed until after the NHPA Section 106 compliance process has been completed. We summarize our compliance with Section 106 in section 4.10 of the EIS. We recommend that Annova file all outstanding reports and agency comments with the FERC and that FERC staff complete the Section 106 consultation process before construction may begin.

Code of Federal Regulations.[139] The purpose of the section 106 process is to require "Federal agencies to take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings."[140] The regulations are specific in their mention of when the process should occur: "The agency official must complete the section 106 process 'prior to the approval of any Federal funds on the undertaking or prior to the issuance of any license.'"[141] CO10-44

Annova LNG is seeking authorization from the Federal Energy Regulatory Commission (FERC), a federal agency, to "site, construct, and operate new liquefaction and export facilities."[142] Thus, this project is an undertaking requiring a "Federal permit, license, or approval" and the relevant agency, FERC, must go through the section 106 process to evaluate the undertaking's effect on historic properties.[143] It must complete the section 106 process *before* it gives its authorization to Annova LNG. Despite this clear mandate, FERC states in the DEIS that "[c]ompliance with Section 106 of the NHPA has not been completed."

To fulfill the requirements of section 106, various actions must still be taken by both Annova and FERC. Annova has yet to complete cultural resource surveys in certain parts of the Project area and it has not yet performed "NRHP eligibility testing of archaeological site 41CF48."[144] Consultation with various groups, including "the SHPO, Federal Land Managers, Indian tribes and other parties is incomplete," as well.[145] Instead of requiring completion of these activities before the undertaking is authorized, FERC recommends that "Annova file all CO10-45

[139] *See* 36 C.F.R. 800.1 *et seq.*
[140] 36 C.F.R. § 800.1(a).
[141] *Id.* § 800.1(c).
[142] Annova LNG Common Infrastructure, LLC, et al., Application for Authorization Under Section 3 of the Natural Gas Act, 1 (July 13, 2016).
[143] 54 U.S.C. § 300320.
[144] Federal Energy Regulatory Commission, Annova LNG Brownsville Project Draft Environmental Impact Statement Vol.1, 4-156 (Dec. 2018).
[145] *Id.*

CO10-45 See response to comment CO10-44.

outstanding reports and agency comments with the FERC and that FERC staff complete the Section 106 consultation process before construction may begin."[146] This implies that authorization will be given before the section 106 process is completed. CO10-45

Under § 800.4(b)(2) "final identification and evaluation of historic properties" may be deferred by an agency if specifically allowed for in "the documents used by an agency official to comply with [NEPA] pursuant to § 800.8."[147] Presumably this is why FERC would allow Annova to postpone surveying in the "sensitive thornshrub habitat and historical tidal flats" and evaluating site 41CF48 until approval is granted.[148] However, in the DEIS recommendations, it is unclear whether the cultural resources survey reports, site evaluation reports, and avoidance/treatment plans still to be submitted are related to these un-surveyed areas, or whether other reports are also lacking. The DEIS mentions at least one report, related to the archaeological resource potential of Access Road Alternative 2 (the proposed permanent access road), where FERC is unsure as to whether or not the report was submitted to the State Historic Preservation Officer.[149] Any required reports must be submitted before authorization is allowed.

If there remain reports to be submitted, comments to be made, or consultation to be performed, FERC should require that these steps and any other necessary steps towards compliance with the section 106 process be completed before it authorizes the Project, as is required under the NHPA. If phased/deferred identification and evaluation is allowed in specific areas, and the reports, comments, and consultation related to these areas are also to be deferred, this should be explained clearly in the EIS, so that ambiguity regarding compliance no longer exists. CO10-46

[146] *Id.* at 5-9.
[147] 36 C.F.R. § 800.4(b)(2).
[148] DEIS at 4-151.
[149] *Id.*

CO10-46 See response to comment CO10-44.

B. The area of potential effect for indirect impacts should be reconsidered and nearby historic sites should be re-evaluated for impacts. CO10-47

The area of potential effect(s) (APE), under the Section 106 regulations, "means the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties . . . The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."[150] During the Section 106 process, the agency must "determine and document the area of potential effects,"[151] determine whether any historic properties within the APE will be affected by the undertaking, and assess any adverse effects upon historic properties within the APE. [152] The agency must "apply the criteria of adverse effect to historic properties within the area of potential effects."[153] The regulations state that

> An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. . . . Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.[154]

A type of adverse effect is the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features."[155]

FERC has chosen a "0.5-mile area around the boundaries of the Project site, and a 300-foot area on either side of the access roads" as the APE for indirect effects.[156] Because of this, despite the presence of multiple historic properties listed on the National Register of Historic

[150] 36 C.F.R. § 800.16(d).
[151] *Id.* § 800.4(a)(1);
[152] *Id.* §§ 800.4 and 800.5.
[153] *Id.* § 800.5(a).
[154] *Id.* § 800.5(a)(1).
[155] *Id.* § 800.5(a)(2)(v).
[156] DEIS, 4-150.

CO10 continued, page 52 of 113

CO10-47 We disagree that we should enlarge the direct and indirect APE for evaluating impacts. However, we evaluate the potential impact on two NRHP-listed properties that lie outside the direct and indirect APE, the Palo Alto Battlefield NHL located approximately 9.1 miles west of the Project site, and the Brazos Santiago Depot located approximately 5.5 miles east of the Project site. See section 4.10.1.2. We also evaluate potential visual and noise impacts on the Laguna Atascosa and the Lower Rio Grande NWRs which are outside of the direct and indirect APEs. See sections 4.8.4, 4.8.5, and 4.11.2.

CO10-47 cont'd

Places nearby, the Palmito Ranch Battlefield National Historic Landmark (NHL) is the only non-archaeological historic resource within the indirect APE.[157] The APE used in the DEIS was chosen despite the fact that the National Park Service (NPS) expressed its concern over a 0.5-mile APE for indirect effects of the Project, calling it "insufficient due to the flat terrain of the area."[158] The structures, according to the NPS, will be visible from the two nearby Battlefields and "[c]onstruction noise and traffic will intrude on the sense of place, feeling and setting as will increased daily traffic during operations."[159]

FERC should reconsider its indirect APE. A larger APE would take into account the flat terrain in the area and the impact that tall structures, such as those required by the Project, have on such a landscape. As seen in the pictures used in the visual assessments and as stated by FERC, "[l]and in the vicinity of the Project is generally undeveloped and natural . . . flat to very gently rolling."[160] Across the ship channel is the Laguna Atascosa National Wildlife Refuge; next door is the Lower Rio Grande Valley National Wildlife Refuge.[161] Additional unnatural light, sound, and structure could affect the integrity of the surrounding area, including the nearby Battlefields. FERC demonstrates in its visual simulations that the Project will be visible from various key observation points (KOPs), such as from both Palmito Ranch Battlefield NHL and Palo Alto Battlefield NHL.[162] The agency claims that in many places, vegetation will conceal the Project

[157] *Id.* The Palmito Ranch Battlefield NHL is within the 300-foot APE of the Project's access road. The other historic properties in the area repeatedly addressed by the DEIS, but not within the APE for indirect effects, are the Palo Alto Battlefield NHL and the Brazos Santiago Depot. It is worth noting that despite the APE chosen by FERC, the agency still assessed all three sites for potential direct or indirect impacts, due to concerns expressed by cooperating agencies. *See* DEIS at 4-154 and 4-155.
[158] Annova LNG, Resource Report 4 Cultural Resources, vi (July 2016) ("Resource Report 4").
[159] *Id.*
[160] DEIS at 4-127; *see also* Federal Energy Regulatory Commission, Annova LNG Brownsville Project Draft Environmental Impact Statement Vol.2, Appendix E (Dec. 2018) ("DEIS Vol. 2").
[161] *See* U.S. Fish and Wildlife Service, Lower Rio Grande Valley, attached as Exhibit 53 and available at https://www.fws.gov/refuge/Lower_Rio_Grande_Valley/map.html.
[162] DEIS at 4-153 and 4-154; DEIS Vol.2, Appendix E.

from nearby vantage points, though it recognizes that the Project would be visible if the vegetation were removed.[163] The NPS states that vegetation should not be relied upon in the evaluation to block views of the facility, since vegetation can be quickly removed by wildlife and requires a long period of time to regrow.[164] In addition, there will be an increase in sound in the area during both construction and operation.[165] CO10-47

Due to the surrounding terrain and "the scale and nature of the undertaking," the Project could alter the "character or use of historic properties" further away than 0.5 miles or 300 feet.[166] The Project would be an incongruous industrial facility looming on the horizon of a largely undeveloped area, famous for its natural and historic character. Because of the Project's potential to cause adverse effects at a distance, FERC should consider a larger APE for indirect effects than the one currently relied upon. If it does so, it must also re-evaluate which historic resources are within the APE and whether those resources are subject to indirect impacts.

1. Palmito Ranch Battlefield NHL CO10-48

Regardless of whether or not the indirect APE is expanded, Palmito Ranch Battlefield NHL falls within the original APE used by FERC in the DEIS. Therefore, FERC must "apply the criteria of adverse effect" to Palmito Ranch and determine whether the Project "diminish[es] the integrity of the property's location, design, setting, materials, workmanship, feeling, or association."[167] The NPS has expressed concern that the Project affects some of these qualities, naming construction and increased traffic as issues that "will intrude on the sense of place, feeling

[163] DEIS at 4-153.
[164] Resource Report 4, vi.
[165] DEIS at 4-179 to 4-192.
[166] 36 C.F.R. § 800.16(d).
[167] *Id.* § 800.5(a)(1).

CO10-48 The EIS thoroughly evaluates the potential Project impacts on the Palmito Ranch Battlefield NHL. See sections 4.10.1.2, 4.8.4. 4.8.5, 4.11.2, and appendix E.

and setting."[168] It seems likely that the height, size, and associated sounds and traffic of the Project would constitute the "[i]ntroduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features."[169] CO10-48 cont'd

The Palmito Ranch Battlefield NHL is the site of the last land battle during the Civil War.[170] The Battlefield can be found within the Lower Rio Grande Valley National Wildlife Refuge "in much the same natural state as it appeared in 1865."[171] The area preserves a piece of historic landscape, one important both for its wildlife conservation purposes as well as its commemoration of history. The Battlefield's location and setting within a relatively untouched area of Texas allow the Battlefield to exist as it did at the relevant period of history for the Landmark: the Civil War. The feeling of Palmito Ranch is tied to the landscape appearing as it did over a hundred and fifty years ago. CO10-49

FERC recognizes the visual and auditory impacts the Project will have, but it still determines, at least in reference to the visual impacts, that the "Project would not affect the essential features of the Palmito Ranch Battlefield . . . and the overall integrity . . . would remain intact.[172] However, according to FERC: "Visible changes . . . would occur in the setting surrounding the property because the Project would be among the limited infrastructure that breaks above the horizon line; it would be visible from within the NHL, especially if vegetation is absent."[173] The access road would also "detract from the natural appearance of the battlefield at its boundaries."[174] In the DEIS, FERC often mentions the fact that the Project will be obscured by

[168] Resource Report 4, vi.
[169] 36 C.F.R. § 800.5(a)(2)(v).
[170] U.S. Fish and Wildlife Service, Lower Rio Grande Valley, Battle of Palmito, attached as Exhibit 54 and available at https://www.fws.gov/refuge/Lower_Rio_Grande_Valley/about/battle_of_palmito.html.
[171] *Id.*
[172] DEIS at 5-9.
[173] *Id.* at 4-153.
[174] *Id.*

CO10-49 See response to comment CO10-48.

vegetation if viewed from the Battlefield.[175] It also mentions that most views of the NHL face away from the Project.[176] But the NPS cautions against "counting on vegetation to screen the facility" since vegetation is easily altered and/or removed by wildlife.[177] The NPS also warns against assuming visitors will view the Battlefield from the roadside exhibit or viewing platform, where the visual assessments were performed.[178] The Battlefield may be experienced from a variety of angles, some of which may face the Project and lack a barrier of vegetation. CO10-49

The DEIS shows that construction and operation of the LNG facilities would increase the level of noise at the Battlefield. The construction noise would not only be "clearly audible," it would be a "doubling of ambient noise" at the Palmito Ranch Battlefield NHL.[179] Operational activities are also predicted to increase the sound at the NHL, though less so than during construction.[180] While the noise impacts on Palmito Ranch are assessed, they do not appear to be specifically addressed as an issue impacting the character of the site as a historic place. An increase in noise levels could well affect the character of the Battlefield, and the experience visitors have as they view it. While FERC does make suggestions related to the noise, it is unclear if these are meant to mitigate adverse impacts to nearby historic sites.[181] CO10-50

In addition to the impacts that Annova will have upon the Battlefield and any other historic properties in the area, there will also be cumulative effects caused by similar projects nearby, such as the Rio Grande LNG and Texas LNG projects.[182] FERC does recognize the potential for cumulative visual impacts on the area, saying that the "visual impact on the Palmito CO10-51

[175] *Id.*
[176] *Id.*
[177] Resource Report 4, vi.
[178] *Id.*
[179] DEIS at 4-186.
[180] *Id.* at 4-189.
[181] *See e.g.* DEIS at 4-189.
[182] *Id.* at 4-262 and 4-263.

CO10-50 See response to comment CO10-48.

CO10-51 We disagree. We believe the analysis in sections 4.8.5 and 4.10.1.2 of the EIS support the conclusion that the Project would not affect the essential features of the Palmito Ranch Battlefield for the period of significance (the Civil War) and its overall integrity would remain intact.

Ranch Battlefield NHL and the Palo Alto Battlefield NHL KOPs would range from no effect or negligible in some areas to moderate or moderately high in other areas."[183] There will also be cumulative auditory impacts on Palmito Ranch Battlefield NHL, both during construction and operation.[184] Annova is not the only LNG facility that will be visible from the Palmito Ranch Battlefield NHL, and the shift in the area from undeveloped to increasingly industrial should be analyzed more thoroughly due to the potential adverse impacts on the character and integrity of nearby cultural resources. There is also the issue of the increase in traffic that would occur if the three LNG sites were constructed simultaneously.[185] This could increase traffic times, and according to the NPS "intrude on the sense of place, feeling and setting."[186] CO10-51 Cont'd

As shown in the DEIS and as predicted by the NPS, the Project will affect historic properties, especially Palmito Ranch Battlefield NHL. The effects will be both visual and auditory, and there will be cumulative effects caused by other nearby LNG projects as well. FERC should reconsider its conclusion that the visual effects on Palmito Ranch will not "affect the essential features" of the Battlefield.[187] It should also consider the impact of auditory effects on the NHL in its assessment of potential adverse effects. The quiet, undeveloped, and natural appearance of the area is an important part of what allows the Landmark to maintain its character and connection to the past. Both the NHPA and the Section 106 regulations demand additional attention in a situation with an "undertaking that may directly and adversely affect any National Historic Landmark."[188] FERC should recognize the adverse effects on the Battlefield and move forward with the Section 106 process, including resolving any adverse effects, consulting with the CO10-52 CO10-53

[183] *Id.* at 4-298.
[184] *Id.* at 5-12 and 5-13.
[185] *Id.* at 5-13.
[186] *Id.*; Resource Report 4, vi.
[187] DEIS at 5-9.
[188] 54 U.S.C. § 306107; *see also* 36 C.F.R. § 800.10.

CO10-52 We disagree. We believe the analysis in section 4.11.2 supports the conclusion that noise from the Project would not have a significant effect on the Palmito Ranch Battlefield.

CO10-53 See response to comment CO10-44.

relevant parties, and involving the Advisory Council on Historic Preservation, if necessary.[189] CO10-53

CO10-54

VI. The DEIS Fails to Adequately Assess Impacts on Listed and Sensitive Species

A. NEPA Obligations Respecting Wildlife and Listed Species

Under the Natural Gas Act, the Commission cannot approve Annova's application if it determines that the construction and operations "will not be consistent with the public interest" or are not required by the "public convenience and necessity."[190] The determination of whether a proposed facility is consistent with the public interest, in turn, depends upon the environmental impact of the facility.[191] Moreover, the Commission may only approve an LNG application (whether in whole or part) "with such modifications and upon such terms and conditions as the Commission find[s] necessary or appropriate" to ensure consistency with the public interest.[192] Stated another way, the Commission must consider whether impacts that are unavoidable and irreducible render the proposal inconsistent with the public interest.

The National Environmental Policy Act ("NEPA") has two objectives: (1) it requires an agency "to consider every significant aspect of the environmental impact of a proposed action"; and (2) "it ensures that the agency will inform the public that it has indeed considered environmental concerns in its decisionmaking process."[193] "Part of the harm NEPA attempts to prevent in requiring an EIS is that, without one, there may be little if any information about

[189] The ACHP must be invited to participate when the undertaking will have an adverse effect on an NHL. 36 C.F.R. § 800.6(a)(1)(i)(B).
[190] 15 U.S.C. §§ 717b(a), 717f(c).
[191] *See Sabine Pass Liquefaction Expansion*, 151 FERC ¶ 61012, at 27 n.32 (Apr. 6, 2015) (explaining that the Commission's public interest review evaluates the environmental impacts of the siting, construction, and operation of the export facility).
[192] 15 U.S.C. § 717b(e)(3)(A).
[193] *United States v. Coal. for Buzzards Bay*, 644 F.3d 26, 31 (1st Cir. 2011) (internal citations omitted).

CO10-54 We disagree that the draft EIS fails to adequately address impacts on listed and sensitive species. See responses to individual comments below.

prospective environmental harms and potential mitigating measures."[194] Notably, the Council on Environmental Quality ("CEQ") Regulations implementing NEPA state that "NEPA procedures *must insure that environmental information is available to public officials and citizens before decisions are made* and before actions are taken."[195] Thus, NEPA compliance informs the Commission's public interest determination under the Natural Gas Act and helps ensure that it will minimize the environmental harm resulting from the development of LNG facilities, and—more importantly—will avoid harms that are so great as to outweigh the benefits of constructing a terminal in a particular location.

Environmental impact statements "shall…be supported by evidence demonstrating that agencies have made the necessary environmental analyses" to avoid or minimize any possible adverse effects of their actions upon the quality of the human environment.[196] Moreover, an EIS must "state how alternatives considered in it and decisions based on it will or will not achieve the requirements of…other environmental laws and policies."[197] The adequacy of an agency's EIS turns on:

> (1) whether the agency in good faith objectively has taken a hard look at the environmental consequences of a proposed action and alternatives;
>
> (2) whether the EIS provides detail sufficient to allow those who did not participate in its preparation to understand and consider the pertinent environmental influences involved; and
>
> (3) whether the EIS explanation of alternatives is sufficient to permit a reasoned choice among different courses of action.[198]

[194] *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 23 (2008).
[195] 40 C.F.R. § 1500.1(b) (emphasis added).
[196] 40 C.F.R. § 1500.2(b).
[197] 40 C.F.R. §1502.2(d).
[198] *Davis Mountains Trans-Pecos Heritage Ass'n v. Fed. Aviation Admin.*, 116 Fed. Appx. 3, 8-9 (5th Cir. 2004).

The Commission has promulgated a series of regulations to "implement [FERC's] procedures" under NEPA and "supplement the regulations of the [CEQ]."[199] These regulations require the Commission to identify and assess the extent of the impact of each proposed facility on wildlife, including threatened and endangered species, and including a discussion of what mitigation is necessary to ensure consistency with the public interest, or whether alternative sites for the export terminal would avoid or reduce those impacts.[200] Moreover, NEPA also requires that the Commission determine the *cumulative* impacts of developing the three facilities currently proposed for the Brownsville Ship Channel area—including cumulative effects on wildlife and listed species.[201] CO10-55

The Commission erroneously seeks to defer responsibility regarding its NEPA obligations with respect to threatened and endangered species. The DEIS "recommend[s] that Annova should not begin construction until the FERC staff completes section 7 consultation with the FWS and NOAA Fisheries."[202] An action agency cannot satisfy the NEPA requirement to identify the extent of impact to listed species in the EIS merely by stating that the project will ultimately

[199] 18 C.F.R. § 380.1; *see generally* 18 C.F.R. Part 380.
[200] *See, e.g.*, 18 C.F.R. § 380.12(e) (requiring identification of listed species *and* discussion of potential mitigation measures); § 380.13(b) (describing required content for a biological assessment and incorporating those requirements into NEPA analysis); § 380.15 (requiring that the "siting…of facilities shall be undertaken in a way that avoids or minimizes effects on…wildlife values."). Regarding the biological assessment incorporated into FERC's NEPA procedures via 18 C.F.R. § 380.13(b), the regulations provide that it "must contain the following information for each species…:"

(A) Life history and habitat requirements;
(B) Results of detailed surveys to determine if individuals, populations, or suitable, unoccupied habitat exists in the proposed project's area of effect;
(C) Potential impacts…that could result from the construction and operation of the proposed project…; and
(D) Proposed mitigation that would eliminate or minimize potential impacts.

18 C.F.R. § 380.13(b)(5)(ii) (emphasis added).
[201] 18 C.F.R. §380.12(b)(3).
[202] DEIS 5-6.

CO10-55 FERC staff have not deferred NEPA obligations with respect to federally listed threatened and endangered species. Section 4.7.1 of the EIS includes the NEPA evaluation of potential impacts on federally listed threatened and endangered species.

incorporate the results of the Section 7 consultation process.[203] Because NEPA requires that the extent of the impacts be identified and made available for public review (42 U.S.C. § 4332(2)(G)), the reliance on the content of a yet to be developed Biological Opinion cannot satisfy NEPA's requirement to provide the public with an opportunity for comment on the actual extent of the impacts that will occur.[204] Moreover, NEPA separately requires FERC to state how the decision to approve Annova LNG's project would comply with the ESA.[205] CO10-55

B. The DEIS Fails to Adequately Assess the Project's Significant Effects on Listed Species CO10-56

A review of the DEIS and materials provided by Annova reveals that the analysis contains insufficient information to fully determine the extent of adverse effects on listed species, or to determine whether proposed mitigation measures are sufficient to eliminate, avoid, or minimize adverse effects on those species.[206]

1. Endangered Ocelot

The ocelot (*Leopardus pardalis*) is an endangered species with two nearby U.S. populations, one at the Laguna Atascosa National Wildlife Refuge, immediately north of the Annova LNG and other terminal sites, and the other population some 20 miles north of the refuge on private ranchland in Kenedy and Willacy Counties. The ocelot is also considered endangered in Mexico by the Secretariat of the Environment and Natural Resources. Habitat loss is the

[203] *Cf. Forest Service Employees for Envtl. Ethics v. U.S. Forest Service*, 727 F. Supp. 2d 1195, 1213 (D. Mont. 2010) ("Plaintiff correctly observes that [*Envtl. Prot. Info. Ctr. v. U.S. Forest Service*, 451 F. 3d 1005 (9th Cir. 2006)] does not allow an action agency to completely ignore an issue in its NEPA documents so long as the matter is discussed in adequate detail in a biological opinion….").
[204] *See Greater Yellowstone Coalition v. Flowers*, 359 F.3d 1257, 1275–76 (10th Cir. 2004) (recognizing FWS conclusion that action not likely to cause jeopardy does not necessarily mean impacts are insignificant).
[205] 40 C.F.R. § 1502.2(d).
[206] In addition to the impacts discussed below, we adopt and incorporate in full Defenders of Wildlife's Scoping Comments on Rio Grande LNG (FERC Docket #PF 15-20-000), Annova (FERC Docket #PF 15-15-000); Texas LNG (FERC Docket #PF 15-14-000), dated September 3, 2015, attached to Defenders of Wildlife's Motion to Intervene, FERC Docket No. 16-116, Accession No. 20160504-5053.

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CO10-56 We disagree that the analysis in the EIS fails to adequately address effects on listed species. See response to individual comments below.

primary reason ocelots have largely disappeared from the U.S./Mexico borderlands. The Fish and Wildlife Service and nongovernmental organizations have been working for decades to protect and restore the ocelot in the U.S.—and to make progress toward restoring connectivity between the two U.S. ocelot populations and the larger Mexican population. There are three predominant reasons that the DEIS and supporting documentation's analysis regarding ocelot impacts provide insufficient basis to approve Annova's project. CO10-57

First, the impact of the project on the north-south ocelot movement corridor is largely dismissed or mischaracterized. For decades, FWS and partner organizations have been purchasing land and arranging easements with the goal of protecting habitat and wildlife corridors that would maintain connections between ocelot populations in the U.S., including habitat north and south of the Brownsville Shipping Channel ("BSC"), with the ultimate vision of retaining connectivity to the population in Tamaulipas, Mexico.[207] The effects of Annova LNG's proposed export terminal project along the shipping channel—and particularly in light of the combined effects of this project with the proposed Rio Grande LNG and Texas LNG terminals—would be to greatly reduce the width of (if not basically eliminate) the currently existing corridor. The corridor would be restricted, at best, to a band that varies from approximately 700 to 1,800 feet wide very close or adjacent to LNG terminals that ocelots are likely to avoid because of light, noise, and human activity. Indeed, FWS has stated: "If the Annova site is developed as proposed, we believe the remaining coastal ocelot corridor to the Rio Grande River and Mexico will be severed."[208]

Once the terminals are under construction or completed, an ocelot seeking to move north or south would have to approach the lighted, noisy facilities, locate and travel through a narrow

[207] *See, e.g.*, Exhibit 55, available at https://www.kveo.com/news/local-news/-11-million-for-conservation-projects/1614349403).
[208] FE CP16-480, Accession No. 20160816-5175 at 21 (Exhibit 3 to Comments of Defenders of Wildlife on Annova Application).

CO10-57 We disagree that the EIS largely dismisses or mischaracterizes potential impact on the ocelot north-south movement corridor and the significance of impacted habitats. However, based on this request, section 4.7.1.2 of the final EIS has been revised to include additional discussion of the north-south movement corridor (South Texas Coastal Corridor) and potential project impacts. Cumulative impacts on the north-south movement corridor, including specifically from the three proposed LNG projects, is addressed in section 4.13.3.5. Section 4.13.3.5 of the final EIS has also been updated to address comments on the draft EIS, including from the FWS.

easement adjacent to a terminal, swim the channel, and then exit the channel via a second easement, again in close proximity to a lighted and noisy industrial area. In addition, ocelots would have to use culverts to cross access roads or risk being killed by a vehicle strike. It is unlikely that ocelots would successfully run this gauntlet—and therefore likely that the three terminals would permanently cut the connection between ocelots north and south of the channel. The stark and likely impact is a loss of connectivity that may jeopardize long-term viability of the U.S. ocelot population by substantially reducing the area available to ocelots and ending hope of eventual natural gene flow from the Mexican population. CO10-57 Cont'd

Annova LNG's documentation fails to acknowledge the three terminals' combined role in cutting this vital corridor. In its Revised Sensitive Species Report, Annova LNG excludes the Rio Grande LNG and Texas LNG terminals from its cumulative effects analysis based on those projects' separate ESA consultations.[209] As discussed above, ESA consultation alone is not sufficient for NEPA purposes. Moreover, NEPA's cumulative impacts analysis covers a broader scope than the ESA.[210] FERC must disclose and evaluate the other two terminals' effects on the ocelot (as well as other listed species) as part of the cumulative impacts analysis, particularly in terms of the destruction of habitat and corridors. This failure to fully disclose and analyze impacts on the ocelot violates NEPA's "hard look" requirement and prevents the public from "understand[ing] and consider[ing] the pertinent environmental" effects of Annova LNG's project.[211]

The second reason that the Annova DEIS is deficient is that it contains insufficient CO10-58

[209] FE CP16-480, Accession No. 20170316-5069 at 140-41.
[210] *Compare* 50 C.F.R. § 402.02 (definition of cumulative effects under the Services' ESA consultation regulations) *with* 40 C.F.R. § 1508.7 (definition of cumulative impact under NEPA includes "past, present, and reasonably foreseeable future actions *regardless of what agency ...or person undertakes such actions*") (emphasis added).
[211] *Davis Mountains*, 116 Fed. Appx. at 8-9; *see also* 18 C.F.R. §§ 380.12(e) & 380.13(b)(5)(ii)(C).

CO10-58 The EIS includes information that is currently know about measures that would avoid, minimize, or mitigate for impacts on the ocelot from construction and operation of the Project. Greater detail is also included in the BA which the FWS will use in its evaluation of impacts on the species.

information to evaluate whether significant impacts on the ocelot are avoided, eliminated, or minimized. The DEIS discloses three conservation measures Annova LNG may take to reduce impacts on ocelot: (1) consideration of funding off-site conservation lands, (2) shifting its project site east to accommodate a wildlife corridor, and (3) funding an extension of the Redhead Ridge Conservation Easement on the opposite shore of the shipping channel.[212] The latter two conservation measures are likely insufficient to avoid significant impacts to ocelot because it is unlikely ocelot will utilize these corridors, for the reasons discussed above.[213] Moreover, Annova LNG only proposes to protect these two corridors for the life of the project instead of in perpetuity, so mitigation effects could be short-term while the negative effects of the habitat destruction long-term. CO10-58

Regarding off-site conservation lands, the DEIS assumes that it would contribute to the Project minimizing impacts on ocelot. But without more information, the assumption is all there is. The proposed conservation measure cannot be evaluated to determine the extent—if any—that it would address the loss of connectivity, loss of habitat, as well as other adverse effects (*e.g.*, noise and lights). The DEIS's conclusion that Annova's conservation measures "would" minimize impacts is unwarranted where the DEIS simultaneously concludes that funding for conservation lands only "may" benefit ocelots.[214] Indeed, Annova LNG has not even committed to purchase land or easements but, according to the DEIS, is simply "evaluating" doing so.[215] While the DEIS does not show Annova's proposed mitigation to be effective, it is also clear that the loss of connectivity caused by the three terminals would be an enormous problem for the ocelot. Should

[212] FE CP16-480, Accession No. 20181214-3018 at 169-70.
[213] Moreover, Annova does not propose to protect those corridors in perpetuity, thus undermining the entire purpose of maintaining connectivity to ensure genetic interchange.
[214] *Id.*
[215] FE CP16-480, Accession No. 20181214-3018 at 169-70.

connectivity be lost, delisting the ocelot would require an additional population of 75 ocelots in Texas—over the 200 ocelots necessary if connectivity and genetic exchange is maintained.[216] (For comparison, there are currently estimated to be around 50 ocelots remaining in Texas.) Based on the typical male ocelot's range of 5 square miles, there would need to be over 100,000 acres of suitable ocelot habitat protected off-site to support that additional population of 75 ocelots.[217] If the projects contributing to cutting off connectivity, such as Annova's and the other two LNG terminals, do not adequately compensate for these losses, then those substantial costs will eventually be borne by the federal government and/or the public. CO10-58 Cont'd

Third and finally, Annova and FERC have failed to develop and evaluate sufficient alternatives for its project that would have fewer impacts on ocelot. As discussed in more detail in Part III.B, the DEIS must evaluate alternatives that would result in the terminal site having a smaller footprint. A robust evaluation of these alternatives is critical not just with regard to impacts such as wetlands, but because decreasing the operational footprint at the terminal site may reduce impacts to ocelot and ocelot habitat. For example, it could directly increase the amount of habitat available to ocelot. Moreover, it could increase the width (and effectiveness) of the corridor that is critical to movement and effective genetic variability of ocelot in Texas and Mexico. Finally, if certain facilities are moved to a remote site, noise and light impacts could be significantly mitigated. But because such alternatives were given no consideration in the DEIS, neither FERC nor the public can evaluate the true extent of the project's impacts on ocelot, or whether those impacts can be mitigated to insignificance. Based on this deficiency, as well as the other two reasons discussed above, the Commission has not taken the "hard look" at ocelot CO10-59

[216] Exhibit 56 at 53-55 (Ocelot Recovery Plan, First Revision).
[217] Exhibit 57 at 23.

CO10-59 Section 3.4 of the EIS includes evaluation of alternative sites along the BSC. Each of the alternative sites would involve different impacts on ocelot habitat and potential impacts on the South Texas Coast Corridor for ocelot movement. As stated in the EIS we conclude that none of the alternative sites would result in an environmental advantage over the proposed site. See also response to comment CO10-13.

impacts necessary to comply with NEPA.[218] CO10-59 Cont'd

2. Threatened Piping Plover and Red Knot CO10-60

Annova LNG's Revised Sensitive Species Assessment and the Annova DEIS note that there is typical wintering habitat for both the endangered piping plover (*Charadrius melodus*) and threatened red knot (*Calidris canutus rufa*) on the project site itself,[219] as well as wintering critical habitat for piping plover[220] on part of the project site. The assessment states that the red knot and the piping plover may lose wintering/foraging habitat and that human activity associated with the terminal may prevent both species from using additional habitat adjacent to the site. However, Annova LNG does not anticipate adverse effects on either bird because "there is abundant high-quality wintering habitat in the vicinity."[221] The implication, for which no evidence is presented, is that there is underutilized feeding habitat available for wintering birds to use.[222] The validity of this assumption is biologically questionable. These birds are likely imperiled because of the *cumulative* effects of habitat loss that, in turn, results in inadequate food supplies. For example, the large decline in red knot that led to its listing as threatened in 2015 was caused primarily by a decline in food availability when the birds arrived on migration in Delaware Bay.[223] If food is similarly limiting piping plover and red knot along the South Texas coast, there is reason to assume that alternative habitat with adequate food is not available, and accordingly, the Annova LNG project, alone and in conjunction with other industrial projects nearby, may have significant adverse impacts to the piping plover and red knot. Without analysis that demonstrates that

[218] *See, e.g.*, *Davis Mountains*, 116 Fed. Appx. at 8-9.
[219] *E.g.*, FE CP16-480, Accession No. 20181214-3018 at 174.
[220] *Id.* at 173.
[221] FE CP16-480, Accession No. 20170316-5069 at 124 (Revised Sensitive Species Assessment, p. 85).
[222] FE CP16-480, Accession No. 20181214-3018 at 175.
[223] *See generally* U.S. Fish and Wildlife Service, Red Knot (2018), available at https://www.fws.gov/northeast/redknot/.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 66*

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CO10-60 As noted in section 4.7.1.3, the Project would result in the permanent loss of one acre of potential suitable habitat for the piping plover and red knot. Although this one acre is not designated critical habitat, available designated critical habitat in the area can be used to place the loss of one acre of potential habitat in context. The one acre would represent 0.01 percent of critical habitat in the 7,217-acre Unit TX-1. We maintain that this impact on potential habitat may affect but is not likely to adversely affect the piping plover and red knot. With regard to additional conservation measures, we maintain that no additional measures are necessary, but the FWS may recommend or require additional conservation measures as part of its review of the BA.

sufficient food *is* available on other habitat, the conclusion that the project is not likely to adversely affect the red knot or piping plover is unwarranted. Further, because the DEIS does not adequately evaluate the extent to which alternative habitat with available food exists, the Commission has not taken a "hard look" at the impacts to these birds.[224] CO10-60

Moreover, cumulative loss of habitat by the LNG plants and other development in the area may also decrease feeding effectiveness by altering the distribution of wetland habitat. Shorebirds have been found to be more effective at feeding with lower search costs and exploit more feeding sites when distance between wetlands decreases and the percentage of the landscape occupied by wetlands increases.[225] In other words, the habitat that would be affected may be part of a web of nearby lands that together increase overall feeding efficiency. Thus, the Annova LNG terminal may contribute to what is effectively an overall loss in available food in the general area. The DEIS fails to adequately evaluate this issue or determine whether additional conservation measures are necessary to offset the loss of feeding habitat for piping plover and red knot. Moreover, there is no evaluation of whether the proposed wetland restoration at Little San Martin Lake would create habitat for these birds that would offset the loss of feeding habitat for piping plover and red knot.

The DEIS finds that the project "would not significantly destroy or adversely modify" designated critical habitat for piping plovers located on the east side of the Project site" because "only one acre of habitat would be removed and there is abundant high-quality wintering habitat in the vicinity of the Project site."[226] As discussed above, neither the DEIS nor the assessment provides scientific evidence that nearby "high-quality wintering habitat" is underutilized and CO10-61

[224] *See Davis Mountains*, 116 Fed. Appx. at 8-9.
[225] Farmer, A.H. and A.H. Parent. 1997. Effects of the Landscape on Shorebird Movements at Spring Migration Stopovers. The Condor Vol. 99, No. 3 (August 1997), pp. 698-707, attached as Exhibit 58.
[226] FE CP16-480, Accession No. 20181214-3018 at 389.

CO10-61 As stated in section 4.7.1.3, one acre of potential habitat would be permanently affected by the Project. While the Project site includes 13.4 acres of designated critical habitat, the portion of the site that contains critical habitat would not be directly affected, and therefore no designated critical habitat would be directly impacted by the Project. The 13.4 acres of critical habitat within the Project site is approximately 0.2 percent of the critical habitat included in the 7,217-acre Unit TX-1, and 0.02 percent of the total piping plover critical habitat designated in Texas. We maintain that constructing and operating the Project would not significantly destroy or adversely modify piping plover critical habitat.

therefore available to birds displaced from the site. Moreover, by focusing on the "one acre of habitat" that would be permanently removed, the DEIS understates the potential effects of the project for two reasons. First, plovers may be excluded not only from the one acre where habitat will be removed, but also from the other estimated 12.4 acres of critical habitat by human activity.[227] Indeed, the DEIS notes that human activity may flush birds from habitat near but not on the site, with the clear implication that birds may be displaced from habitat on the site. The EIS should clarify impacts on all piping plover critical habitat. CO10-61 Cont'd

A second way the focus on destroyed critical habitat understates the effects is that it overlooks habitat that has not been designated as critical. Table 5 in the Revised Sensitive Species Assessment indicates that there is a total of 31 acres of suitable habitat for piping plover on the site[228], and impacts on these acres should be analyzed with respect to survival of the plover and red knot. Moreover, depending on a species' sensitivity to disturbance from human activities, the loss of those 31 acres may also represent a loss of a buffer around the designated habitat, in turn resulting in the adverse modification of the critical habitat. The failure of the DEIS to evaluate this issue renders it deficient.

3. Endangered and Threatened Sea Turtles

CO10-62

The project documentation also contains insufficient information to determine whether there are sufficient conservation measures to minimize the project's impacts on listed sea turtles. Sea turtle species that may be present within the project's general area include Kemp's ridley, hawksbill, leatherback, loggerhead, and the green sea turtle. All these species are endangered

[227] Total acres of CH given as 13.4. FE CP16-480, Accession No. 20181214-3018 at 173.
[228] FE CP16-480, Accession No. 20170316-5069 at 10 (Revised Sensitive Species Assessment, p. 61, Table 5).

CO10-62 The evaluation of potential impacts on sea turtles in section 4.7.1.4 of the EIS acknowledges the potential for vessel strikes on sea turtles, and mortality as a result. However, based on this comment we have updated section 4.7.1.4 to include additional information on the potential for vessel strikes to occur.

except for the green, whose population off the Texas coast is classified as threatened. Critical habitat for the loggerhead turtle has been mapped offshore.

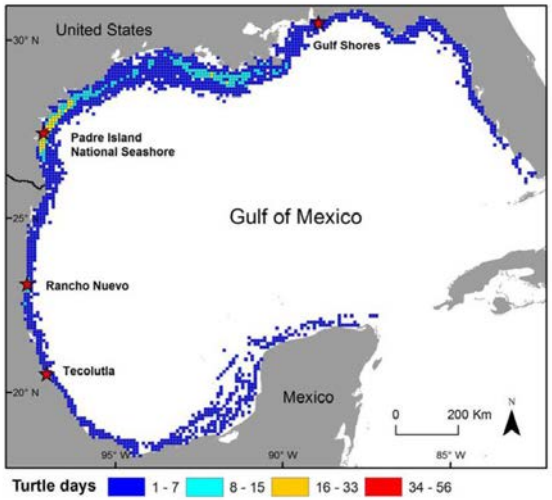
CO10-62 Cont'd

Annova LNG does not adequately evaluate the potential for collision with ships as a significant risk to sea turtles associated with the project, both directly and in conjunction with the increased traffic resulting from the two other terminal projects.[229] Turtles are vulnerable because they surface to breathe; often bask, feed, and mate near the surface where they are struck; and are more vulnerable during cold spells when they are unable to move as effectively. They are also more vulnerable when ships travel at high speed because the turtles cannot take effective evasive action.[230] The bodies of most struck turtles are not recovered, but dead and injured turtles that wash up on shore include turtles clearly struck by ships. NOAA collects statistics on turtle strandings off the Texas coast, although these statistics are not broken down by cause of death. In Zone 21 of NOAA's Gulf of Mexico sea turtle coastal habitat zoning, the number of strandings of all threatened or endangered species of sea turtles from 2010 to 2018 was 3,390. This includes the area of Padre Island and South Padre Island (offshore and in-shore strandings).[231] Some proportion are likely due to collision and could increase as a greater number of ships enter the Brownsville ship channel arriving at the three new LNG terminals. To comply with NEPA, the Annova LNG EIS must analyze this issue.

Turtles are known to be present in high density in this area, as shown in the map below, so

[229] *See, e.g.*, NOAA Fisheries Service & U.S. Fish and Wildlife Service. 2008. Recovery Plan for the NW Atlantic Population of the Loggerhead Sea Turtle, attached as Exhibit 59; Denkinger et al. 2013. Are boat strikes a threat to sea turtles in the Galapagos Marine Reserve? Ocean & Coastal Management Volume 80, pp 29-35, Exhibit 60.
[230] Hazell et al. 2007. Vessel speed increases collision risk for the green turtle *Chelonia mydas*. Endangered Species Research Volume 3, pp. 105-113, attached as Exhibit 61.
[231] Data from NOAA Southeast Fisheries Science Center, available at https://grunt.sefsc.noaa.gov/stssnrep/SeaTurtleReportI.do?action=reportquery. Zone 21 covers roughly 60 miles of Texas coastline from slightly north of Port Mansfield through the border with Mexico.

many ship-turtle collisions are likely.[232] The Annova LNG project and other LNG projects planned along the shipping channel will significantly increase the amount of ship traffic in the area, thereby increasing the probability of collision and turtle death. This may especially negatively impact nesting beaches for the Kemp's ridley, which nest along Boca Chica beaches in South Padre island at the entrance to the ship channel. The project documentation fails to quantify the increased vulnerability to vessel strikes, and therefore—contrary to NEPA's requirements—it is impossible to determine whether vessel strikes associated with the project are causing significant adverse effects on any of the listed sea turtle species.[233] CO10-62



[232] Shaver D. et al. 2016. Migratory corridors of adult female Kemp's ridley turtles in the Gulf of Mexico. Biological Conservation, Vol. 194, pp 158-167, attached as Exhibit 62.
[233] FE CP16-480, Accession No. 20181214-3018 at 181.

Moreover, the documentation shows insufficient evaluation of mitigation measures related to sea turtles. Turtle mortality from collisions can be reduced if ships travel more slowly and if ships avoid turtles. Such avoidance guidelines have been promulgated by the National Marine Fisheries Service (NMFS).[234] Though the Annova DEIS refers to these guidelines, stating that the increase in vessel strikes due to the project "would be small due to implementation of the NOAA Fisheries' guidance,"[235] it provides no evidence that these purely voluntary guide lines would be followed or that the effects would indeed by "small." Indeed, there is reason to believe the guidelines would not be followed—there are additional costs when ships travel slowly, as has been calculated for the right whale seasonal management areas off the east coast near Boston, Massachusetts.[236] Based on these increased costs, ships have an economic incentive not to comply with the voluntary NMFS guidelines, and there is little reason to believe they would do so. Based on the information available in the DEIS, it appears unlikely that Annova LNG's proposed conservation measures would prevent significant impacts to listed species of sea turtles due to increased vessel strikes. Regardless, the lack of adequate evaluation of the issue does not comply with NEPA.[237] CO10-63

Other measures are available that may mitigate vessel strikes. For example, a speed control area such as the one set for right whales is precedent for a mandatory vessel speed limit.[238] Because increased ship traffic due to the LNG sites would likely increase mortality of endangered and threatened turtles, NEPA requires the Annova LNG project's EIS to demonstrate the

[234] NOAA Fisheries Service, Southeast Regional Office. 2008. Vessel Strike Avoidance Measures and Reporting for Mariners, attached as Exhibit 63.
[235] FE CP16-480, Accession No. 20181214-3018 at 191.
[236] NOAA Fisheries Service. 2012. Economic Analysis of North Atlantic Right Whale Ship Strike Reduction Rule, attached as Exhibit 64.
[237] *E.g.*, *Davis Mountains*, 116 Fed. Appx. at 8-9.
[238] NOAA Fisheries Service. 2018. Compliance Guide for Right Whale Ship Strike Reduction Rule (50 CFR 224.105), attached as Exhibit 65.

CO10-63 See response to comment CO10-62. In revised section 4.7.1.4 of the EIS we conclude that the addition of 125 LNG carriers per week to the BSC and Gulf of Mexico waters would not be likely to adversely affect sea turtles through vessel strike. As a result, we are not recommending additional mitigation measures and we maintain that constructing and operating the Project may affect but is not likely to adversely affect any sea turtle species.

Commission's "hard look" at all such measures to avoid, eliminate, or minimize significant effects on listed sea turtles, including creation of a mandatory ship speed control area in the vicinity of the mouth of the shipping channel sufficiently large to significantly reduce turtle mortality. CO10-63

C. The DEIS Fails to Adequately Assess Mitigation for Wildlife CO10-64

The DEIS and Annova LNG's supporting documentation fail to provide sufficient species-specific analyses that would allow the Commission to determine whether Annova LNG's other proposed conservation measures will ensure that the project does not jeopardize the continued existence of the listed species above. Because the terminal site includes a mosaic of different habitat types that support different species, effects on species supported by these habitat types need to be specifically evaluated. For example, thorn scrub is ocelot habitat, while Gulf Coast salty prairie is habitat for Aplomado falcon. Other types of habitat on the site include loma grassland (potential ocelot hunting ground), loma evergreen shrubland, loma deciduous shrubland, as well as significant acreage of varying types of wetlands and open water. Annova LNG is taking a species-specific approach to ocelot mitigation, but has not done a similar analysis or developed conservation measure alternatives specific to Aplomado falcon, piping plover, red knot or sea turtles, which it should do. Without evaluating lost habitat for each listed species, the Commission is unable to determine whether Annova LNG's conservation measures will prevent significant impacts to any individual listed species (or critical habitat), and therefore has not taken the "hard look" and environmental impacts that NEPA requires.

D. FERC Has Failed to Comply with the ESA's Consultation Requirements CO10-65

Pursuant to Section 7(a)(2) of the ESA, the FERC may not take an action—here, authorizing the construction of an LNG export terminal and associated supply pipeline—that is

CO10-64 We disagree. Section 4.7 of the EIS includes a species-specific assessment of habitat loss as well as other potential construction and operation impacts. Our conclusions and determinations of effect for each species are based on this species-specific analysis.

CO10-65 On February 15, 2019, we sent the Biological Assessment to the FWS with a letter requesting concurrence with our determinations of effect contained in our Biological Assessment for the Project (see FERC Docket accession number 20190215-3006). It is standard practice for a Commission Order to include a condition that construction may not proceed until after section 7 consultation under the Endangered Species Act has been completed. Here, we recommend that Annova should not begin construction until the FERC staff completes section 7 consultation. The public will continue to have the opportunity to review and comment on filings as they are made with the Commission.

"likely to jeopardize the continued existence" of listed species or may destroy or adversely modify critical habitat. 16 U.S.C. § 1536(a)(2); *see* 50 C.F.R. §§ 402.02, 402.03. The consultation must include an analysis of the effects of building the LNG export terminal and supply pipeline, including the effects on the various listed species and critical habitat discussed above. *See, e.g.*, 50 C.F.R. §§ 402.02, 402.12, 402.14. The Services have not evaluated whether Annova LNG's project jeopardizes the listed species or destroys/adversely modifies the critical habitat discussed above. Because consultation is "ongoing," FERC staff recommends that "Annova should not begin construction until the FERC staff completes section 7 consultation."[239] But this does not go far enough. FERC may not rely on a future consultation with an unknown outcome to authorize this project. NEPA requires FERC complete its formal consultation *before* making a determination on this project under the Natural Gas Act. CO10-65

VII. The DEIS Fails to Take a Hard Look at Wetlands Impacts CO10-66

According to the DEIS, approximately 165 acres of wetlands would be within the construction footprint of the Annova terminal site and permanent access road.[240] The terminal and access road will "permanently affect" 52.8 acres of wetlands, largely through conversion to uplands.[241] Beyond these intentional changes, other wetlands will be temporarily or permanently degraded, as restoration of disturbed wetlands will take years to complete and is not expected to fully restore original conditions.[242] Moreover, the impacts from the associated natural gas supply lateral may be significant. The DEIS violates NEPA because it fails to take a hard look at reasonable alternatives regarding reduction and mitigation of these alternatives, because the

[239] FE CP16-480, Accession No. 20181214-3018 at 425.
[240] *Id.* at 131.
[241] *Id.* at 132.
[242] *See id.* (construction taking about four years); *id.*, DEIS vol. 2 at 61 (Appx. B, stating restoration will be deemed successful if 80% of vegetative cover restored).

CO10-66 We disagree. Wetland impacts from Project construction and operation are evaluated in section 4.4 of the EIS. Alternatives are evaluated in section 3.0, which includes a comparison of wetland impacts by alternatives where that information is available. Impacts from the non-jurisdictional supply pipeline are evaluated in cumulative impacts in section 4.13 of the EIS.

DEIS's assertion that wetland impacts will be mitigated to insignificance is unsupported, and because the DEIS almost entirely fails to account for impacts for the supply pipeline. CO10-66 Cont'd

A. The DEIS Fails to Consider Reasonable Facility Design and Siting Alternatives That Would Reduce Wetland Impacts CO10-67

As explained in Part III.B *supra*, the DEIS arbitrarily failed to consider alternatives that would wetland impacts by moving elements of the proposed facility out of wetlands or by reducing the size of the proposed facility. NEPA requires robust analysis of this alternative. 40 C.F.R. § 1502.14. The Clean Water Act also requires evaluation of alternatives that would reduce wetland impacts. 40 C.F.R. § 230.10(a). Although these two requirements are similar, *id.* § 230.10(a)(4), the Clean Water Act goes beyond NEPA's procedural requirements and imposes substantive obligations to actually adopt reasonable less damaging alternatives. 40 C.F.R. § 230.10(a). For example, where a project is not water dependent, the Clean Water Act imposes a presumption that an alternative that would not impact wetlands is available, and requires the applicant to provide "detailed, clear, and convincing information proving that an alternative with less adverse impact is impracticable." *Greater Yellowstone Coalition v. Flowers*, 359 F.3d 1257, 1269 (10th Cir. 2004).

Here, Annova has failed to make this showing.

In response to Sierra Club's argument, in its protest, that the Freeport and Cove Point projects suggest that relocating pretreatment or liquefaction facilities would be feasible, Annova simply asserted that the Freeport and Cove Point facilities were different, and that designs successfully employed in these projects could not be used here, without providing any evidence or specifics.[243] These unsupported assertions fall short of Annova's burden of providing "detailed,

[240] FE CP16-480, Accession No. 20160831-5379.

CO10-67 Section 3.4 of the EIS includes an evaluation of alternative LNG sites, including a comparison of NWI-mapped wetlands within each site. See also response to comment CO10-13.

clear, and convincing information proving that an alternative with less adverse impact is impracticable." *Flowers*, 359 F.3d at 1269. CO10-67 Cont'd

B. The DEIS Fails to Take a Hard Look at Mitigating Wetland Impacts CO10-68

Annova currently proposes to restore wetlands at Little San Martin Lake, 1.2 miles northwest of the project site, but the DEIS recognizes that Annova's Conceptual Mitigation Plan is still under review by the Corps.[244] It is difficult for the public to meaningfully comment on whether mitigation will be adequate or effective in the absence of a Corps-approved draft mitigation plan. Certainly, as discussed in more detail below, failure to discuss pipeline mitigation in the Conceptual Mitigation Plan makes it impossible to evaluate its effects. Nevertheless, one can still draw the conclusion that the DEIS fails to sufficiently evaluate mitigation measures to render impacts to wetlands insignificant.

1. The DEIS Arbitrarily Defers Discussion of Mitigation to Future Corps of Engineers Decisionmaking CO10-68

The DEIS concludes, in essence, that impacts to wetlands will be fully mitigated because the Army Corps of Engineers will require such mitigation as a condition of approval.[245] This conclusion is entirely unwarranted given what information is actually available. In fact, the DEIS concedes how insufficient the current state is:

- Annova has not finished collecting information on baseline conditions at the proposed mitigation site;
- Functional assessments of the wetlands at the terminal site have not been reviewed or finalized;
- Additional detailed engineering, design, construction, and monitoring information is required before Annova can finalize its proposed mitigation plan;

[244] FE CP16-480, Accession No. 20181214-3018 at 25, 134.
[245] FE CP16-480, Accession No. 20181214-3018 at 134.

CO10-68 Minimization measures are included in Annova's Procedures that would adequately address wetlands that are only temporarily affected by Project construction, such that impacts on temporally affected wetlands would be less than significant. As stated in section 4.4 of the EIS, it would be the responsibility of the COE as part of its review of the Section 404/Section 10 permit under the Clean Water Act, not the Commission, to determine the need for wetland mitigation and the adequacy of mitigation proposed by Annova, including consideration of the current conditions and the ownership or management of the mitigation area. We anticipate that if the COE issues a Section 404/Section 10 permit for the Project, it would be conditioned upon Project-related adverse impacts on wetlands and waters of the U.S. being effectively offset by mitigation similar to what Annova has identified in its draft Conceptual Mitigation Plan.

- The Corps has yet to determine the acceptability of any proposed compensatory mitigation for wetlands.[246] CO10-68 Cont'd

Moreover, NEPA prohibits passing the buck in this manner. Indeed, one of the purposes of this EIS is to inform the Corps' evaluation of this very issue. *See infra* Part IX.A, page 87 As the Environmental Protection Agency has already explained in the context of Rio Grande LNG's application, details regarding proposed mitigation need to be presented in a draft EIS, so that, *inter alia*, the public has a meaningful opportunity to review and comment.[247]

2. The DEIS Fails to Adequately Evaluate Wetlands Impacts Due to the Associated Supply Pipeline. CO10-69

The DEIS treats Annova's supply pipeline as non-jurisdictional, asserting that it would be a "yet undetermined third-party-owned and -operated intrastate pipeline."[248] Thus, the DEIS merely discusses it superficially in the summary of cumulative impacts.[249] But as Annova's 404 application makes clear, Annova is the owner and operator of the pipeline, and the pipeline is an integral and connected action to the terminal project. Further, as discussed in greater detail in part IX.B below, the supply pipeline would provide *interstate* service and would be subject to FERC's jurisdiction. Thus NEPA requires the full extent of its impacts to be evaluated.

Annova LNG will need an approximately 9-mile-long gas supply pipeline leading from the Valley Crossing Pipeline to the terminal. The pipeline will impact at least 110 acres, including over 42 acres of wetlands.[250] Additionally, the pipeline will have a permanent footprint of around 50 acres. Nowhere does the DEIS (or other documents, such as the Conceptual Mitigation Plan) CO10-70

[246] FE CP16-480, Accession No. 20181214-3018 at 134.
[247] See EPA, Comments to FERC submitted FERC Accession No. 20161115-5024; *available at https://elibrary.ferc.gov/IDMWS/common/openmat.asp?fileID=14395392* (hereinafter "EPA Comment"). The undersigned adopt these comments in full and incorporate them by reference.
[248] FE CP16-480, Accession No. 20181214-3018 at 47.
[249] FE CP16-480, Accession No. 20181214-3018 at 371.
[250] FE CP16-480, Accession No. 20181214-3018 at 371.

CO10-69 We disagree that the supply pipeline would be FERC jurisdictional. We address this non-jurisdictional facility in section 4.13 of the EIS under cumulative effects. The COE is evaluating the supply pipeline as part of its review of the Section 404/Section 10 permit application, which we assume will also include consideration of the need for mitigation for wetland impacts associated with the pipeline.

CO10-70 See response to Comment CO10-69.

disclose how many of the acres in the permanent right-of-way are wetlands—despite the project plan drawings submitted to the Corps showing wetlands within it.[251] It is not clear how long these wetlands will be disrupted during construction and restoration activities. It is also possible that these wetlands may be permanently degraded because restoration of vegetation can be imperfect, creating a risk of permanent degradation. Even if restoration is successful, wetlands within the operational right-of-way may be permanently and deliberately transformed: Annova LNG will presumably conduct vegetation maintenance within a 50-foot-wide permanent right-of-way. Given the lack of information regarding the pipeline, it is unsurprising that nothing in project documentation substantiates the assertion that the pipeline would have only temporary impacts to wetlands.[252] The failure to evaluate fully and adequately evaluate the impacts of the pipeline on wetlands, including considering alternatives with respect to siting the pipeline means that FERC has not taking the requisite "hard look" at the entirety of Annova's project. CO10-70 Cont'd

3. The Information in the DEIS Regarding Annova's Proposed Mitigation Is Insufficient CO10-71

The Corps, EPA, and other federal agencies have recognized "the longstanding national goal of 'no net loss' of wetland acreage and function." Compensatory Mitigation Rule, 73 Fed. Reg. 19,594 (Apr. 10, 2008). Mitigation must be of a kind and amount to compensate for the loss of services and functions provided by the impaired wetlands. 40 C.F.R. §§ 230.93(e), (f). Compensatory mitigation is inherently imperfect and therefore always requires a greater than 1:1 ratio. In this circumstance, the ratio must be further increased because of the temporal difference between when impacts will occur (*i.e.*, start of construction) and if/when the proposed mitigation actually becomes functional. 40 C.F.R. § 230.93(m), *accord* 73 Fed. Reg. at 19,610.

[251] *Id.* at 363.
[252] *Id.* at 380.

CO10-71 See response to Comments CO10-68 and CO10-69.

According to the DEIS, nearly 100 acres of wetlands in total will be impacted by the project (including the supply pipeline). As proposed, construction and operation of the terminal site and access road will permanently impact approximately 52.8 acres of wetlands with 4.9 more acres impacted temporarily (57.7 acres total).[253] An additional 42.1 acres will be disturbed or destroyed—at the very least in the short-term—by construction of the 9-mile-long pipeline.[254] Yet Annova proposes only to restore or enhance a total of 171-192 acres of estuarine wetlands through its work at the Little San Martin Mitigation Site.[255] This means Annova is proposing compensatory mitigation at a low ratio (ranging from 1.7:1 to 1.9:1). In contrast, the nearby SpaceX project mitigated at a greater than 10:1 ratio.[256] Annova's own mitigation plan acknowledges that its 50-acre re-establishment plan may not fully replace the Plant Biomass Production function at the proposed mitigation site.[257] Without more, Annova is not meeting its mitigation obligations and its application must be denied. CO10-71 Cont'd

Finally, the Conceptual Mitigation Plan appears to misrepresent the current conditions at Little San Martin Lake. The undated "Recent Aerial Photograph provided by Annova suggests that the marsh (and corresponding aquatic resources) is completely absent from the southwest section of the proposed mitigation site.[258] However, more recent Google Maps satellite imagery shows that this is not the case, depicting aquatic resources throughout almost the entirety of the proposed mitigation site, including the southwest corner.[259] Individuals from one of the undersigned groups (Save RGV from LNG) recently visited the proposed mitigation site and were CO10-72

[253] FE CP16-480, Accession No. 20181214-3018 at 132.
[254] FE CP16-480, Accession No. 20181214-3018 at 371.
[255] FE CP16-480, Accession No. 20181207-5060 at 9 (Annova Conceptual Mitigation Plan, Dec. 2018 at 6).
[256] SpaceX FEIS at 4-44, Appendix M, attached as Exhibit 66 *available at* https://cdxnodengn.epa.gov/cdx-enepa-II/public/action/eis/details/downloadEisDocuments?eisId=88519.
[257] FE CP16-480, Accession No. 20181207-5060 at 20 (Annova Conceptual Mitigation Plan, Dec. 2018 at 17).
[258] FE CP16-480, Accession No. 20181207-5060 at 10 (Annova Conceptual Mitigation Plan, Dec. 2018 at 7).
[259] *See* Exhibit 67 (picture from site visit depicting black mangrove).

CO10-72 Notwithstanding that the wetland mitigation plan is under review and jurisdiction of the COE and not the Commission (see response to Comment CO10-68), in an Environmental Information Request dated March 15, 2019, we asked Annova to respond to this comment and similar comments. In its response Annova maintains that the draft Conceptual Mitigation Plan accurately represents the wetland site conditions. See Annova's response on the Project docket in accession number 20190325-5179. Ultimately, the COE will make a determination regarding the acceptability of the wetland mitigation plan.

surprised to see more open water, more vegetation, and more black mangrove on the site than Annova's Conceptual Mitigation Plan represented.[260] Based on the available information, Annova is underrepresenting the existing wetlands at the proposed mitigation site, may be overestimating the restoration and enhancement of wetlands at the site. Without better verification of the baseline information for the aquatic resources on the proposed mitigation site, FERC cannot take the "hard look" at wetland impacts that NEPA requires. CO10-72 Cont'd

VIII. The DEIS Fails to Adequately Consider Reliability and Safety CO10-73

The DEIS recognizes potential impacts to and from the Project and the nearby SpaceX Commercial Spaceport Project, which is located approximately 6.3 miles southeast of the proposed Terminal and anticipates rocket launches starting as soon as this year. DEIS 4-91. The Annova Project Site would be located within the proposed SpaceX closure area, which is the area within the vicinity of the vertical launch area that is restricted on the day of a launch operation. *Id.* During its review, FERC staff concluded that there would be debris above a threshold of 3e-5 years, the failure rate level used to evaluate the potential for cascading damage and the failure rate used by FAA in space launch failure prior to 2017,[261] but that the cascading damage at the terminal site would not impact the public. DEIS 4-236. FERC staff concluded that rocket launch failures could impact onsite constructions workers and plant personnel. DEIS 4-237. The DEIS also states that the Coast Guard would determine any mitigation measures needed on a case-by-case basis to safeguard public health and welfare from LNG carrier operations during rocket launch activity.

[260] *See id.*
[261] 14 C.F.R. 417.107(b) was updated from 3e-5 casualties for three different events (in the 2016 edition) to 1e-4 casualties cumulative (in the 2017 edition). It is unclear why the 2016 regulation was applied to the DEIS.

CO10-73 We disagree that the discussion and analysis of risk posed by the SpaceX launch site on the Project is inadequate. Public portions of the ACTA report were submitted to the project docket on April 25, 2017, and supplemental data was submitted on August 22, 2017. The public information provided in these filings shows the debris impact probability contours for varying debri from both the Falcon 9 and Falcon Heavy rocket launch vehicles. The draft EIS provided the FERC staff's conclusions based on this analysis.

The discussion of the unique risks posed by the SpaceX launch site on Annova LNG's Terminal, and the cumulative risks posed to the public as a result of this launch site on the three currently proposed LNG terminals along the Brownsville Ship Channel, is grossly inadequate. The DEIS includes a mere two paragraphs discussing potential impacts from the SpaceX launch facility; does not reference, discuss, or incorporate the April 2017 ACTA Technical Report No. 17-1008/1-01 or any other SpaceX-related impacts analyses;[262] and includes only the SpaceX Final Environmental Impact Statement (2014), the 2013 FWS SpaceX Biological and Conference Opinion, and one other article on SpaceX's Boca Chica Launch Site (2014) as referenced articles in Appendix K-. As part of the impact analysis, Annova LNG must quantify risk from future space launch missions in accordance with 14 C.F.R. Parts 415 and 417. But no data is provided to demonstrate whether the public risk criteria in 14 C.F.R. § 417(b) is met for the total risk to the public (1e-4 cumulative), for any individual member of the public (1e-6 per launch), for water borne vessel (1e-5), or for aircrafts (1e-6). Given the fact that FERC staff concluded debris would occur above a regulatory threshold, the lack of further analysis or disclosure in the DEIS fails to satisfy the need to inform the public about serious impact risks. CO10-73 Cont'd

1. FERC Must Clarify the Basis for Its Potential Impacts Analysis and Its Discrepancy with ACTA's Conclusions CO10-74

FERC concluded that there would be debris above the threshold failure rate level used to evaluate the potential for cascading damage (*i.e.*, 3e-5 per year) but concluded that the cascading damage at the Terminal would not impact the public. DEIS 4-236. Annova LNG hired a consultant, ACTA, to provide information to FERC. ACTA concludes that under certain adverse

[262] *See* FERC Docket CP-16-480, Accession No. 20170425-5123 at App. A.

CO10-74 The impact probabilities are dependent on fragment velocity, mass, shape and size. The initial ACTA report provided impact probability contours for fragments above 10,000 foot-pounds kinetic energy. In response to FERC staff's information request, additional public contours (results of the analysis) were provided for fragments with kinetic energy thresholds of 11, 100, 1,000, 10,000, 100,000, and 1,000,000 foot-pounds. The kinetic energies relate to the potential for them to cause damage, including potential adverse impacts on people and potential damage to piping, pressure vessels, and reinforced concrete of a varying thicknesses. This information was used to assess the potential direct impact to persons onsite (i.e., construction workers and permanent plant personnel) and potential for cascading effects that could lead to releases. For any releases that could be triggered, hazard modeling was evaluated under varying conditions to determine whether there could be impacts offsite that could impact the public. The analyses indicated there would not be any significant risk to the offsite public. Specific information on what potential projectiles could result in damage and releases is considered as potential information that adversaries could use and therefore was categorized as Critical Energy Infrastructure Information (CEII) and would not be subject to public disclosure.

wind conditions, hazardous launch vehicle debris may impact the Terminal perimeter.[263] The public version of this report redacts the vehicle impact probabilities on a per-launch basis,[264] but the report's conclusions suggest that ACTA concluded the probability of debris impacting the Terminal was less than the FAA risk criteria in 14 C.F.R. Part 417. FERC filed an engineering information request related to this report,[265] but the response is not publicly available because it was filed as CEII. CO10-74 Cont'd

We request that FERC clarify the basis for its conclusion and explain any discrepancies between its independent review of possible impacts and that of ACTA/Annova LNG. We further request that FERC publicly disclose any correspondence or written review of ACTA's report that explain the bases for FERC's conclusions and are not already publicly available on the docket.

2. The Risk Assessment for Space Launch Failures Improperly Failed To Include the BFR CO10-75

A rocket launch failure impact analysis must include all launch vehicles that meet the threshold criteria for realness and relevance. Under NEPA, a rocket launch failure impact analysis should include review of all vehicles that could reasonably be foreseen to be launched at a site during the site's lifespan.

In a FERC Environmental Information request, FERC asked that the applicant analyze the impact analysis from potential future space launch missions, accounting for all future launch vehicle-series including the Falcon 9, Falcon Heavy, and Interplanetary Transport System launch vehicle.[266] In its response, Annova LNG stated that its contractor ACTA excluded the Interplanetary Transport System (ITS) and any other launch vehicles because SpaceX had not

[263] *Id.* at 23.
[264] *See id.* at 72-77.
[265] FERC Docket CP16-480, Accession No. 20170802-3005.
[266] FERC Docket CP16-480, Accession No. 20161027-3006 at 5.

CO10-75 Section 4.12.5.7 of the final EIS has been updated to indicate that the analysis is specific to both Falcon 9 and Falcon Heavy launch vehicles and not for conceptual launch vehicles such as the Big Falcon Rocket. FERC staff recommendations in section 4.12.6 have also been updated so that Annova must file procedures to conduct risk-based assessments that would incorporate the FAA's public guidance prior to a rocket launch. Since the risk assessments would incorporate the FAA's public guidance, the risk assessments would be based on the most up-to-date information about areas likely to be impacted by falling debris and would allow Annova to take any action such as reducing or stopping certain plant operations prior to a rocket launch.

proposed to launch any other existing or planned launch vehicles from the Boca Chica Spaceport as of the date of response.[267] The response also called into question whether ITS, the Big Falcon Rocket (BFR) / Big Falcon Spaceship (BFS), or other vehicles were viable or sufficiently real for purposes of the analysis required for the Terminal. CO10-75

However, announcements by SpaceX representatives over the past 20 months make clear that the BFR[268] is sufficiently real and relevant for purposes of impacts analysis for the three proposed Brownsville LNG terminals. For example:

- CEO Elon Musk has stated that SpaceX is "no longer planning to upgrade Falcon 9 second stage for reusability" because the company is "[a]ccelerating BFR instead."[269]
- At the 2017 International Astronautical Federation conference, Musk stated that SpaceX is aiming to conduct two uncrewed missions to Mars by 2022 and a crewed mission around the moon and back in 2023.
- Following this conference, a series of public comments have made clear that the Boca Chica rocket facility will be almost exclusively dedicated to testing BFR's spaceship prototypes.[270]
- CEO Musk stated that spaceship hop testing would "most likely . . . happen at our Brownsville location," perhaps as early as 2019.[271] SpaceX President/COO Gwynne Shotwell has stated that she believed BFR could begin its first orbital test missions as early as 2020.[272]
- In January 2018, at the TAMEST Annual Conference, Shotwell stated that the Boca Chica facility would be used for "early vehicle testing" and then would move from a "test site to a launch site."[273]

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[267] FERC Docket CP-16-480, Accession No. 20170425-5123 at 11.
[268] CEO Elon Musk has stated that the BFR will be called the "Starship," and the first stage will be named the "Super Heavy," but we will refer to the rocket as BFR in these comments.
[269] Elon Musk, https://twitter.com/elonmusk/status/1063865779156729857 (Nov. 17, 2018), attached as Exhibit 68.
[270] *See* Teslarati, "SpaceX Mars rocket test site receives first huge rocket propellant storage tank" (July 12, 2018), attached as Exhibit 69.
[271] *Id.*
[272] *Id.*
[273] Gwynne Shotwell, TAMEST 2018 Annual Conference: Aerospace, https://www.youtube.com/watch?time_continue=303&v=kjTHJzWPTnU.

- In July of this year, SpaceX delivered a 100,000-gallon liquid oxygen tank to its prospective Boca Chica test and launch facility. In a statement provided to the *Valley Morning Star*, SpaceX spokesperson Sean Pitt confirmed that the tank had been delivered to Boca Chica as part of an ongoing effort to ready the site for testing and launches of an unspecified "vehicle."[274] CO10-75

- SpaceX has recently filed for permits and licenses that will eventually allow the company to legally conduct hop and flight tests of a BFR spaceship prototype at the Boca Chica site.[275] These applications are not public, but FCC's Experimental Licensing System has published a summary of the SpaceX request to test these vehicles in the near future.

- In September 2018, Musk announced that the spacecraft will be 387 feet tall (118 meters), SpaceX's largest rocket to date. This is 157 feet taller than the Falcon Heavy and twice as powerful.[276] This announcement also included a series of design images. The BFR's booster will be lifted by 31 Raptor engines that produce a thrust of approximately 5,400 tons.[277] Musk stated that there would not be many big changes to the booster going forward.[278]

- In January 2019, SpaceX announced its decision to both build and test the Starship prototypes at the Boca Chica facility and stated that the first of these tests could occur as soon as February or March of 2019.[279] SpaceX has already completed assembly of a prototype of the Starship hopper vehicle at this facility.[280]

This available information paints a reasonably clear picture: SpaceX is prioritizing the development and testing of the BFR; the BFR is significantly bigger and more powerful than the Falcon boosters; and SpaceX is moving forward to test (and most believe launch)[281] the BFR at the Boca Chica site. It is reasonable to conclude that BFR may, and likely will, be launched from

[274] *See* Teslarati, "SpaceX Mars rocket test site receives first huge rocket propellant storage tank" (July 12, 2018), attached as Exhibit 69.
[275] Teslarati, "SpaceX seeks licenses for BFR spaceship prototype hop test campaign" (Nov. 22, 2018), attached as Exhibit 70.
[276] *See* https://www.spacex.com/mars (describing height and rocket capability); Exhibit 71 (SpaceX, "Making Life Multiplanetary" (2017)).
[277] Exhibit 71 (SpaceX, "Making Life Multiplanetary (Transcript)" (2017)).
[278] Space.com, "The New BFR" (Sept. 21, 2018), attached as Exhibit 72 and available at https://www.space.com/41901-spacex-bfr-mars-spaceship-rocket-design-changes.html.
[279] L.A. Times, "In blow to Los Angeles, SpaceX is moving some Mars spaceship and booster work to Texas" (Jan. 16, 2019), attached as Exhibit 73.
[280] *Id.*
[281] *See generally* Nasa Spaceflight, "Where will BFR launch from first?", attached as Exhibit 74 and available at https://forum.nasaspaceflight.com/index.php?topic=44168.0.

the Boca Chica site during Annova LNG's life.

CO10-75 Cont'd

Under NEPA's reasonably foreseeable standard approach, an analysis of potential impacts to the Annova LNG Terminal should include potential impacts from the BFR due to the spaceship's realness and relevance. FERC should coordinate with the FAA and an independent third-party contractor to get the latest information available regarding the BFR and should undertake a quantitative risk analysis in accordance with 14 CFR Parts 415 and 417. This is particularly true in light of FERC's conclusion that the much smaller and less powerful Falcon vehicles could cause debris above the regulatory threshold at the Annova LNG Terminal site.

3. The DEIS Provides Insufficient Information Regarding Debris Impacts to the Brownsville Ship Channel CO10-76

The DEIS states that the Coast Guard would determine any mitigation measures needed on a case-by-case basis to safeguard the public health and welfare from LNG carrier operations during rocket launch activity. DEIS 4-236. No further information is provided regarding potential impacts to the Brownsville Ship Channel (BSC) or the public as a result of these activities.

The SpaceX facility is closer to portions of the BSC than to the Terminal site. If debris is expected at the Terminal site (and to the onsite workers and plant personnel), debris may impact LNG carrier operations and pose a risk to the public safety. No quantification of this risk is provided in the DEIS in accordance with 14 C.F.R. § 417.107(b)(3) or otherwise. No proposed mitigation is provided to reduce this risk and no assurance is given that the Coast Guard will require Annova LNG to otherwise mitigate these risks.

By letter dated February 13, 2018, the United States Coast Guard issued its Letter of Recommendation pursuant to 33 C.F.R. 127.009 concluding that the BSC be considered suitable

CO10-76 As noted in the Coast Guard's Letter of Recommendation Analysis, FERC staff and Coast Guard did discuss space rocket launch operations and potential impacts on LNG marine vessels. These discussions were based on FERC staff analysis of the two public ACTA submittals filed on April 25, 2017, and August 22, 2017. As noted in the comment, the Coast Guard would assess with LNG marine vessel transit on a case-by-case basis to determine if any safety and security measures are necessary.

for LNG marine traffic.[282] The Coast Guard reviewed the Waterway Suitability Assessment for the Annova LNG Project that was submitted on May 24, 2016. CO10-76

It is unclear if this review included information provided subsequent to Annova LNG's Letter of Intent, including ACTA's analysis of impacts from SpaceX. However, the Letter of Recommendation's Analysis did include a short description of the SpaceX launch site. This analysis concluded that based on FERC assumptions, FERC staff "found that the risk of public impact from a projectile in the 10,000 to 100,000 ft-lb range would be just inside the tolerable region (*i.e.*, within the [As Low As Reasonably Practicable] region) after accounting for 10% probability factor for wind."[283]

FERC should confirm that its staff provided the most recent information available to the Coast Guard during its review of the Waterway Suitability Assessment. FERC should also clarify the failure probability and public risk to LNG carrier operations during rocket launches, as well as any proposed mitigation and assurances provided by Annova LNG to reduce these risks.

B. The DEIS' Reliability and Safety Analysis Is Incomplete and Fails to Account for All Reasonably Foreseeable Infrastructure CO10-77

LNG facilities handle flammable and sometimes toxic materials that can pose a significant risk to the general public. In fact, a number of incidents, some of which are described in the DEIS, have occurred involving LNG carrier accidents or U.S. LNG facilities. *See* DEIS 4-197 – 199; 4-207 – 208. Most recently, in 2014, an explosion at the Plymouth LNG facility caused the failure of pressurized equipment, resulting in high velocity projectiles. Members of the scientific community have criticized LNG terminal safe-siting policy as faulty,[284] and we incorporate those

[282] FERC Docket CP16-480, Accession No. 20180307-3058.
[283] *Id.* at 8.
[284] *See, e.g.*, Havens, Jerry & James Venart, "United States LNG Terminal Safe-Siting Policy is Faulty," FERC 20150114-5038, attached as Exhibit 75.

CO10-77 This comment references comments submitted under accession number 20150114-5038 that are addressed in the final EIS issued under Docket Number CP13-483-000 (see accession number 20150930-4002, Appendix W Part 7). In addition, section 4.12.2 discusses the August 2018 MOU between DOT PHMSA and FERC. Under this MOU, the DOT PHMSA would issue a Letter of Determination after reviewing Annova's hazard analysis and modeling results. Section 4.12.3.1 indicates that major LNG marine vessel accidents have not resulted in injury to the public and have resulted in minimal loss of LNG for incidents involving loading or unloading operations and no loss of LNG after a grounding or collision event. Section 4.12.5.1 discusses why the 1944 release incident in Cleveland, Ohio resulted in public impacts and also states that subsequent major incidents (including the 2014 incident at the Plymouth LNG facility that is referenced in the comment) have not impacted the public.

concerns in these comments. CO10-77

C. The DEIS Should Not Be Issued Until the DOT Issued Its Letter of Determination CO10-78

The DEIS fails to adequately analyze and disclose potential reliability and safety information for the Annova LNG Terminal site. As the DEIS notes, on August 31, 2018, the DOT and FERC signed an MOU regarding coordination and responsibility throughout the LNG permit application process for FERC-jurisdictional LNG facilities.[285] In the MOU, the DOT agreed to issue a Letter of Determination (LOD) stating whether a proposed LNG facility would be capable of complying with location criteria and design standards contained in Subpart B of Part 193. FERC also committed to rely upon the DOT determination in conducting its review of whether the facilities would be in the public interest, although the issuance of an LOD does not abrogate responsibility over continued compliance with Part 193. The MOU was effective upon signing by the agencies.

As the DEIS acknowledges, a LOD has not been issued by the DOT for the Annova LNG Project because the DOT has not completed its analysis of whether the proposed facilities would meet the DOT's siting standards. DEIS 4-197. The latest filings in the FERC docket shows that the U.S. Pipeline and Hazardous Materials Safety Administration requested information related to its evaluation of compliance with the siting requirements on August 14, 2018..[286] CO10-79

The public should have the opportunity to review the most recent Design Spill Package documentation, final Hazard Analysis Report(s), all up-to-date supplemental documentation related to compliance with the Subpart B regulations, any correspondence between the DOT and

[285] "Memoranda of Understanding (MOU), Federal Energy Regulatory Commission, accessed November 26, 2018, attached as Exhibit 76 and available at https://www.ferc.gov/legal/mou/2018/FERC-PHMSA-MOU.pdf.
[286] FERC Docket CP16-480, Accession No. 20180823-5148.

CO10-78 As part of DOT PHMSA's LOD process, Annova has submitted numerous responses to DOT PHMSA's information requests on the FERC docket. Based on its review of this information, DOT PHMSA issued its Letter of Determination on March 20, 2019.

CO10-79 The August 2018 MOU between DOT PHMSA and FERC does not require DOT PHMSA's LOD to be issued prior to the draft EIS. Annova has filed in the Project docket numerous filings in response to DOT PHMSA information requests. Certain information is filed as public information and is available for the public to review. In addition, as indicated in section 4.12.5.2 of the EIS, FERC conducted a engineering review on the use of various layers of protection or safeguards to reduce risks of potential hazards to offsite public. FERC also reviewed potential impacts from natural hazards and external impacts from the surrounding areas. This review focuses on the safe and reliable operation of the site.

the applicant, and the LOD itself prior to the issuance of a decision. These are materials and necessary authorizations that should be included in the DEIS. FERC staff should undertake their responsibilities in accordance with the 2018 MOU and issue a complete DEIS (or supplemental document) upon receipt of the LOD. CO10-79

IX. The DEIS Fails to Adequately Address Connected, Indirect, and Cumulative Actions, Including Production and Use of the Exported Gas CO10-80

Authorization of the Annova project will have foreseeable indirect effects on the price, production, and use of natural gas in the United States. Because NEPA requires an agency to engage in a wide-ranging inquiry, including connected actions, indirect effects, and other foreseeable consequences, FERC must consider these impacts in its EIS.

A. The EIS Must Address the Impacts of Cooperating Agencies' Decisions, Including the Impacts of Additional Natural Gas Production and Use CO10-81

Although the DEIS recognizes that FERC received scoping comments calling for analysis of the effects of "induced natural gas production or increased hydraulic fracturing," DEIS 1-13, the DEIS provides no discussion of these issues, nor any explanation as to why these issues are out of scope. NEPA requires FERC to consider these and other indirect effects relating to the entire natural gas lifecycle.

In other proceedings, FERC has argued that these effects are outside the scope of FERC's NEPA review because they are instead effects of other state and federal agency actions, such as the Department of Energy export authorization. However, FERC is not exempt from including indirect environmental impacts simply because local or state agencies have control over much of the relevant regulatory process. FERC's potential authorization of the Project would be a cause of increases in gas production and use notwithstanding the fact that other government entities also

CO10-80 We disagree. The possible impact of the Project on price, production, and use of natural gas in the United States are not part of the scope of the EIS.

CO10-81 As discussed in section 1.3 of the FEIS, production, extraction, and end-use of natural gas are not part of the proposed action evaluated in the EIS. Speculation on whether the export of natural gas would result in increased natural gas production is outside the scope of the EIS. Gas used for export can come from several existing production areas. Although environmental and economic models do exist to estimate market changes based upon gas flows into and out of markets, ultimately this type of analysis is outside of the scope for this EIS. Our analysis of cumulative impacts of the Project, including air quality and climate change impacts, is included in section 4.13.2 of the EIS.

Similarly, the effects of LNG combustion in end-use/importing markets are outside of the scope of this EIS. Additionally, the DC Circuit court held in Sierra Club v. FERC (No. 14-1249) and Sierra Club and Galveston Baykeeper v. FERC (No. 14-1275) that FERC's NEPA environmental review do not include indirect impacts resulting from increased natural gas exports, such as increased natural gas production. In addition, it held that the DOE, not FERC, has responsibility as the agency that approves export of the commodity.

regulate these effects. NEPA would "wither away in disuse, [if] applied only to those environmental issues wholly unregulated by any other federal, state or regional body."[287] CO10-81

Nor does the Department of Energy's role in approving gas exports relieve FERC of the obligation to address the impacts of gas production and use in the EIS. Commenters recognize that the D.C. Circuit has held that the Department of Energy's approval of exports, rather than FERC's approval of the construction and operation of export infrastructure, is the "legally relevant cause," for purposes of NEPA review, of indirect effects on gas production and use. *Sierra Club v. FERC*, 827 F.3d 36, 47-49 (D.C. Cir. 2016) ("*Freeport I*") (citing *Department of Transp. v. Public Citizen*, 541 U.S. 752, 764, 771 (2004)). However, *Freeport I* explicitly declined to address "the interplay between the Commission and the Department of Energy when the former is acting as the 'lead agency' in reviewing the environmental effects of a natural gas export operation under NEPA," whether FERC's decision to exclude gas production from its EIS "impermissibly 'segmented' its review of the [terminal] Projects from the larger inter-agency export authorization process," or whether "Commission's construction authorizations and the Department's export authorizations qualified as 'connected actions' for purposes of NEPA review." *Id.* at 45-46. The Court could not have been clearer about the fact that *Freeport I* did not resolve these issues: "Before addressing the merits of the Associations' NEPA claim, we pause to underscore what *we are not deciding in this case*." *Id.* at 45 (emphasis added). No subsequent case addressing LNG exports has discussed these issues.

Consideration of these issues left undecided by *Freeport I* and its progeny plainly demonstrates that the Department's authorization of exports *is* a "connected action," which must be fully analyzed in the terminal EIS. 40 C.F.R. § 1508.25(a)(1). According to NEPA's binding

[287] *Calvert Cliffs' Coordinating Comm., Inc. v. U.S. Atomic Energy Comm'n*, 449 F.2d 1109, 1122-23 (D.C. Cir. 1971).

regulations: CO10-81 Cont'd

> Actions are connected if they:
>
> (i) Automatically trigger other actions which may require environmental impact statements.
>
> (ii) Cannot or will not proceed unless other actions are taken previously or simultaneously.
>
> (iii) Are interdependent parts of a larger action and depend on the larger action for their justification.

Id. "The point of the connected actions doctrine is to prevent the government from 'segmenting' its own 'federal actions into separate projects and thereby failing to address the true scope and impact of the activities that should be under consideration.'" *Big Bend Conservation All. v. FERC*, 896 F.3d 418, 423–24 (D.C. Cir. 2018) (quoting *Sierra Club v. U.S. Army Corps of Eng'rs*, 803 F.3d 31, 49–50 (D.C. Cir. 2015) and *Del. Riverkeeper Network v. FERC*, 753 F.3d 1304, 1313 (D.C. Cir. 2014)).

It is clear that the decisions of cooperating agencies identified in part 1.2 of the DEIS, and the Department of Energy's anticipated review of non-free trade agreement export application in particular, *are* connected actions, the consequences of which must be fully considered in *this* EIS. 40 C.F.R. § 1508.25(a)(1). By refusing to consider the impacts of connected actions, FERC impermissibly segments NEPA review. *Delaware Riverkeeper Network v. FERC*, 753 F.3d 1304, 1313 (D.C. Cir. 2014). The proposed exports cannot proceed without construction and operation of the terminal and pipeline, and the various projects depend on one another for their justifications. 40 C.F.R. § 1508.25(a)(1)(ii)-(iii). The Department's evaluation of the expected application to export LNG to non-free-trade-agreement countries is an action that "may require [an] environmental impact statement[];" *id.* § 1508.25(a)(1)(i); indeed, the Department has already concluded that "[a]pprovals or disapprovals of authorizations to import or export natural CO10-82

CO10-82 Section 1.2 of the EIS identifies the cooperating agencies participating in development of the EIS and each agency's permit reviews or administrative actions applicable to the Project. Section 1.2 also identifies agency actions that may require NEPA and which agencies may choose to utilize this EIS to support other agency actions.

gas" involving construction or significant modification of export facilities, or even a "major increase in the quantity of [LNG] imported or exported" from existing facilities, will "normally require [an] EIS." 10 C.F.R. Pt. 1021 Subpt., D App. D, D8-D9. CO10-82 Cont'd

The connection between FERC's decision and the Department's is made particularly clear by the Energy Policy Act of 2005, which, in FERC's own words, "amended the Natural Gas Act to require [FERC] to coordinate the environmental review and the processing of all federal authorizations relating to proposals for natural gas infrastructure under FERC's jurisdiction."[288] *See also Freeport I*, 827 F.3d at 41 (discussing 15 U.S.C. § 717n(b)(1), 42 U.S.C. § 7172(a)(2)(B)). Because Congress has instructed FERC to prepare the EIS the Department of Energy and other cooperating agencies will use in satisfying their NEPA obligations, FERC cannot reasonably contend that this EIS need not include the effects of these other agencies' actions.

B. The Proposed Feed Gas Pipeline Is FERC Jurisdictional and A Connected Action CO10-83

Annova plans to receive gas from a 9 mile long, 36 inch diameter gas supply lateral. DEIS 1-13. The DEIS asserts that this lateral would be "non-jurisdictional," *i.e.*, not subject to FERC's Natural Gas Act section 7 authority, because it would be an "intrastate" pipeline. *Id.* This assertion is refuted by Annova's own statement that it plans to source gas from "the entire national gas pipeline grid," which would mean this pipeline would provide interstate service.[289]

Where gas "crosses a state line *at any time* from its production at the wellhead to its

[288] Federal Energy Regulatory Commission, Guidance for Federal and State Agencies for the Processing of Federal Authorizations in Cooperation with the FERC, 1, attached as Exhibit 77 and available at https://www.ferc.gov/industries/gas/enviro/epact-gas-guidance.pdf.
[289] Attached as Exhibit 78, available at https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2014/orders/ord3394.pdf at 4.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 90*

CO10-83 We disagree. The supply pipeline is a non-jurisdictional facility and need only be addressed in the cumulative impacts section of the EIS.

consumption at the burner tip," that gas is in interstate service. *Associated Gas Distributors v. FERC*, 899 F.2d 1250, 1255 (D.C. Cir. 1990) (citing *California v. Lo–Vaca Gathering Co.*, 379 U.S. 366, 369 (1965)) (emphasis added). A pipeline built to transport such gas is therefore a pipeline in interstate service, and subject to FERC jurisdiction under section 7 of the Natural Gas Act. CO10-83 Cont'd

Alternatively, if FERC concludes that feed gas for the project will in fact all be produced in Texas, and therefore not be transported interstate, then this conclusion simplifies the analysis of the indirect effects of such gas production, and FERC cannot claim that it cannot foresee where such production will occur. FERC cannot, however, simultaneously conclude that the feed pipeline will be in purely intrastate serve and that FERC cannot reasonably foresee the source of the gas that will supply the project.

C. The Effects of Increased Gas Production and Use Are Reasonably Foreseeable CO10-84

If Annova's project enters operation, this will foreseeably increase gas production and use. These impacts are therefore reasonably foreseeable indirect effects of both the FERC and Department of Energy actions, which must be considered in the NEPA analysis.[290] Indirect effects are "caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable."[291] An effect is reasonably foreseeable if it is "sufficiently likely to occur that a person of ordinary prudence would take it into account in reaching a decision."[292] Indirect effects encompass both "growth inducing" and "economic" effects, including "induced changes in the pattern of land use, population density or growth rate."[293] The indirect effects inquiry is

[290] 40 C.F.R. § 1508.8(b).
[291] *Id.*
[292] *Mid States Coal. for Progress v. Surface Transp. Bd.*, 345 F.3d 520, 549 (8th Cir. 2003) (quotations omitted).
[293] 40 C.F.R. § 1508.8(b).

CO10-84 Section 4.13.3.9 includes a discussion of the Project's contribution towards climate change. Review of the Project is limited to the economic and environmental impacts of the proposal before the Commission; therefore, the effects of LNG combustion in end-use/importing markets are outside of the scope of this EIS.

therefore wide-ranging in its scope.

CO10-84 Cont'd

The courts have consistently required that agencies extend their analyses to include effects similar to those ignored here by FERC. Where a new runway will foreseeably induce additional air traffic, the agency must assess the impacts of that traffic.[294] Where a railway would reduce the cost of delivered coal, the agency must address the foreseeable possibility of an increase in coal consumption and the effects thereof.[295] And in approving a port and causeway providing access to a previously isolated island, the agency was required to consider the effects of foreseeably induced "industrial development" thereon.[296]

Here, it is clear that exports from the proposed terminal will result in an increase in gas production, processing, and transportation—the exported gas will have to come from somewhere. It is likely that FERC can foresee where, on a regional basis, this additional production will occur (indeed, the DEIS's assertion that the feed gas pipeline will be in intrastate service implies the belief that this additional production will occur entirely within Texas). Many of the impacts of additional gas production and associated activity can be evaluated at such a regional level. But even if the site of induced activity was entirely unknowable, FERC would still be able to meaningfully discuss the extent of climate impacts and the nature of non-climate effects. We discuss these issues in turn below.

CO10-85

1. Exporting LNG Will Increase Gas Production

The Energy Information Administration, Environmental Protection Agency, Department of Energy, and every private consultant that has considered the issue has concluded that increasing LNG exports will lead to increased gas production. These entities have provided

[294] *Barnes v. U.S. Dep't of Transp.*, 655 F.3d 1124, 1138-39 (9th Cir. 2011).
[295] *Mid States*, 345 F.3d at 549-50.
[296] *Sierra Club v. Marsh*, 769 F.2d 868, 878-79 (1st Cir. 1985).

CO10-85 Whether or not the Project would result in an increase in natural gas production is beyond the scope of the EIS.

CO10-86 See response to comment CO10-85.

predictions of the amount by which a given volume of exports, from a specific location or locations, will increase gas production in an individual state or gas basin. *See, e.g.*, ICF International, U.S. LNG Exports: Impacts on Energy Markets and the Economy at 18 (May 15, 2013) (explaining that ICF's model predicts production in individual basins),[297] ICF International, U.S. LNG Exports: State-Level Impacts on Energy Markets and the Economy, at 15 (Nov. 13, 2013) (showing state-level increases in gas production in response to specific export volumes).[298] Another consultant has modeled how gas production in individual shale plays will respond to exports from an individual facility.[299] CO10-85

Similarly, the Energy Information Administration has repeatedly studied how U.S. energy markets will respond to LNG exports, predicting the amount by which gas production is expected to increase in response to a given volume of exports in various scenarios.[300] In preparing this report, EIA predicted how different export scenarios would increase gas production in individual subregions (*e.g.*, Gulf Coast, Southwest).[301] Moreover, the tool EIA used to prepare this analysis—the National Energy Modeling System—is routinely used to provide more fine-grained analysis, estimating changes in production in individual gas plays. *See* Energy Information Administration, Annual Energy Outlook 2018, at 68 (Feb. 6, 2018)[302] (discussing individual CO10-86

[297] Attached as Exhibit 79, available at https://www.api.org/~/media/Files/Policy/LNG-Exports/API-LNG-Export-Report-by-ICF.pdf.
[298] Attached as Exhibit 79, available at https://www.api.org/~/media/Files/Policy/LNG-Exports/API-State-Level-LNG-Export-Report-by-ICF.pdf
[299] Deloitte Marketpoint, Analysis of the Economic Impact of LNG Exports from the United States, at 8, 14, attached as Exhibit 80; initially filed as Excelerate Liquefaction Solutions I, LLC, FE Docket 12-146-LNG, Application for Non-FTA Export Authorization, Appendix F (Oct. 5, 2012), available at https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2012/applications/12_146_lng_nfta.pdf.
[300] *See* Energy Information Administration, Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets, 12 (October 2014), attached as Exhibit 81, available at https://www.eia.gov/analysis/requests/fe/pdf/lng.pdf.
[301] See Exhibit 82, available at (select Publication: "Effect of Increased Natural Gas Exports on Domestic Energy Markets" and Table: "Lower 48 Natural Gas Production and Wellhead Prices by Supply Region").
[302] Attached as Exhibit 83, available at https://www.eia.gov/outlooks/aeo/pdf/AEO2018.pdf.

predictions regarding gas production Eagle Ford, Haynesville, Permian, Utica, and Marcellus plays); Energy Information Administration, Oil and Gas Supply Module of the National Energy Modeling System: Model Documentation 2018, at 9 (June 2018) (explaining that NEMS is a "play-level model").[303] No agency has ever disputed that EIA's tools can be used to provide reasonable forecasts of how LNG exports from particular sites will increase gas production in individual gas plays. CO10-86 Cont'd

2. The Environmental Impacts of Increased Gas Production, Processing, and Transport are Reasonably Foreseeable CO10-87

The environmental impacts of export-induced gas production are also reasonably foreseeable.

First, the models discussed in the preceding section can reasonably foresee the volume and source of production that would be induced by this individual Project, or by LNG exports cumulatively.

Second, analysis of the climate impacts of additional gas production does not depend on knowing the specific locations where gas production and other activities will occur.[304]

Third, other impacts also occur at the regional level, and can be meaningfully forecast on the basis of basin- or play-level predictions of gas production, precisely the types of forecasts discussed in the previous section. Most importantly, FERC can foresee how regional increases in gas production will impact regional ozone levels (both in the region where the increase occurs *and in surrounding regions*). Ground-level ozone is formed by the interaction of volatile organic

[303] Attached as Exhibit 84, available at https://www.eia.gov/outlooks/aeo/nems/documentation/ogsm/pdf/m063(2018).pdf.

[304] *See* Department of Energy, *Addendum to Environmental Review Documents Concerning Exports of Natural Gas from the United States*, at 2 (August 15, 2014) ("*With the exception of greenhouse gases (GHG) and climate change*, potential impacts of expanded natural gas production and transport would be on a local or regional level.") (emphasis added), attached as Exhibit 85, available at https://www.energy.gov/sites/prod/files/2014/08/f18/Addendum.pdf.

CO10-87 See response to comment CO10-85.

chemicals and nitrogen oxides, and has serious impacts on human health and the environment. EPA has explained that ozone formation and impacts often occur "on a regional scale (*i.e.*, thousands of kilometers)." 76 Fed. Reg. 48,208, 48,222 (Aug. 8, 2011). In some regions, gas production is the primary contributor to ozone levels that violate EPA's national ambient air quality standards.[305] CO10-87

Available models, including the Comprehensive Air-quality Model with extensions ("CAMx"), can predict how an increase in gas production in an individual gas play will affect ozone levels in neighboring regions. One study used this tool to predict that increasing gas development in the Haynesville Shale would significantly impact ozone throughout east Texas/west Louisiana region.[306] Nothing indicates that it would be infeasible or exorbitantly expensive to perform similar modeling here. 40 C.F.R. § 1502.22(a). To the contrary, the Bureau of Land Management has performed a similar CAMx analysis to evaluate how gas development on federal land would affect ozone in surrounding regions, as part of NEPA review for a land management plan revision.[307] Similarly, EPA demonstrated that it was feasible to model the impact a new rule regarding major sources of air pollution would have on individual ozone regions nationwide. EPA, *Regulatory Impact Analysis for the Federal Implementation Plans to Reduce Interstate Transport* at 60-61 (June 2011).[308]

Finally, even for impacts that are local in nature, uncertainty as to the specific locations where incremental gas production will occur does not permit FERC to ignore the impact entirely. Even if the precise "*extent*" of these effects is not reasonably foreseeable, the "*nature*" of these

[305] Department of Energy, *Addendum* at 28.
[306] Susan Kemball-Cook, *et al.*, *Ozone Impacts of Natural Gas Development in the Haynesville Shale*, 44 Envtl. Sci. & Tech. 9357, 9360-61 (2010), DOI: 10.1021/es1021137, attached as Exhibit 86.
[307] Bureau of Land Management, Continental Divide-Creston Natural Gas Development Project EIS, Air Quality Technical Support Document (Apr. 15, 2016), attached as Exhibit 87, available at https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=dispatchToPatternPage&currentPageId=77531.
[308] Attached as Exhibit 88, available at https://www3.epa.gov/crossstaterule/pdfs/FinalRIA.pdf.

effects is, and as such, FERC "may not simply ignore the effect."[309] For example, in *Mid States*, the court ruled that an agency must address the foreseeable possibility of an increase in coal consumption and the effects thereof, due to the construction of a railway reducing the cost of delivered coal.[310] An agency may not ignore "the construction of additional [coal-fired] power plants" that may result merely because the agency does not "know where those plants will be built, and how much coal these new unnamed power plants would use."[311] Thus, FERC must disclose, *in the EIS*, the fact and nature of these foreseeable effects of gas production that will be induced by the Project. CO10-87 Cont'd

3. Increasing LNG Expots Will Increase Overseas Gas Use CO10-88

The Project will also have foreseeable indirect effects resulting from the shipping, regasification, and use of exported LNG. Each of these activities will emit foreseeable amounts of greenhouse gases. The Department of Energy has already demonstrated that it is possible to quantitatively estimate emissions from use of LNG for electricity generation, and other published literature estimates emissions from other foreseeable uses of LNG.[312]

These emissions are foreseeable, and must be disclosed, even if FERC is unsure as to how foreign energy markets as a whole will balance in response to exported LNG. FERC cannot justify its failure to take a hard look at foreseeable emissions resulting from burning LNG exported via the Projects by speculating that other, more attenuated fuel substitution, might provide an unknown degree of mitigation. Recent peer reviewed research concludes that US LNG exports are likely to play only a limited role in displacing foreign use of coal, and such that US

[309] *Mid States*, 345 F.3d at 549.
[310] *Id.*
[311] *Id.*
[312] Gilbert, A. Q. & Sovacool, B. K., "US liquefied natural gas (LNG) exports: Boom or bust for the global climate?," Energy, Volume 141, December 15, 2017, pp. 1671-1680. https://doi.org/10.1016/j.energy.2017.11.098, attached as Exhibit 89.

CO10-88 Whether or not the Project would result in an increase in overseas natural gas use is beyond the scope of the EIS.

LNG exports are likely to increase net global GHG emissions.[313] This recent research was not before the agencies in *Freeport II*, 867 F.3d at 202, and demonstrates that there are now tools to perform a more careful and informative analysis than was done in that case. CO10-88

D. DOE's Prior Analyses of Indirect Effects Are Insufficient CO10-89

Although DOE previously published several general environmental reports regarding the impacts of natural gas production and the life-cycle greenhouse gas impact of U.S. LNG exports, these prior studies do not provide the hard look at indirect impacts NEPA requires here.

First of all, NEPA, requires that discussion of environmental impacts be provided *in the EIS*. Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, 46 Fed. Reg. 18026, 18034 (Mar. 23, 1981). The propriety of DOE's past reliance on these non-NEPA materials is another issue that the D.C. Circuit has explicitly declined to uphold, instead concluding that the issue was not before it. *Freeport II*, 867 F.3d at 197.

Moreover, these materials are out of date, and do not reflect the enormous amount of research regarding the impacts of gas production that has been published since they were issued. Physicians, Scientists, and Engineers for Healthy Energy maintains a database of peer-reviewed literature regarding the environmental and public health impacts of shale and tight gas production, the Repository for Oil and Gas Energy Research.[314] This database identifies 1,548 publications dated after August, 2014.[315] FERC cannot rely on material DOE published in 2014, years before the pending applications were even submitted, without taking a hard look at whether that material continues to constitute "high quality information," 40 C.F.R. § 1500.1(b) and provide "full and fair discussion of significant environmental impacts," 40 C.F.R. § 1502.1.

[313] *See, e.g.*, Gilbert et al. 2017, *supra* note 312.
[314] https://www.psehealthyenergy.org/our-work/shale-gas-research-library/
[315] https://www.zotero.org/groups/248773/pse_study_citation_database/items/order/dateModified/sort/desc (last visited Nov. 30, 2018).

CO10-89 The adequacy and scope of previous reviews by DOE are beyond the scope of the EIS.

One example of how DOE's 2014 materials no longer represent the scientific consensus is that recent data indicates much higher greenhouse gas emission rates for gas production. These materials assert that 1.3 and 1.4 percent of extracted gas is released as methane between the well and liquefaction facility.[316] This estimate was based on "bottom-up" methodology, which aggregated measurements of emissions from individual components—*e.g.*, measurement of an individual pneumatic controller. Even at the time these reports were published, "top-down" studies, which measure total changes in atmospheric methane concentrations around gas production sites, indicated that these figures were a gross underestimate of total emissions.[317] More recent and more thorough bottom up studies have affirmed that the DOE's 2014 estimates were too low, and has generally supported the estimates provided by earlier top-down analyses, estimating that roughly 2.3% of extracted natural gas leaks to the atmosphere.[318] CO10-89 Cont'd

X. The DEIS Fails to Adequately Address Climate Change CO10-90

The DEIS fails to take the required hard look at greenhouse gas emissions and climate change for multiple reasons.

First, the DEIS fails to even acknowledge the Project's net operational greenhouse gas emissions. Because the impacts of greenhouse gas emissions occur only cumulatively, the only reasonable way to report these emissions is to report the total greenhouse gas emission increase that will result from the project. Here, however, the DEIS arbitrarily segments emissions from different sources: stationary sources, mobile sources, and, most significantly, generation of the

[316] Export LCA, 6-8.
[317] *See, e.g.* Brandt, A.R., *et al.*, *Methane Leaks from North American Natural Gas Systems*, Science, Vol. 343, no. 6172 at pp. 733-735 (Feb. 14, 2014), attached as Exhibit 90.
[318] Alvarez *et al.*, Assessment of methane emissions from the U.S. oil and gas supply chain, Science 361, 186–188 (Jul. 13, 2018), DOI: 10.1126/science.aar7204, attached as Exhibit 91 and available at http://science.sciencemag.org/content/early/2018/06/20/science.aar7204

CO10-90 We disagree. Section 4.13.3.9 includes a discussion of climate change and greenhouse gas emissions. Section 4.11.1 disclosed the Project direct emissions of GHGs.

electricity that will supply the facility. DEIS 4-174, 4-175, 3-19. Although the DEIS's section labeled "operating emissions and mitigation" discloses carbon dioxide equivalent emissions of 363,643 tons per year, adding in the indirect emissions caused by electricity consumption increases this total by 1,777,000, to more than two million.[319] CO10-90 cont'd

Second, the figures provided in the DEIS underestimate emissions by using outdated estimates of the potency of greenhouse gases (GHGs) other than carbon dioxide. The DEIS addresses these other GHGs by converting them to CO_2e. *E.g.*, DEIS 4-159. However, the conversion factor (global warming potential or GWP) used for methane, the predominant non-carbon-dioxide greenhouse gas at issue here, is sorely outdated, and fails to account for short- and medium-term impacts. The DEIS uses a GWP value of 25 for methane. *Id.* Although the DEIS provides no explanation for either the source of this number or FERC's reason for choosing it, the figure corresponds with the value presented by the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report in 2007 to reflect the impact of methane on a hundred-year timescale. In September 2013, five years *before* publication of the DEIS, IPCC released its Fifth Assessment Report, which includes superseding and significantly higher estimates for the GWP of methane. IPCC, Climate Change 2013, The Physical Science Basis, Chapter 8, 713-14 (Sept. 2013).[320] This report increased the 100-year-timeframe estimates methane from fossil fuels to 36 when the effects of oxidation are taken into account.[321] *Id.* This report also explained that on a 20- CO10-91

[319] We also reiterate that the EIS must also broaden its analysis to include emissions from the entire natural gas lifecycle.
[320] Attached as Exhibit 92, available at http://ipcc.ch/pdf/assessment-report/ar5/wg1/WG1AR5_Chapter08_FINAL.pdf.
[321] For a discussion of the effects of oxidation on methane's GWP, see Bradbury, et al., Dep't of Energy, Office of Energy Policy and Systems Analysis, *Greenhouse Gas Emissions and Fuel Use within the Natural Gas Supply Chain – Sankey Diagram Methodology* (July 2015), at 10, attached as Exhibit 93 available at https://www.energy.gov/sites/prod/files/2015/07/f24/QER%20Analysis%20-%20Fuel%20Use%20and%20GHG%20Emissions%20from%20the%20Natural%20Gas%20System%2C%20Sankey%20Diagram%20Methodology_0.pdf.

CO10-91 The EPA has accepted the GWP value of 25 for methane over a 100-year period. FERC appropriately selected this value because this is the value EPA established on November 29, 2013 for reporting of GHG emissions. EPA supported the 100-year time period over the 20-year period in its summary of comments and responses in the final rulemaking, 2013 Revisions to the Greenhouse Gas Reporting Rule and Final Confidentiality Determinations for New or Substantially Revised Data Elements, establishing the methane GWP at 25 (78 FR 71904, November 29, 2013). Similarly, in this final rulemaking, EPA supported the adoption of the published IPCC's Fourth Assessment Report GWP values over the Fifth Assessment Report values. EPA acknowledged the Fifth Assessment Report could lead to more accurate assessments of climate impacts in the future; however, when balanced with the benefit of retaining consistency with other U.S. climate programs, including EPA's Greenhouse Gas Reporting Program and Inventory of U.S. Greenhouse Gas Emissions and Sinks, the potential gain in accuracy does not justify the loss of consistency in reporting and likely would cause stakeholder confusion among the various GWPs used in different programs. EPA identified that it may consider adoption of the Fifth Assessment Report GWPs in the future, at which time we will ensure that FERC staff request the use of any revised EPA GWP values in future NEPA evaluations.

year timeframe, methane's impact is even more severe, causing 87 times the warming of an equivalent mass of carbon dioxide (also accounting for the effects of oxidation). *Id.* The 20-year GWP for methane is particularly relevant because it corresponds much more closely to the average time that methane actually remains in the atmosphere before decaying into CO2, which is 12.4 years.[322] There is no dispute that the Fifth Assessment Report values represent a more accurate estimate of the impact of each ton of methane emissions.[323] CO10-91 Cont'd

More broadly, courts have consistently recognized that the IPCC summaries represent the scientific consensus.[324] Here, the DEIS violates NEPA's obligation to use "high quality information," 40 C.F.R. § 1500.1(b) and provide "full and fair discussion of significant environmental impacts," 40 C.F.R. § 1502.1, by relying on an estimate of methane's impacts that was known to be outdated and an understatement of the true potency of this pollutant, by failing to disclose that the analysis it provided only considered long term (100-year) impacts, and by failing to use available tools, such as the estimate of methane's 20-year GWP, to address more near-term impacts. Each of these failures violates NEPA. *See W. Org. of Res. Councils v. U.S. Bureau of Land Mgmt.*, No. CV 16-21-GF-BMM, 2018 WL 1475470, at *16 (D. Mont. Mar. 26, 2018) (holding that agency violated NEPA by estimating emissions solely on the basis of methane

[322] *See* Exhibit 92, at 731, Appendix 8.A.
[323] *See* Department of Energy, Order 3357-C, FE Docket 11-161-LNG, at 30 (Dec. 4, 2015), Exhibit 94 and available at https://fossil.energy.gov/ng_regulation/sites/default/files/programs/gasregulation/authorizations/2011/applications/ord3357c.pdf; Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1-9 to 1-10 (Apr. 12, 2018), Exhibit 95 and available at https://www.epa.gov/sites/production/files/2018-01/documents/2018_complete_report.pdf; *id.* Annex 6, A-437, Exhibit 96 and available at https://www.epa.gov/sites/production/files/2018-01/documents/2018_annex_6.pdf
[324] *Massachusetts v. E.P.A.*, 549 U.S. 497, 508-512 (2007) (The IPCC is recognized as "a multinational scientific body … [d]rawing on expert opinions from across the globe); *Coal. for Responsible Regulation, Inc. v. E.P.A.*, 684 F.3d 102, 119 (D.C. Cir. 2012), *aff'd in part, rev'd on other grounds in part sub nom. Util. Air Regulatory Grp. v. E.P.A.*, 134 S. Ct. 2427 (2014), *and amended sub nom. Coal. for Responsible Regulation, Inc. v. Envtl. Prot. Agency*, 606 F. App'x 6 (D.C. Cir. 2015) (IPCC's "peer-reviewed assessments synthesized thousands of individual studies on various aspects of greenhouse gases and climate change and drew 'overarching conclusions' about the state of the science in this field.").

GWP of 25).

CO10-91 Cont'd

Third, the estimates provided in the DEIS do not include foreseeable indirect effects relating to gas production and use, or production of the electricity that will be consumed by the project, as we discuss *supra*.

CO10-92

Fourth, the DEIS Provides no meaningful discussion of the significance or impacts, as well as the amount, of the greenhouse gas emissions associated with the project. *Sierra Club v. FERC*, 867 F.3d 1357, 1374 (D.C. Cir. 2017) ("*Sabal Trail*"). The DEIS's assertion that FERC "cannot determine whether or not the Project's contribution to cumulative impacts on climate change would be significant" because "cannot determine the Project's incremental physical impacts due to climate change on the environment" is arbitrary. DEIS 4-306.

CO10-93

Contrary to the DEIS's assertions, FERC *can* meaningfully discuss incremental physical impacts. In 2017, the U.S. Global Change Research Project again confirmed and quantified a broad range of environmental impacts resulting from greenhouse gas emissions,[325] including discussing how changes in temperature, rainfall, and flood risk from sea level rise will vary for individual regions in the United States.[326] In late 2018, this same federal project discussed impacts that are *already occurring* in communities around the country.[327] Because the tools used to assess current and future impacts of climate change respond to different emission scenarios, it is possible to meaningfully discuss the *incremental* impact of the emissions at issue here. Greenhouse gas emissions are largely interchangeable—an additional million tons of carbon dioxide emitted in 2030, for example, will have the same impact regardless of whether it is

[325] U.S. Global Change Research Program, 2017: Climate Science Special Report: Fourth National Climate Assessment, Volume I, doi: 10.7930/J0J964J6 (Nov. 3, 2017), available at https://science2017.globalchange.gov/downloads/CSSR2017_FullReport.pdf and attached as Exhibit 97.
[326] *See, e.g.*, *id.* at 334.
[327] U.S. Global Change Research Program, 2018: Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II, doi: 10.7930/NCA4.2018 (Nov. 2018), Exhibit 98 and available at https://nca2018.globalchange.gov/downloads/NCA4_Report-in-Brief.pdf.

DEIS Comments of Defenders of Wildlife, Save RGV from LNG, Shrimpers and Fisherman of the RGV, Sierra Club, and Vecinos para el Bienestar de la Comunidad Costera in CP16-480 *Page 101*

CO10-92 Gas production and gathering activities, and the pipelines and facilities used for these activities, are not regulated by FERC and are outside the scope of the NEPA analysis. While past, present, and reasonably foreseeable future oil and gas infrastructure within the geographic scope of the cumulative impacts assessment are addressed in section 4.13. Regarding end-use of gas, see response to comment CO10-84.

CO10-93 We disagree. Section 4.13.3.9, Climate Change, of the EIS includes a discussion of the effects of the increase in global GHG emissions. With respect to evaluating the social cost of carbon, see response to comment CO7-3.

emitted as a result of the Annova Project or as a result of some other activity elsewhere in the world. CO10-93 Cont'd

We encourage FERC to provide further context regarding the significance and impact of these emissions by using the Interagency Working Group's social cost of carbon protocol.[328] Climate change is the quintessential cumulative impact problem, and the individual physical changes that will result from any particular action will inevitably appear insignificant to the public. Just as the public and decisionmakers "cannot be expected to convert curies or mrems into such costs as cancer deaths," the EIS's readership cannot be expected to understand whether an individual project's miniscule marginal increase contribution to increased temperature, sea levels, *etc.* is cause for concern. *Natural Res. Def. Council, Inc. v. U. S. Nuclear Regulatory Comm'n*, 685 F.2d 459, 487 n.149 (D.C. Cir. 1982) *rev'd on other grounds sub nom. Baltimore Gas & Elec. Co. v. Natural Res. Def. Council, Inc.*, 462 U.S. 87, 106-107 (1983). Because individual contributions to climate change are so small, but the cumulative problem is so large, meaningfully disclosing the impact of greenhouse gas emissions requires some tool beyond merely identifying physical changes in the environment attributable to an individual project's emissions.

NEPA does not, of course, require agencies to monetize adverse impacts in all cases. *See* 40 C.F.R. § 1502.23. The statute does, however, require FERC to take a hard look at the "ecological …, aesthetic, historic, cultural, economic, social, [and] health," effects of its actions, "whether direct, indirect, or cumulative." 40 C.F.R. § 1508.8. Monetization of costs may be required where available "alternative mode[s] of [NEPA] evaluation [are] insufficiently detailed to aid the decision-makers in deciding whether to proceed, or to provide the information the public needs to evaluate the project effectively." *Columbia Basin Land Prot. Ass'n v. Schlesinger*,

[328] Social Cost of Carbon 2010, https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf, attached as Exhibit 99, at 24-25.

643 F.2d 585, 594 (9th Cir. 1981); *see also Ctr. for Biological Diversity v. Nat'l Highway Traffic Safety Admin.*, 538 F.3d 1172, 1201 (9th Cir. 2008) (NHTSA violated NEPA where it failed to monetize the benefits of GHG emission reductions from more stringent fuel economy standards even while it monetized the adverse costs of such standards due to depressed automobile sales and employment).

CO10-93 Cont'd

In another recent case concerning an energy infrastructure project, where the agency's NEPA analysis quantified greenhouse gas emissions but claimed that it was impossible to discuss the effects thereof, the court ruled that the agency's refusal to use the social cost of carbon to illustrate the impact of these emissions was arbitrary and capricious. *High Country Conservation Advocates v. United States Forest Serv.*, 52 F. Supp. 3d 1174, 1190-91 (D. Colo. 2014); *see also Montana Envt'l Info. Ctr. v. U.S. Office of Surface Mining*, 274 F. Supp. 3d 1074, 1097 (D. Mont. 2017), *amended in part, adhered to in part sub nom. Montana Envtl. Info. Ctr. v. United States Office of Surface Mining*, No. CV 15-106-MDWM, 2017 WL 5047901 (D. Mont. Nov. 3, 2017).

Although they likely underestimate the true costs of GHG emissions, the IWG's social cost metrics remain the best estimates yet produced by the federal government for monetizing the impacts of GHG emissions and are "generally accepted in the scientific community," 40 C.F.R. § 1502.22(b)(4). This is true notwithstanding Executive Order 13,783, which disbanded the Interagency Working Group and formally withdrew its technical support documents.[329] Indeed, that Executive Order did not find fault with any component of the IWG's analysis. To the contrary, it encourages agencies to "monetiz[e] the value of changes in greenhouse gas emissions" and instructs agencies to ensure such estimates are "consistent with the guidance contained in

[329] Exec. Order. No. 13,783 § 5(b), 82 Fed. Reg. 16,093 (Mar. 28, 2017).

OMB Circular A-4."[330] The IWG tool, however, illustrates how agencies can appropriately comply with the guidance provided in Circular A-4: OMB participated in the IWG and did not object to the group's conclusions. As agencies follow the Circular's standards for using the best available data and methodologies, they will necessarily choose similar data, methodologies, and estimates as the IWG, since the IWG's work continues to represent the best estimates presently available.[331] Thus, the IWG's 2016 update to the estimates of the social costs of greenhouse gases remains the best available and generally accepted tool for assessing the impact of greenhouse gas emissions, notwithstanding the fact that this document has formally been withdrawn.[332]

CO10-93 Cont'd

In other proceedings, FERC has offered various arguments against using the social cost of carbon protocol that all seriously misunderstand the tool. The estimates of social cost are based on reasonable forecasts of the actual physical effects greenhouse gas emissions will have on the environment, including temperature, sea level rise, ecosystem services, and other physical impacts, together with assessments of how these physical changes will impact agriculture, human health, *etc*. The social cost protocol identifies the social cost imposed by a ton of emissions' pro rata contribution to these environmental problems. As explained above, this either amounts to an assessment of physical impacts or the best available generally accepted alternative to such an assessment; either way, the tool is appropriate for use under NEPA. 40 C.F.R. § 1502.22(b)(4).

Nor is lack of consensus as to a single most appropriate intergenerational discount rate a

[330] *Id.* § 5(c).

[331] Richard L. Revesz et al., *Best Cost Estimate of Greenhouse Gases*, 357 SCIENCE 6352 (2017) (explaining that, even after Trump's Executive Order, the social cost of greenhouse gas estimate of around $50 per ton of carbon dioxide is still the best estimate), available at http://policyintegrity.org/files/publications/Science_SCC_Letter.pdf and attached as Exhibit 100.

[332] U.S. Interagency Working Group on the Social Cost of Greenhouse Gases (IWG), "Technical support document: Technical update of the social cost of carbon for regulatory impact analysis under executive order 12866 & Addendum: Application of the methodology to estimate the social cost of methane and the social cost of nitrous oxide" (August 26, 2016), available at https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/scc_tsd_final_clean_8_26_16.pdf and attached as Exhibit 101.

CO10-93 Cont'd

reason for refusing to use the social cost protocols. As the 2010 Technical Support Document explained, a range of three discount rates—2.5, 3, and 5 percent—"reflect reasonable judgments" and "span a plausible range" of appropriate discount rates, and are consistent with OMB Circular A-4.[333] (The IWG also recommended use of a 3 recent rate at the 9th percentile to model climate "tipping points").

Although some analysts assert that any analysis of multi-generational, potentially catastrophic problem such as climate change merits a lower discount rate than this range would reflect, the IWG's "central" value of 3 percent falls within the range supported by a majority of economists.[334] Indeed, the Circular itself provides a general recommendation for a 3 percent rate; and while it also identifies 7 percent rate as appropriate for use in other circumstances, the Circular itself states that the 7 percent figure should not be used when assessing impacts that, like climate change, will affect the public as a whole. Furthermore, OMB, together with the rest of the Interagency Working Group, has explicitly affirmed that the 7 percent rate is inappropriate when addressing climate change.[335] Thus, as explained by the IWG, uncertainty as to the most appropriate discount rate is a reason to provide social cost estimates using the range of plausible rates—which FERC and other agencies have done in other proceedings[336]—but it is not a reason for ignoring the social cost of greenhouse gas emissions entirely. *Center for Biological Diversity,*

[333] IWG 2010 Social Cost of Carbon TSD at 17-18, 23.

[334] *See* Peter Howard & Derek Sylvan, *The Economic Climate: Establishing Expert Consensus on the Economics of Climate Change* (Inst. Policy Integrity Working Paper 2015/1), attached as Exhibit 102; M.A. Drupp, et al., *Discounting Disentangled: An Expert Survey on the Determinants of the Long-Term Social Discount Rate* (London School of Economics and Political Science Working Paper, May 2015) (finding consensus on social discount rates between 1-3%), attached as Exhibit 103.

[335] Interagency Working Group on the Social Cost of Carbon, *Response to Comments: Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12,866* at 36 (July 2015), available at https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/scc-response-to-comments-final-july-2015.pdf and attached as Exhibit 104.

[336] *See, e.g.*, FERC, Final EIS, Constitution Pipeline and Wright Interconnect Projects, CP13-499 (Oct. 2014), Accession No. 20141024-4001, at 4-256 to 4-257 ("For 2015, the first year of project operation, … the project's social cost of carbon for 2015 would be $1,638,708 at a discount rate of 5 percent, $5,325,802 at 3 percent, and $8,330,100 at 2.5 percent.").

538 F.3d at 1200 (disagreement over cost of carbon emissions does not allow agency to forgo estimating cost where, "while the record shows … a range of values, the value of carbon emissions reduction is certainly not zero.").

CO10-93 Cont'd

Failure to grapple with the importance and consequences of greenhouse gas emissions undermines other aspects of the Project analysis. For example, had FERC concluded that the climate impacts were significant, this would have supported more meaningful evaluation of alternatives that could potentially reduce these impacts. More broadly, estimating social cost of greenhouse gas emissions will help the public and FERC understand whether the adverse consequences of the Project's emissions are severe enough to warrant consideration in the public interest/public convenience and necessity analyses, and, indeed, whether these emissions tip the balance toward the conclusion that the project is contrary to, and not required by, the public convenience and necessity. The current DEIS provides no information to use in answering these questions; it is indisputable that estimating the impacts of emissions using the social cost protocols would speak to these issues, regardless of whether FERC concludes that the monetized impact is or is not significant. Although FERC has discretion to choose among reliable methodologies for evaluating impacts, that discretion does not allow FERC to provide *no* evaluation whatsoever when a generally accepted methodology is available. 40 C.F.R. § 1502.22(b)(4), *see also N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1085 (9th Cir. 2011) (holding that agency decision not to survey for wildlife prior to approving project was not a valid exercise of discretion as to assessment methodology).

Thus, the DEIS's assertion that it is impossible to discuss the impact or significance of the Project's greenhouse gas emissions is arbitrary. DEIS 4-306. FERC must use available generally accepted tools to address the impact of these emissions, 40 C.F.R. 1502.22, and employ

reasonable forecasting in its analysis. FERC's refusal to use available modeling tools, such as the estimates of the social cost of carbon and other greenhouse gases, violates NEPA. CO10-93 Cont'd

XI. The DEIS Fails to Adequately Address Cumulative Impacts CO10-94

An EIS must consider not only the direct adverse impacts of a project, but also its probable secondary, indirect, and cumulative impacts. A project's "cumulative impact" is defined in the federal regulations as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." 40 C.F.R. § 1508.7.

The Fifth Circuit has held that a "meaningful cumulative-effects study must identify: (1) the area in which effects of the proposed project will be felt; (2) the impacts that are expected in that area from the proposed project; (3) other actions—past, proposed, and reasonably foreseeable—that have had or are expected to have impacts in the same area; (4) the impacts or expected impacts from these other actions; and (5) the overall impact that can be expected if the individual impacts are allowed to accumulate." *Fritiofson v. Alexander*, 772 F.2d 1225, 1245 (5th Cir. 1985) (citing *Cabinet Mountains Wilderness/Scotchman's Peak Grizzly Bears v. Peterson*, 685 F.2d 678, 683-84 (D.C. Cir. 1982)).

The DEIS undertakes a cumulative impacts analysis.[337] Significant impacts to some resources, including impacts to ocelots and jaguarundis, of these resources are expected. The comments above identify flaws in the cumulative impacts analysis for some specific resources

[337] DEIS Part 4.13.

CO10-94 We disagree that the EIS fails to adequately address cumulative impacts. Section 4.13 addresses the five items listed in this comment that are needed for a meaningful cumulative effects analysis.

(*e.g.*, habitat for endangered species). But the analysis fails to satisfy the "hard look" NEPA standard for additional reasons. CO10-94 Cont'd

First, FERC's analysis of past actions and its approach to the incremental analysis from proposed and reasonably foreseeable actions is insufficient. In the Rio Grande LNG DEIS and the Texas LNG DEIS, FERC undertook a "broad, aggregated approach" to past actions.[338] In the Annova LNG DEIS, FERC states that it will focus on the current aggregate effects of past actions by considering these past impacts as part of the environmental baseline which is described and evaluated in the document. DEIS at 4-259. But in practice, this means the same thing: simply describing the current regional landscape on a high level without actually analyzing past actions' impact on resources that will be affected by the Annova LNG Project. No real analysis of these past actions, or their cumulative impacts, is disclosed. For example, in its wetlands analysis, FERC aggregates the total known wetland impacts associated with the Annova LNG Project and other known projects to arrive at 812 acres of impact. DEIS 4-276.[339] (Commenters note that the cumulative impacts to wetlands was described as 546.9 acres of impact in the Rio Grande LNG DEIS and 676.3 acres of impact in the Texas LNG DEIS.) The agency then derives an estimated total acreage of wetlands present in the Bahia Grande-BSC HUC-12 subwatershed, and performs an incremental analysis of the impacts relative to this total acreage. *See* DEIS 4-276 – 277. No further description or analysis of past wetland impacts, whether qualitative or quantitative, is included in the DEIS. CO10-95

The CEQ regulations on cumulative impacts first require the regulatory agency to look at the "incremental impact" of a project; the incremental impact must then be added to the

[338] *See, e.g.*, DEIS for Texas LNG at 4-263.

CO10-95 Section 4.13.1 of the EIS provides a discussion of past actions that have affected resources in the Project area. In addition, the remainder of section 4 outlines the baseline conditions in the Project area. CEQ guidance states that an adequate cumulative effects analysis may be conducted by focusing on the current aggregate effects of past actions without delving into the historical details of individual past actions. In the EIS, we consider the impacts of past projects within the resource geographic scopes as part of the affected environment (environmental baseline) which was described and evaluated in the preceding environmental analysis. However, present effects of past actions that are relevant and useful are also considered. The reason for the difference in reported cumulative impacts on wetlands between the three LNG project EISs is because each project has slightly different geographic scope used for the analysis, based on location and project-specific features such as the pipeline that is included with the Rio Grande LNG project.

environmental baseline, which includes all past and present actions that impact the affected area. 40 C.F.R. § 1508.7. By combining the incremental impact with the environmental baseline of impacts to the same affected resource, an agency can determine the total impacts to the area. In undertaking this analysis, it is imperative to understand the total cumulative impacts from existing, proposed, and reasonably foreseeable projects because the proposed action may be the "straw that breaks the back of the environmental camel," *Hanly v. Kleindienst*, 471 F.2d 823, 832 (2d Cir. 1972), resulting in overall significant impacts on the area. But the DEIS fails to quantify the past impacts (even in aggregate form) to many resources. CO10-95 Cont'd

By employing an erroneous form of 'incremental analysis,"[340] federal agencies will presumably be able to authorize, for example, the destruction of all remaining wetlands, as long as each increment is small relative to the body of wetlands that that remain in a watershed, without accounting for wetlands that have already been destroyed by past actions. The same is true for many affected resources. This is contrary to the Fifth Circuit's holding in *Fritiofsen*, which requires the agency to identify "the overall impact that can be expected if the individual impacts are allowed to accumulate."[341] FERC must include a detailed analysis of the impacts that already exist in this sub-region of Texas for each affected resource to serve as an environmental baseline to which the impacts from this project and other foreseeable projects is added. The analysis in the DEIS fails to meet this requirement.

Second, the 404(b)(1) Guidelines echo the importance of assessing cumulative impacts. The fundamental policy of the 404(b)(1) Guidelines is that "dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that such a discharge will not CO10-96

[340] The Court of Appeals for the D.C. Circuit has recognized that an "incremental analysis" approach fails to comply with statutory requirements. *Grand Canyon Trust v. FAA*, 290 F.3d 339, 341 (D.C. Cir. 2002).
[341] 772 F.2d at 1245.

CO10-96 Section 4.13.3.4 of the EIS discloses cumulative impacts on specific aquatic resources. With regard to mitigation plans, mitigation plans for the Annova Project as well as the other two proposed LNG projects would be finalized in coordination with the COE Section 404/Section 10 permit process, and none of the projects would be permitted to proceed with construction (if approved) until the mitigation plans have been finalized.

have an unacceptable adverse impact either individually *or in combination with known and/or probable impacts of other activities affecting the ecosystems of concern*,"[342] including specific wetland types (*e.g.*, mangrove habitat). The DEIS fails to adequately disclose cumulative impacts to specific aquatic resources and without a final mitigation plan being made available concurrent with the DEIS, it is not possible for the public to meaningfully comment on the cumulative impacts to these resources. CO10-96 Cont'd

Third, the DEIS does not include a separate cumulative impact analysis for air impacts as an appendix. This is surprising, since the Rio Grande LNG DEIS and Texas LNG DEIS both included a cumulative analysis of these air impacts.[343] Instead, a short description of these cumulative impacts was provided in the first volume of the DEIS. DEIS at 4-302ff. This analysis, like those provided for the other projects, is flawed. The analysis compiled the cumulative impacts for five criteria pollutants (NO_2, CO, $PM_{2.5}$, PM_{10}, and SO_2) at specified averaging periods for comparison to the primary NAAQS. *Id.* However, the Clean Air Act has set NAAQS for six common air pollutants; the cumulative impacts analysis fails to include ground-level ozone (O_3). *See* DEIS 4-159 (recognizing the EPA establishing NAAQS for these six criteria pollutants). A cumulative impacts analysis should be undertaken for ozone based on TCEQ modeling guidance. This analysis should be disclosed to the public. CO10-97

This is particularly important because there has been inconsistent information provided in the Rio Grande LNG DEIS, the Texas LNG DEIS, this DEIS, and in TCEQ's modeling analysis regarding projected maximum 8-hour ozone impacts. For example, the Texas LNG DEIS does not estimate maximum 8-hour ozone impacts of the Project. It includes estimated combined construction, commissioning, and operational emissions for NO_x (ranging from 63.4 tpy to 417.6

[342] 40 C.F.R. § 230.1(c) (emphasis added).
[343] *See* Rio Grande LNG DEIS at App. O; Texas LNG DEIS at App. F.

CO10-97 It is not necessary to include an appendix to support the cumulative impacts analysis for air impacts. Section 4.13.3.9 of the final EIS has been updated to include additional cumulative impacts air analysis.

tpy), but does not use AERMOD to calculate the five-year average of the maximum 8-hour NO_x predicted concentrations to estimate a maximum 8-hour ozone concentration.[344] The Rio Grande LNG DEIS stated that its modeling estimated the maximum 8-hour ozone impacts of the Rio Grande Project to be 2.3 parts per billion of ozone, which, when considered with the background concentration of 57 ppb, would not exceed the standard of 70 ppb.[345] However, the TCEQ Executive Director's Source Analysis and Technical Review for the Rio Grande LNG Project came to a significantly different conclusion.[346] The air quality analysis for ozone, based on EPA Region 6 guidance, found that the highest five year average for NO_x would be 3.87 ppb and the 8-year maximum predicted increase of ozone would be 11.6 ppb for the Rio Grande LNG Project, without considering either of the other two LNG facilities.[347] Adding 11.6 ppb to the 8-hour ozone background of 57 ppb will result in 68.6 ppb of ozone at a distance of 10km – without any other sources added.[348] It stands to reason that additional sources, including Texas LNG and Annova LNG, could result in a cumulative impact exceeding the ozone standard at a distance of 10km. This discrepancy must be reconciled by FERC during its review and a cumulative analysis, based on EPA guidance for PSD analysis for ozone, must be undertaken for all three LNG projects. Finally, FERC must take a hard look at the data, assumptions, and conclusions in this cumulative impacts analysis to satisfy its NEPA obligations and to ensure that the data presented in the Annova LNG DEIS, the Texas LNG DEIS, the Rio Grande LNG DEIS, and TCEQ documents is consistent and methodologically sound.[349]

CO10-97 Cont'd

[344] Texas LNG DEIS at 4-184.
[345] Rio Grande LNG DEIS at 4-258.
[346] *See* Exhibit 105, TCEQ Interoffice Memorandum for Rio Grande LNG, LLC's NSR Authorization No. 140792/PSDTX 1498 (Nov. 16, 2018).
[347] *Id.* at 12.
[348] *Id.* at 13.
[349] *See, e.g.*, Texas LNG DEIS, App. F at 2 (noting that the Texas LNG concentration ranks differ from TCEQ modeling guidance).

XII. Conclusion CO10-98

For the reasons state above, FERC's draft EIS for the Annova LNG export terminal fails to satisfy the requirements of the National Environmental Policy Act. Accordingly, FERC cannot move forward with approving this Project without addressing these deficiencies with either a revised draft EIS or, less preferably, a draft supplemental EIS, either of which must be circulated for further public review and comment.

Respectfully submitted February 4, 2019,

/s/ Nathan Matthews
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Attorney for VBCC

CO10-98 We disagree that a revised or supplemental draft EIS is required. However, we have considered all comments filed on the draft EIS and have updated or revised the final EIS where appropriate.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Oakland, CA this 4th Day of February, 2019.

Nathan Matthews
Senior Attorney
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ORIGINAL

south padre island CHAMBER of commerce

spichamber.com

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SECRETARY OF THE
COMMISSION

2019 JAN 22 P 12: 20

FEDERAL ENERGY
REGULATORY COMMISSION

January 11, 2019

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

Dear Secretary Bose:

I would like to express our Chamber's unwavering support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. CO11-1

Our South Padre Island Chamber of Commerce has supported development of LNG facilities at the nearby Port of Brownsville, Texas from the time when they first expressed interest in locating here. With the abundant supply of Texas natural gas, the development of LNG export facilities will allow for safe and efficient gas exports, and for us in deep South Texas, the Annova LNG project will offer important economic expansion and better paying jobs. The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs.

We are impressed with Annova LNG's proactive environmental mitigation efforts – including the use of electric driven motors to reduce air emissions. Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoids impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. CO11-2

We trust in the FERC permitting process and strongly support advancement of the Annova LNG application.

Sincere regards,

Roxanne M. Ray

Roxanne M. Ray. President/CEO
South Padre Island Chamber of Commerce
610 Padre Blvd.
South Padre Island, Texas 78597
Ph. 956-761-4412
roxanne@spichamber.com

CO12 South Padre Island Chamber of Commerce, page 1 of 1

CO11-1 Thank you for your comment.

CO11-2 Thank you for your comment.

Texas House of Representatives

EDDIE LUCIO III
DISTRICT 38
CAMERON COUNTY

February 1, 2019

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

Dear Secretary Bose:

I would like to express my unwavering support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000.

After a careful review of the matter, I have found that Texas has an abundant supply of natural gas, and Annova LNG can help this great state export it safely and efficiently. Annova LNG's proactive environmental mitigation efforts, including the use of electric driven motors to reduce air emissions, are commendable. EO01-1 EO01-2

Working collaboratively with various local and federal environmental stakeholders, Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. Further, the project proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. EO01-3

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. EO01-4

For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according its schedule.

Sincerely,

Eddie Lucio III

Eddie Lucio, III
State Representative
District 38

Capitol: P.O. Box 2910 • Austin, Texas 78768-2910 • (512) 463-0606 • Fax (512) 463-0660
District: 1324 E. Madison Street • Brownsville, Texas 78520 • (956) 542-2800 • Fax (956) 542-2889
Committees: Rules & Resolutions, Chair • Government Transparency & Operation • Natural Resources

ELECTED OFFICIALS

EO01 Eddie Lucio III, Texas House of Representatives, page 1 of 1

EO01-1 Thank you for your comment.

EO01-2 Thank you for your comment.

EO01-3 Thank you for your comment.

EO01-4 Thank you for your comment.

ALEX DOMINGUEZ

TEXAS HOUSE OF REPRESENTATIVES
DISTRICT 37

February 4, 2019

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

Dear Secretary Bose:

I respectfully write to express my support for support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. EO02-1

The Annova LNG project will provide jobs and job training to the underemployed area of South Texas. The project is expected to create 700 construction jobs and 165 high-paying permanent jobs. EO02-2

In addition, Annova LNG has demonstrated its dedication to protecting our beautiful region by assuring the use of environmentally conscious practices. The plans for the project include the construction of a 185-acre environmental conservation corridor to protect against disruption to over 100 acres of wetlands. The project also intends to restore and enhance over 250 acres of wetlands and shallow water habitat. EO02-3

After careful consideration of the matter, I support the development of the Annova LNG project. I am confident that Brownsville and the great state of Texas will benefit significantly from the development. EO02-4

Sincerely,

Alex Dominguez
State Representative, District 37

CAPITOL OFFICE: P.O. BOX 2910 · AUSTIN, TEXAS 78768-2910 · PHONE (512) 463-0640
ALEX.DOMINGUEZ@HOUSE.TEXAS.GOV

EO02 Alex Dominguez, Texas House of Representatives, page 1 of 1

EO01-1 Thank you for your comment.

EO01-2 Thank you for your comment.

EO01-3 Thank you for your comment.

EO01-4 Thank you for your comment.

The Senate of
The State of Texas

DAN PATRICK
LIEUTENANT GOVERNOR

CAPITOL OFFICE
State Capitol, Room 2E.13
Post Office Box 12068
Austin, Texas 78711
(512) 463-0001
Fax: (512) 463-4668

February 4, 2019

Secretary Kimberley D. Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington, Washington DC 20426

Dear Secretary Bose:

This letter affirms my continued support for the Annova LNG project in Brownsville, Texas. On December 14, 2018, FERC issued its Draft Environmental Impact Statement for Docket No. CP16-480-000. The Annova LNG project has committed to provide a safe and efficient export terminal for the abundant supply of natural gas produced in Texas. EO03-1

This project is not only expected to create 700 construction jobs, equivalent to almost $325 million in direct labor income, but also expected to create 165 high-paying permanent jobs for the people of our state. EO03-2

After collaborating and working closely with various local and federal environmental stakeholders, Annova LNG has modified its layout to create an 185-acre environmental conservation corridor to avoid impacting over 100 acres of wetlands. Additionally, by proposing to restore and enhance over 250 acres of wetlands and shallow water habitats, the efforts would rebuild tidal exchange and estuarine habitats, lost when the Brownsville Ship Channel and State Highway 48 were constructed. EO03-3

I once again urge FERC to issue its Final Environmental Impact Statement on schedule. Please do not hesitate to contact me with any questions during the review process.

Sincerely,

Dan Patrick
Lieutenant Governor

EO03 Lieutenant Governor Dan Patrick, page 1 of 1

EO03-1 Thank you for your comment.

EO03-2 Thank you for your comment.

EO03-3 Thank you for your comment.

PUBLIC COMMENT SESSION

PM01 Scoping Meeting, Port Isabel, TX, January 10, 2019, page 1 of 110

1 FEDERAL ENERGY REGULATORY COMMISSION
2 ANNOVA LNG COMMENT PROJECT
3 Docket Number: CP16-480-000
4
5 SCOPING MEETING
6
7 Port Isabel Convention Center
8 309 E. Railroad Avenue
9 Port Isabel, TX 78578
10
11 Thursday, January 10, 2019
12 5:00 p.m.
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1 SPEAKER LIST
2 William B. Beaty
3 Chirag Bhagat
4 Saarang Rama
5 Joseph Linck
6 Patricia Rubio
7 Joanna Ward
8 Bob Radnik
9 Patrick Anderson
10 Alicja Shipley
11 Glenn Boward
12 Paul Sanchez-Navarro
13 Maria Galasso
14 William Berg
15 Madeleine Sandefur
16 Marta Elena Pena
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P R O C E E D I N G S

MR. BEATY: Okay, my name is William Beaty, W-i-l-l-i-a-m, middle initial B, last name B-e-a-t, as in Tom, y. And my comments are as follows. My concern with these projects -- this one included, is that this is the -- I believe this is the wrong place to do it. This is the vacation destination, sport fishing, birding, kind of eco-tourism center of Texas and this type of project is, I believe, really out of place in a community that's looking to conserve and not put another footprint down. PM01-1

We're also concerned about the environmental concerns. We're very close to a high school. We've had pediatricians come in and tell us how the emissions from this project may very well influence our -- the health of our children, sorry about that (phone ringing), as well as the fact that these projects will become the largest single emitter of contaminants in the county, overshadowing the vehicular traffic that we have at present. PM-02

So those are my main concerns and those are the only ones I'd like to dwell on because the others are of less consequence. I just think that these are the most important and most of concern to the local economy. I think they will affect the local economy and I think they will hurt the jobs that exist now in vacationing, fishing and the others that eco-tourism which brings in about a half a PM01-3

PM01 continued, page 3 of 110

PM01-1 Thank you for your comment.

PM01-2 Air emissions are evaluated in section 4.11.1.2 of the EIS. As described in that section of the EIS, primary standards for NAAQS emissions set limits the EPA determined are necessary to protect human health including sensitive populations such as children, the elderly, and asthmatics. Review of the Project's emissions against the NAAQS primary standards takes into account human health.

PM01-3 Thank you for your comment. Potential impact of the Annova LNG Project on the local economy, including industries that support vacationing, fishing, and ecotourism, are evaluated in section 4.9 of the EIS.

1 billion dollars in the Rio Grande Valley, is my PM01-3 Cont'd
2 understanding at this point.
3 And I'm a home owner here. I've lived here for
4 ten years and those are my comments. I hope they are
5 understandable, meaningful and they will be addressed.
6 Thank you.
7 MR. BHAGAT: My name is Chirag Bhagat, spelled
8 C-h-i-r-a-g, last name is B, as in boy, h-a-g-a-t. So, I PM01-4
9 represent the hospitality industry here in the Rio Grande
10 Valley. My family combined has been running hotels in the
11 Rio Grande Valley for over 30 years.
12 We are looking forward to LNG opening up a plant
13 here, hopefully to help boost, not only the hospitality
14 industry, but also our local economy here in the Rio Grande
15 Valley. We are -- we've seen the Valley go from a very
16 small place to now being a booming economy. We would like
17 to see that infrastructure continue to grow so we look
18 forward to LNG putting in a plant here in South Texas and
19 hopefully for not only the hospitality industry, but all
20 industries in general see a boom to our bottom line in our
21 revenue because of them being here. I think that's it.
22 MR. RAMA: All right. So my name is Saarang
23 Rama. It's spelled S-a-a-r-a-n-g, last name Rama, R-a-m-a. PM01-5
24 And I'm pro-LNG. We'd like to see this industry grow in
25 Cameron County in general. We own several properties in

PM01 continued, page 4 of 110

PM01-4 Thank you for your comment.

PM01-5 Thank you for your comment.

1 Cameron County, in the hospitality industry so we've got PM01-5
2 several hotels.
3 We've seen, you know, construction crews and we'd
4 like to see more. We think that it will create more jobs
5 for locals, as well as bring in people from out of town --
6 maybe people moving permanently or maybe people just coming
7 for a couple of months to work down here which will bring,
8 you know, more commerce for our area, as well as for all
9 industry, not just hotel industry because these folks will
10 stay here, eat here and play here, so that that's good for
11 our economy, in general, for our area.
12 Past couple, I guess the past two years or so
13 we've seen activity with the construction crews. I'm not
14 sure exactly what they're doing but it's in regards to the
15 pipeline being installed as well as maybe some of the LNG
16 work that's being done at the moment at the port.
17 So, we've seen several companies down in our area
18 that we've never seen before and I'm pretty sure it's direct
19 correlation to LNG making its way down and we would like to
20 see that grow. We understand that it's going to create a
21 lot more jobs, and in general, create more economy or a
22 better economy for us down here.
23 MR. LINCK: Joseph Linck, J-o-s-e-p-h Linck,
24 L-i-n-c-k. I came here today, and my first question was why PM01-6
25 is this always out here on South Padre Island which is a

PM01-6 Thank you for your comment.

lovely little island, but filled with retirees that have no kids graduating from local schools and we -- I'm from Brownsville. PM01-6 Cont'd

Brownsville is 100 times bigger than South Padre Island and got a population of 2,000 with thousands of kids graduating every year from high school and they all have to leave because there's no jobs here.

And that's not particularly why I'm here today though. I'm here to speak about U.S. energy independence and natural gas is the future fuel on the horizon. It's coming. Natural gas is the key to so many problems and LNG is just natural gas in another form. PM01-7

All the environmental objections you hear locally is based on anti-frackers and basically people that are against any kind of hydrocarbon expansion. And until we find an alternative for natural gas, that's the best we can get and there's no viable alternative yet.

I've been in the energy business for many years or used to be a lot longer, but that's my basic concern. I don't think the local interests here are jeopardized in any way, shape or form by what is not even a big manufacturing plant. PM01-8

I mean I used to work for a refinery about 40 years ago and I'm familiar with all the environmental stuff and I see this is the most benign project environmentally I

PM01 continued, page 6 of 110

PM01-7 Thank you for your comment.

PM01-8 Thank you for your comment.

1 think that Brownsville has ever had. We've had far worse PM01-8 Cont'd
2 environmental industries here in the Port of Brownsville.
3 And the other thing is you know, we are 17 miles PM01-9
4 from the Port of Brownsville. This is a very long ship
5 channel and this island out here does not represent most of
6 the people in Brownsville. So, I would suggest for your
7 next meeting you have one in Brownsville or McAllen or
8 Harlingen, any of those cities will probably give you a
9 whole different slant on the politics of this thing down
10 here.
11 These plants are backed 100 percent by the PM01-10
12 community. I mean the negative comments you'll get out of
13 here in this tourist spot do not in any way, shape or form
14 reflect the feelings of the people of Brownsville. I've
15 lived here for 40 years, so I've seen the local politics and
16 what goes on. They make a lot of noise, but they have no
17 backing, other than from outside.
18 So, and we have no idea where they're getting all
19 their money. It's not coming from this area. It's coming
20 from somewhere else and going back to my original thought --
21 America being independent energy-wise, who does that
22 threaten?
23 It's costing Saudi Arabia, Iran, Iraq, Libya, all
24 the existing OPEC countries are scared to death of U.S.
25 energy independence. We've recently become the largest

PM01-9 Thank you for your comment. We do not plan to hold other comment sessions on the Annova LNG Project.

PM01-10 Thank you for your comment.

PM01-10 Cont'd

exporters or largest users and exporters of hydrocarbons in the world -- more production now than Saudi Arabia or Russia, and I don't see that -- I see the geopolitics in the situation and I wish everybody would consider that because you know, every dollar that the United States gets off its fuel exports is $10 Russia doesn't get.

It has a gigantic multiplier effect geopolitically because they use that weapon as a weapon geopolitically. And the United States is owned by private sector, it's not owned by the government so, you know, private sector is totally different than dealing with Russia or someone like that who's entirely government-operated -- owned and operated.

They follow geopolitical goals first then worry about and the energy exports gives a tremendous geopolitical clout around the world. Most countries go broke when the price of crude goes up. Most countries are total importers and dependent. I have no idea, but I'm sure 80 percent of the countries of the world do not have any of their own energy and 100 percent dependent on Russia, Saudi Arabia, OPEC and now the United States.

So, I'll end it with that, and I thank you for coming to Brownsville and remember you're in Brownsville not this little island resort out here. That's why I drove all the way out here.

MS. RUBIO: My name is Patricia Rubio, it's P-a-t-r-i-c-i-a, last name R-u-b-i-o. Good, okay, so I am opposed to Annova LNG. I have a great concern for our area. I'm born and raised here. And I have lived in various cities throughout the valley whether it be for school or for work. PM01-11

I am also an interpretative naturalist. I am a conservationist. I am an environmental educator. I work with K through 12, mostly elementary. I have worked at nature centers for the past five years and I am an active naturalist. I -- whether it be birds, snakes, butterflies, botany. I have actually assisted students that are working on their masters, and we've gone to these areas that want to be taken over and destroyed and scarred upon and have actually done measuring plant databases and it is just incredible pristine land. PM01-12

And it really needs to be left alone because so much has already been tampered with in this area that we have one of the most pristine Gulf Coast areas as compared to some of the other areas in Texas up north and to lose that would just be a travesty. Much of the area is -- we are in a major migratory pathway for birds, butterflies and also as someone who does bird tours and has friends that do bird tours, eco-tourism, that would just be devastating because then we lose money. PM01-13

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PM01-11 Thank you for your comment.

PM01-12 Thank you for your comment.

PM01-13 Thank you for your comment. Potential Project impacts on migratory birds, and butterflies and other pollinators is addressed in section 4.6.1.2 of the EIS. Potential Project impacts on tourism is addressed in section 4.9.2.2 of the EIS.

And, also, our friends who drive the boat who have the boats that take us so that we can take other people that come from all over the world and we also make friends and that's a really great sense of community that everyone, wherever you are should have.

It's very important. It's good for morale and for some of us this is a really important time, whether it be during migration or even on off-seasons to make money and it's very -- it's very easy to do so. It's possible, there are jobs for us to do where we take people and we just show them the land and all that's on it, so it would be taking jobs away from us. PM01-14

And if it's destroyed and we have no access, then how can we be able to educate people, show them places that they're flying from across the world to just to be able to say I saw this. I went to Padre, I went to Laguna Atascosa. I saw Lomitia and it's just such an honor to do so and I'm just opposed to Annova doing this because it's just a destruction of peoples' careers, families, health, wildlife and I just -- I'm opposed to this and I do not agree with this and I don't want it to happen.

And, also as an environmental educator who works with children, I want to be able to tell them the truth about the beauty of nature and I can't do that if it's destroyed. Thank you.

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PM01-14 Thank you for your comment.

MS. WARD: I'm Joanna Ward, J-o-a-n-n-a W-a-r-d. I bought my home in Laguna Vista in 2003 and chose to retire in this beautiful pristine community with fresh air, clean water, birds that migrate internationally from South America to North America and back again through spring and fall.

And we have international visitors here and our communities are built on ecotourism and the fossil fuel industry, the LNG exporters are highly polluting and the birds that migrate for thousands of years from one continent to another, this is their environment and we have endangered species here as well, the Aplomado falcon for one, pipers, all kinds of things in endangered species that we need to really take care of and we really need to take care of this. PM01-15

The Laguna Madre in our water here are only one of six hyper-sailing bodies of water on our planet Earth and we really need to show more respect for that. We have so many LNG export facilities already approved along the coast that haven't been built yet and other countries are -- Australia and other places are already fracking, including their countries to export.

We need to look here at what is going to happen to our land as a price that we have to pay. Many people are retired and a community I live in, Laguna Vista, tripled in size since 2003. A lot of people are coming from all over the country to retire and they're elderly and these effects PM01-16

PM01-15 Potential Project impacts on migratory birds is addressed in section 4.6.1.2 of the EIS, and impact on endangered species in section 4.7. In response to comments on the draft EIS we have added additional discussion of the Laguna Madre in the EIS.

PM01-16 With respect to human health impacts from the operating emissions from the Project, see response to comment PM1-2.

1 -- these toxins that these LNG facilities are going to be PM01-16 Cont'd
2 doing affects their cardiac condition, their respiratory
3 condition, as well as women that are pregnant in the
4 communities and the pollutants all come to the Port Isabel
5 High School in Laguna Vista.
6 I'm really concerned that this is being rushed PM01-17
7 through too quickly. We really need an extension with the
8 government shutdown and with the Environmental Impact
9 Statement that is totally incomplete. We really need to PM01-18
10 look at these Lomas and you can't mitigate and Annova has
11 made no real effort to give us a real mitigation plan for
12 our beautiful wetlands that birds come from another
13 continent and we have to respect all life, not only ours
14 but our wildlife because this is a rare area.
15 When I volunteered with Sea Turtle, Inc., people
16 from Corpus Christi, I tell them you know, there are three
17 companies that want to come here for LNG exports and they
18 were appalled, they couldn't believe it, they said this is
19 the only place left in Texas to come, you know.
20 Texas is going to be totally overrun by the PM01-19
21 fossil fuel industry who buys our governors, so we've got a
22 big problem with that and we need -- we need, besides the
23 extended deadline, we really need to have the Draft
24 Environmental Impact Statement completed.
25 I think it's criminal. I think it's a crime and

PM01-17 On February 7, 2019, FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

PM01-18 With respect to impacts on lomas and mitigation for that impact, see responses to comments IND9-14a, IND15-1, and CO10-57 and 58. With regard to mitigation for wetland impacts, see response to comment CO10-68.

PM01-19 Thank you for your comment. The draft EIS was completed in December 2018, and this final EIS includes comments made on the draft EIS.

1 we can't let them get away with that -- that needs to be PM01-19 Cont'd
2 totally completed and we'll fight it, even if we have to do
3 it legally. The Wetlands Mitigation Plan as proposed will PM01-20
4 violate a No Net Loss federal policy, so that's
5 unacceptable.
6 The operation -- the construction of the PM01-21
7 operation is going to be a problem and the building of the
8 operation they're saying it's not going to significantly
9 impact vegetation and that is not true, so we were getting
10 false statements already from the DEIS.
11 There are 53 acres after four years of PM01-22
12 construction is unrealistic. These Lomas are densely
13 vegetated, few in number and can't be rebuilt or recreated.
14 And the wildlife and the wildlife habitat -- that's not PM01-23
15 minor, I strongly disagree with that, that wildlife habitat
16 -- ocelots and the lighting that these things are going to
17 bring, the light, the pollutants and right -- Annova is
18 located right across the Bahia Grande, which is the largest PM01-24
19 restoration project in North America, you know, our
20 continent here in North America.
21 We need to protect that Bahia Grande and we can't
22 have sediment thrown into the Bahia Grande. That's going to
23 increase and these ships -- we haven't even looked at these PM01-25
24 ships and the waves and the changes they're going to make on
25 our fishing industry, shrimping industry which is --

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PM01-20 See response to comment CO10-68.

PM01-21 As stated in section 4.5.5 of the EIS, although approximately 409 acres of vegetation would be permanently lost because of the Project, the region contains large quantities of similar vegetation communities. Therefore, we have determined that construction and operation of the Project would not significantly impact vegetation.

PM01-22 See responses to comments IND9-14a, IND15-1, and CO10-57 and 58.

PM01-23 Potential impacts on the ocelot from Project construction and operation, including from facility lighting, is addressed in section 4.7.1.2.

PM01-24 Potential impacts on the Bahia Grande from Project construction and operation, including sedimentation, is addressed in section 4.3.2.2 of the EIS.

PM01-25 Potential impacts on the commercial fishing industry, including shrimping, is addressed in section 4.9.2.3 of the EIS.

1 everybody knows it's got fresh wild Gulf shrimp and the PM01-25 Cont'd
2 oysters that we have in the bay, all the stuff, we haven't
3 looked at the effects of that with what they're doing with
4 the land.
5 The Lighting Plan has significant wildlife PM01-26
6 implications and should be required by FERC as part of the
7 EIS, not just done before construction. You're just leaving
8 the public out of this whole process and that's illegal.
9 The U.S. Fish and Wildlife has agreed to PM01-27
10 surrender over 100 acres of the Loma Ecological Preserve
11 land and this formerly protected habitat needs to be
12 mitigated. That has not been mitigated yet, so you cannot
13 pre-approve this. There's a lot more work that needs to be
14 done. You can't rush this through because this is going to
15 affect these populations and a road that you can never
16 recover once you destroy this.
17 And this is a specific place on the planet for
18 people all over the world that come here. We have to think PM01-28
19 about the dredging impacts to the South Bay, that needs to
20 be examined, particularly since the DEIS says that
21 "cumulative impacts on surface water quality during
22 operation would be permanent and moderate to significant to
23 sea grasses and oyster beds, can be affected by even mild
24 dredged, spoiled deposition, weight and wake impacts from
25 increased tanker traffic should be examined as well."

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PM01-26 See response to comment IND14-6.

PM01-27 Impact on the Loma Ecological Preserve is included in section 4.6.1.2 of the EIS. This section has been updated with additional information since issuance of the draft EIS. With respect to potential mitigation for loss of loma habitat, see section 4.7.1.2.

PM01-28 Potential impacts on South Bay from the Project, including initial dredging as well as vessel traffic, are addressed in section 4.3.2.2 and 4.6.2.2 of the EIS.

We have -- I'm really concerned as a birder down here and that's one reason I chose to come down here and retire is a lot of us have, migratory as well as nesting bird impacts. Annova would -- the DEIS says that Annova would attempt to limit clearing on the project site between September 1st and February 28th to avoid impacts. Would attempt they say? That is very weak and unenforceable language and should be changed to "is required". PM01-29

I guess I'm going to have to make the rest of my statements online, there's so many things that are a problem with this going up that it's just unacceptable and before you approve any more, why don't you just build what you have already, destroy that area? PM01-30

The people that -- our ecotourism business is going to be destroyed. They promised jobs and they're no true facts about those jobs. I tried to get it from the man who presented this project when it started coming -- energy by national and he talked about all the jobs that were going to come. He was the banker from the Federal Reserve in Dallas, and I raised my hand and I asked, can I see some of the facts about that job? And he said, "oh, I don't have that with me, but I can send it to you." PM01-31

Well, he gave me his card afterwards and he told me to call him or email him. I did. I called him dozens of times, emailed him dozens of times, totally ignored, so we

PM01-29 As stated in section 4.6.1.2 of the EIS, in the event that clearing could not be accomplished during the stated time window, Annova proposes to implement additional measures, as recommended by the FWS, designed to avoid or minimize impacts on nesting birds, which would be acceptable.

PM01-30 Thank you for your comment.

PM01-31 Thank you for your comment. Potential impact of the Annova LNG Project on the local economy, including industries that support vacationing, fishing, and ecotourism, are evaluated in section 4.9 of the EIS.

1 really don't even know the facts about jobs for this PM01-31
2 community when all of the ecotourism jobs are going to be
3 taken and made half a million more -- so much money is going
4 to be lost from the ecotourism business and the people that
5 live here are going to suffer and the people that live up
6 north in The Woodlands are going to reap benefits while the
7 rest of us are collateral damaged and the wildlife and the
8 ecotourism and the people coming from all over the world for
9 migrations that appreciate birding and the beauty of what
10 really is important in life.
11 So, it's sad and it's unacceptable and I've --
12 FERC has to listen to the people. I don't know what else to
13 say right now because I'm so stressed out about this whole PM01-32
14 thing happening. The lights, the noise, who's going to want
15 to go and canoe and kayak across to Annova, you know, to see
16 that horrible thing?
17 And right now, you have the Bahia Grande, and
18 I'll tell you the difference since that's been built,
19 driving to the Brownsville airport, you just see along the
20 coast you see these beautiful elegant shore birds, the great
21 white egrets and the great blue herons, it's like heaven on
22 earth. I just want to stay there and not let them do this.
23 I want to stay with the birds before their
24 territory is destroyed.
25 MR. RADNIK: My name is Bob Radnik, B-o-b,

PM01-32 Thank you for your comment.

R-a-d-n-i-k, and I live in San Benito, Texas. I'm a retired research scientist. I moved down here in 2004 thinking that it would be getting away from a lot of the pollution that we were getting in San Antonio that was blowing up from Corpus Christi because of the prevailing southeasterly breezes, and all of a sudden San Antonio was having a lot of ozone days.

And so, well, we can go live closer to the coast and we won't be bothered with that. And I've been down here for a number of years and then in 2014 we heard about the LNG projects that wanted to come in here and settle in the Port of Brownsville.

And then after finding out where they were going to locate, realizing that the wildlife areas and the wetlands that would be destroyed by bringing in these LNG plants would be very detrimental to the quality of life here in the valley, so this led to my opposition to these plants coming in here.

And as far as looking particularly at the Annova location, it is right in the path of ocelot migration patterns and it also is going to destroy 25% of the Loma environmental systems that are present here in Cameron County. PM01-33

There are basically I believe 12 Lomas out there which are very unique ecological environments that have been there since the end of the last ice age. So this is

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PM01-33 See response to comments IND9-14a and IND15-1.

thousands and thousands of years of evolution and how things work together. And 25% of that will be eliminated by the Annova plant. And I don't think that there's any way you can mitigate that sort of destruction to very unique ecosystems. PM01-33

My other concern is the fact that climate change is something that's very real. I think that science has shown us what's going to be coming our way. The fact that we have the technology to move beyond fossil fuels, it would behoove us, if we truly are an intelligent species, to move in that direction and away from causing the next great extinction that will happen if we don't, because changing the earth's climate 2 degrees Celsius and possibly as much as 8 degrees Celsius will upset the balance so severely that many, many species that are in existence today will not be able to move, adapt or die, and then they will die.

So, this is my opposition to these plants coming here. I think that for the future of our planet, for the future of our species, we do not need to be encouraging the extraction industries to continue their rape of the only planet that we have. Thank you. PM01-34

MR. ANDERSON: Patrick Anderson, P-a-t-r-i-c-k, A-n-d-e-r-s-o-n. Regarding the Annova LNG Project, I am opposed to the project for the following reasons: Regarding socioeconomics, the need for the projects have not been PM01-35

PM01-34 Thank you for your comment.

PM01-35 See response to comment CO6-20.

demonstrated in the DEIS. For a project with so many negative impacts, a need for the project must be shown. PM01-35 Cont'd

The socioeconomic analysis detailed in the DEISs are narrow in view and incomplete. The analysis does not include cost to the taxpayer at every level of government to support LNG. Costs in response to micro and macro consequences, EG accidents, climate change, social costs to carbon, et cetera, of LNG development, that would negate claim to benefits, are also not included. PM01-36

Contributions and costs associated with climate change -- I'm sorry, infrastructure and flaring would be distinctly noticeable to residents and the public in the vicinity of the project affecting the viewshed of popular fishing areas, ecological tourism, and ecological recreation and tourism in general. These affects are economic detractors and are not accounted for in the economic analysis. PM01-37

Impacts from Annova LNG and cumulative impacts on bait shrimping are not addressed in the DEIS. Bait shrimping will be affected from increased turbidity and sedimentation from dredging, maintenance dredging, vessel traffic, stormwater runoff and hydrostatic testing. PM01-38

With regards to air and noise pollution -- annual stationary and mobile emissions equate to 536.4 tons of indirect greenhouse emissions, 363,643 tons of direct PM01-39

PM01-36 See response to comments CO7-3, and IND15-13.

PM01-37 With respect to climate change, see the revised analysis in section 4.13.3.9 of the EIS. Visual impacts from structures and flaring are addressed in section 4.8.5. The introduction of a new industrial facility at the proposed site, including the visual impacts associated with that facility, are factored into our analysis of potential Project impacts on tourism and recreation in section 4.9 of the EIS.

PM01-38 Potential impact on bait shrimping is included in our analysis of potential impact on commercial fishing. See section 4.9.2.3 of the EIS. In response to this comment and similar comments on the draft EIS we have added additional evaluation of potential impact on the bait shrimp industry to the final EIS, including cumulative impact on commercial fisheries in section 4.13.3.7. See also response to comment CO10-39.

PM01-39 Potential emissions from Project operation are addressed in section 4.11.1 of the EIS. With respect to carbon capture, see response to comment CO6-17.

1 greenhouse gases, and 6 tons of hazardous air pollutants. PM01-39 Cont'd
2 This would continue for 20 to 30 years or longer when we
3 need to reduce greenhouse gas emissions drastically as
4 warned in the fourth climate report by our own U.S.
5 government and the report by the Intergovernmental Panel on
6 Climate Change.
7 Annova LNG, if approved and built, would move us
8 in the opposite direction. FERC should require carbon
9 capture or deny the permit.
10 With regards to wetlands and habitat -- 52.8 PM01-40
11 acres of wetlands will be permanently destroyed and 5.1
12 acres will be disturbed. 409 acres of vegetation, and 53
13 temporary, will be destroyed which include Lomas that are
14 important for habitat and biodiversity.
15 This is contradictory to what the DEIS states.
16 The DEIS states -- have determined that the construction and
17 operation of the project would not significantly impact
18 vegetation, so that is inherently false in the DEIS. That
19 statement on the executive summary, page 5.
20 With regards to wildlife, 21 federally listed PM01-41
21 species will be affected, and this is not in accordance with
22 Section 7 of the Endangered Species Act which says,
23 "Jeopardization and continued existence of endangered
24 species or threatened species or result under the
25 destruction or adverse modifications of habitat of such

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PM01-40 As stated in section 4.5.5 of the EIS, although approximately 409 acres of vegetation would be permanently lost because of the Project, the region contains large quantities of similar vegetation communities. Therefore, we have determined that construction and operation of the Project would not significantly impact vegetation.

PM01-41 Section 7 of the Endangered Species Act does not require that a permit be denied based on potential impact on a federally listed species. However, Section 7 consultation is ongoing, and a final determination of species effect has not been completed. See also response to comment CO10-65.

species which is determined to be critical." As such the permit should be denied according to Section 7 of the ESA. PM01-41 Cont'd

And with regards to cultural values and resources -- the conservation and preservation efforts of the public has resulted in the Lower Rio Grande Valley National Wildlife Refuge, the Laguna Atascosa National Wildlife Refuge, Loma Ecological Preserve, wildlife corridor, Bahia Grande Restoration Project, the Federal Ocelot Recovery Plan and recent conservation of 3,200 acres on South Padre Island and several hundred acres along the Bahia Grande near Port Isabel. PM01-42

Conservation efforts such as these, demonstrate strong social and cultural values. Permitting LNG projects that continue the trend of impacting, indirectly or indirectly, or destroying the last remaining ecosystems conflicts with our regional, social and cultural values, and as such permits should be denied. And I'll leave it at that.

MS. SHIPLEY: My name is Alicja Shipley, it's A-l-i-c-j-a, last name S-h-i-p-l-e-y, and my address is 5101 Laguna Boulevard, Sunset Building, Apartment 207, South Padre Island, Texas 78597.

I also live in McAllen and spend time equally between the two places and I also go to Washington, D.C., where I live part of the year. Well, we have been with the

PM01-42 In response to this and other similar comments on the draft EIS, section 4.9.2.3 of the final EIS has added to include a discussion of the potential Project impacts on the various conservation initiatives in the Rio Grande Valley.

government for quite many years, but my husband is retired now so we spend the time in here, in Texas.

I'm here to just make a few comments regarding the project. I will study more thoroughly and then make it in writing, but I do not believe it's really a good project for this area because, first of all, it is a little too close to the areas where you have settlements. I believe at least a one mile too close, so from the engineering part of view, in case of danger there is a danger. PM01-43

Number two, I do not believe it will really bring much employment to the area. Temporary employment, yes, but in the long-range, no, because you don't need really too many people to operate it. You need about close to 200 maybe, no more, and those people will be brought from outside. So if it means employment for the local people, I don't think it really generates employment, however, since this area is very tourist area oriented, well, there may be much more employment if developed properly to bring people to this area and, you know, enjoy it. PM01-44

This is also one area that is really ecologically intact, which is a beautiful area, and that's what brings many people from all over the world including overseas to watch the birds and different species that are becoming extinct. PM01-45

These species will be endangered. They will not

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PM01-43 Reliability and Safety in general is evaluated in section 4.12 of the EIS. Siting requirements, including consideration of populated areas, is discussed in sect, 4.12.2.

PM01-44 See section 4.9 of the EIS for our evaluation of the potential Project impacts on temporary and permanent employment.

PM01-45 Potential Project impacts on tourism of the region, including birding and eco-tourism, is addressed in section 4.9.2.2 of the EIS. The potential Project impacts on endangered species is addressed in section 4.7 of the EIS.

survive much longer, and the whole ecology of the area will be destroyed. And it doesn't take a rocket scientist to realize that this is going to affect the air quality of the area and it may affect the air quality as far as along the valley, going as far as McAllen and further on. PM01-45 Cont'd PM01-46

Also, the -- so it will affect the health of the people I believe. The island may be less affected since the wind, it's going to blow more westward or so, but still it's going to affect the beauty of the island and beauty of the area. So I believe that if the local officials concentrate on developing some other venues of improvement of employment and attraction of the area, the area is to put emphasis on tourists and ecology and preservation of its nature, and look maybe for another area which would be more suitable for the project and further away. So, that's my comment right now, and -- well -- so -- PM01-47 PM01-48

MR. BOWARD: My name is Glenn Boward, it's G-l-e-n-n, B-o-w-a-r-d. I'm from Weslaco, Texas. Okay, the Draft EIS and FERC procedures are compromising public input. The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova, "before the end of the comment period." PM01-49

How is the public supposed to comment on information that isn't there? How will the public know that

PM01-46 Potential Project impacts on air quality, including emissions that could potentially affect human health, is evaluated in section 4.11.1 of the EIS.

PM01-47 Potential impact on the visual character of the areas surrounding the Project are addressed in section 4.8.5.

PM01-48 See our evaluation of Project alternatives included in section 3 of the EIS.

PM01-49 See response to comment CO6-2.

1 the required information is submitted and how will they be PM01-49
2 able to comment on it? The public comment deadline should PM01-50
3 be extended because the current partial government shutdown,
4 most federal agencies are unable to review, comment or
5 provide information to either FERC or the public.
6 The comment deadline should be extended for at
7 least two weeks after the required information is submitted
8 and made public. The FERC DEIS is not available in Spanish, PM01-51
9 the predominant language spoken in the Rio Grande Valley.
10 Wildlife and habitat, the Mitigation Plan is PM01-52
11 grossly inadequate. There is no Mitigation Plan whatsoever
12 for the three Lomas that are -- that's 409 acres that will
13 be mostly cleared, degraded and built upon. Lomas are
14 unique, geologic and biological formations of immense
15 habitat and wildlife value.
16 Annova's DEIS repeatedly dismisses or minimizes
17 their immense value and offers no mitigation. From a
18 biological perspective, this is criminal. For the wetlands PM01-53
19 that will be destroyed, 53 acres, Annova proposes to reflood
20 little San Martine Lake by opening up an abandoned -- by
21 opening up an abandoned earthen levee, something that only
22 two people with a shovel could open up.
23 Also, this area is already under protection by
24 the U.S. Fish and Wildlife Service. That the meaningful
25 mitigation and is no way commensurate with the wetlands

PM01-50 On February 7, 2019 FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

PM01-51 We disagree that the draft EIS was incomplete because it was not available in Spanish. During scoping and comment meetings, we had Spanish translators available.

PM01-52 See response to comment CO6-4.

PM01-53 See response to comment CO6-7.

impact Annova will cause. The Wetlands Mitigation Plan as proposed will violate the "No Net Loss" federal policy. PM01-53 Cont'd

The Draft EIS states, page ES-5, "We have determined that the construction and operation of the project will not significantly impact vegetation," and that, "No forested vegetation will be affected by the construction and operation of the project." PM01-54

Page 432, these are utterly false statements as any biologist not in the employment of Annova will attest. Also, the plan to revegetate 53 acres after four years of construction is unrealistic. Lomas are densely vegetated, few in number and can't be rebuilt or recreated. On page 448 it states, "We conclude that the impacts on the terrestrial wildlife and wildlife habitat will be minor." PM01-55

This conclusion is not supportive, and we strongly disagree. Annova's vegetation survey of the project site is inadequate. It states that there is no species present from the annotated county list of rare species from the Texas Parks and Wildlife Division, which is not true.

Also false is the statement that the Ebony Snake Eyes Vegetation Community does not exist on the site. The "Facility Lighting Plan" has significant wildlife implications and should be required by FERC as part of the EIS, not just done "before construction." PM01-56

PM01-54 See response to comment CO6-4.

PM01-55 See response to comment CO6-4.

PM01-56 See response to comment IND15-6.

Again, you leave the public out of the process. PM01-56 Cont'd

In return for agreeing to move the project site slightly eastward, the U.S. Fish and Wildlife Service agreed to surrender over 100 acres of Loma Ecological Preserve land. This formerly protected habitat needs to be mitigated. PM01-57

The Draft EIS states at page ES-5, "Sediment-laden water could be transported into the Bahia Grande and result in a potential for some increased turbidity and sedimentation effects on the channel and entrance." PM01-58

This is not acceptable for what was the largest wetland restoration in North America in 2005. Also, the Draft EIS is erroneous -- Draft EIS erroneously states that the Bahia Grande itself was a mitigation site. It was not.

How am I doing on time? All right. Let me skip some of that. I've already submitted it. The socioeconomic and cultural responses, the need for this project has not been demonstrated. There is no buyers for the LNG and no binding contracts for a project with so many negative impacts and unequivocal need of the product hasn't been shown. PM01-59

The socioeconomical analysis of the Draft EIS is narrow in view and incomplete. It does not include the costs for security, safety and emergency response that will include our local police, fire and medical services. These PM01-60

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PM01-57 See response to comment CO6-12.

PM01-58 See response to comment CO6-14.

PM01-59 See response to comment CO6-20.

PM01-60 See response to comment IND15-13.

costs will be covered through a Cost Sharing Plan and will include, but not limited to, training, emergency management, security, emergency equipment and patrol boats, firefighting equipment over time for police and fire personnel and LNG marine carrier security. PM01-60 Cont'd

The Cost Sharing Plan and Emergency Response Plan should both be included in the EIS for public review and comment. These are vital concerns for the public. Annova acknowledges that many of the workers can be brought in from the outside in Rio Grande Valley -- outside the Rio Grande Valley. Necessary taxes for services rendered by the Cameron County will not be paid by employees of Annova. PM01-61

In combination with possible tax abatements and workers residing outside Cameron County, Cameron County may experience similar hardships as in Cameron Parish, Louisiana, which despite 29 billion invested, the LNG facilities have -- the Cameron County -- Parish struggles to maintain basic services.

The Draft EIS says that neither construction nor operation would be expected to significantly impact tourism. There is no data to support this statement. Port Isabel, South Padre Island, Palmito Hill Battlefield, Laguna Atascosa Wildlife Refuge, are all very nature-tourist-dependent. PM01-62

Interview-type studies need to be done with

PM01-61 See response to comment IND15-13.

PM01-62 See response to comment CO6-15.

1 out-of-area tourists to meaningfully assess this impact. PM01-62 Cont'd
2 Petrochemical industrialization drives away nature tourism.
3 Compliance with the National Historical Preservation Act PM01-63
4 should be completed and included in the EIS, not done "prior
5 to construction."
6 If Annova is built, it would be one of the PM01-64
7 largest single stationary sources of nitrogen oxides, carbon
8 monoxides, volatile organic compounds, sulfur oxides,
9 particulate matter and greenhouse gasses in the Rio Grande
10 Valley.
11 To dismiss these proposed emissions because the
12 NAQS standards would not be exceeded ignores the
13 unacceptable reality that air quality would be permanently
14 worsened. The impact of hammering 7,817 concrete pylons 77 PM01-65
15 feet into the ground for up to 176 days will be a
16 significant disturbance to wildlife, and is not adequately
17 addressed in the Draft EIS. Okay.
18 MR. SANCHEZ-NAVARRO: Paul Sanchez-Navarro, PM01-66
19 P-a-u-l, S-a-n-c-h-e-z-N-a-v-a-r-r-o, and my comments are
20 just regarding wildlife and habitat, all environmental
21 questions. The Mitigation Plan is inadequate. It destroys
22 -- first of all it's destroying the last remaining Loma with
23 original vegetation that so many species need to -- in that
24 area, is the last Loma that has intact vegetation on the
25 south side of the channel.

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PM01-63 See response to comment CO10-44.

PM01-64 See response to comment CO6-17.

PM01-65 See response to comment CO6-18.

PM01-66 See response to comment CO6-4.

1 And, if you look at the area, you can tell first PM01-67
2 of all not looking at any of the specific legal
3 requirements, just anybody who cares about the planet would
4 see that there's damaged land already west where there's
5 dredged material west of the site. The Port Authority
6 should have leased that site where very intelligent
7 engineers could create an LNG plant.
8 Why people sit down and look at the last
9 remaining vegetation and think that that's the place to put
10 a refinery is just insane. So that's my first comment.
11 They should shift it completely west to build it on top of
12 the damaged land. No matter what the legality says of
13 anything else. There's damaged land on the channel that
14 could be used.
15 Now, given where they're going to put it, they're PM01-68
16 destroying the last little spot where if any ocelot that may
17 make it across the border, especially after the wall is
18 built in the river and valley, and wants to interact with
19 the population of ocelots north of the channel, it will not
20 be able to anymore with this plant here. They're proposing,
21 in part of the mitigation, to leave a little alleyway to the
22 left of the site, and that's inadequate.
23 It demonstrates the people who did the study
24 don't understand habitat management or ocelot activity,
25 especially given the amount of lights that would be produced

PM01-67 In Section 3.4 of the EIS we evaluate several other alternative sites along the BSC.

PM01-68 With respect to impact on the ocelot movement corridor, see response to comment CO10-57. With respect to issuance of the draft EIS before the facility lighting plan is complete, see response to comment IND15-6.

1 -- that will produce lighting 24-hours a day, and trying to PM01-68 Cont'd
2 channel a wildcat species into a little alleyway to then go
3 to a body of water that it has to swim across, and then
4 there's going to be two refineries on the other side -- it
5 just makes it impossible for that one last spot that
6 ocelots may be able to get across to.
7 Basically, in the context of the border wall as
8 well, we're writing off the future population of ocelot
9 species in the United States. There's about 50 ocelots
10 living in the Laguna Atascosa Wildlife Refuge. That
11 population will decrease as they won't be able to
12 genetically mix with the population in northern Mexico
13 because it's all one family -- multigeneration family, but
14 now they're being cut off because of the development here.
15 So that's the main thing.
16 And the study does not adequately address that at
17 all. There's no real mitigation you can do when you talk
18 about destroying the last remaining Loma.
19 And the problem with the way that we are doing PM01-69
20 this whole dynamic is that each LNG plant is being looked at
21 legally separately and there's nobody forcing it to be
22 looked in the context of three plants on one channel
23 affecting the same ecosystem.
24 The Lighting Plan for the facility has PM01-70
25 significant wildlife implications and should be required by

PM01-69 As noted in the comment, FERC is required to evaluate each separate project as proposed. However, we have included a cumulative impacts analysis in each EIS that evaluates the potential cumulative impacts should other projects be constructed in the same region, including the three proposed LNG projects. See section 4.13 of the Annova LNG final EIS.

PM01-70 With respect to the lighting plan, see response to comment IND15-6. With respect to sea turtles, see our analysis of potential Project impacts in section 4.7.1.4 of the EIS.

1 FERC, as part of the EIS, not just done before construction. PM01-70
2 That's one thing that is going to affect turtle nesting
3 activities even though it is a bit -- it's not far, but it
4 is a distance from South Padre Island, the nesting beaches.
5 There are nesting beaches in Boca Pilla as well
6 where turtles nest and that lighting will definitely impact
7 -- turtles are very sensitive to light and a plant is
8 specifically -- for safety reasons, has to have light 24
9 hours a day, and a lot of light. So we can write off the
10 turtle species that nest in South Padre Island and Boca
11 Pilla.
12 So, now we're writing off ocelots and we're
13 writing off sea turtles for private industry's LNG plants
14 where very few people are going to make a lot of money
15 selling gas, but all the rest of society has to forfeit
16 ocelot and turtle species in South Texas.
17 In return for agreeing to move the project site PM01-71
18 slightly eastward, the U.S. Fish and Wildlife agreed to
19 surrender over 100 acres of Loma Ecological Preserve land.
20 This formerly protected habitat needs to be mitigated. The
21 mitigation that's being negotiated right now is not
22 adequate, so it's being negotiated on land that's already
23 protected even though the lease is due to be up soon, it's
24 in a protected area and you shouldn't be allowed to
25 mitigate within something that's already protected.

PM01-71 See response to comment CO6-12.

Mitigation has a broader definition and the definition -- the word mitigation is being misused here. And I still say the whole project should be shifted completely eastward -- westward, if they're going to do it anyway. PM01-71 Cont'd

The DEIS states that sediment-laden water could be transported into the Bahia Grande and result in a potential for some increased turbidity and sedimentation affects near the channel. That will probably affect much more than what's stated here. The oyster and mussel populations and the dredging impacts to the South Bay need to be examined. PM01-72

The study talks about the sea grasses, oyster beds, it is not adequate study for that. And there's another area, the study's not done in the context of a border wall existing south of it. What you're basically going to create is a flood zone where water that traditionally drains across South Texas to the Rio Grande Valley, to reach the Rio Grande Delta, is now going to drain across and hit the wall and then be washed back, and then it's going to hit this area. And also during storms, because the channel is going to be dredged deeper, you're creating a situation where more storm surge -- there will be greater storm surge inside the channel. So where we're sitting right now could probably be underwater during every PM01-73 PM01-74

PM01-72 See response to comment CO6-14.

PM01-73 We disagree. The potential impact on seagrass and oyster beds is adequately addressed in the EIS.

PM01-74 We are not aware that the border wall would be constructed in such a way as to divert surface flow into the Project area. Annova is not proposing to dredge the BSC deeper, but to dredge a new berth and turning basin adjacent to the channel. See section 2.1.6 of the EIS.

hurricane or storm surge, because that study is not adequate to show what -- the increased depth of the ship channel and more storm surge over time will basically put this place underwater. PM01-74 Cont'd

The question of mitigation, mitigation should also be done for all parking lots. It wasn't clear to me in the study that the road going into the last Loma that's going to be destroyed will include crossovers underneath for crab species, for all the species that live in that wetland right now, to at least maintain them on both sides of the road. PM01-75

The road that's there now is low enough and is seasonally flooded so that's pretty much taken care of, but if that road is redone, then there's no -- it's not clear in this document that there will be passages underneath for crabs, particularly.

The proxy they used for fish habitat is inadequate. It's from Louisiana, which is a totally different ecosystem, so it needs to be -- that study should be completely redone. It should not be accepted as part of the study. The whole plan, in my opinion, does not reflect the objectives of the Texas Coastal Management Plan, and actually will create problems for the implementation of the Coastal Management Plan in the future. PM01-76

And I think that's it. The noise and the impact PM01-77

PM01-75 Impacts from parking lots and the access road are included in the total Project impact that is evaluated in the EIS, and the areas impacted by these features would be included in any mitigation. Annova is proposing to install crossings across the access road designed for ocelot movement. Annova is not proposing crossing for crabs.

PM01-76 The estimate of ichthyoplankton mortality was included as part of the analysis in the EFH assessment (see section 4.0 and 4.2.1.5 of the EFH Assessment in appendix F of the EIS). In its comments on the EFH Assessment the NMFS concurred with our conclusions. See response to comment CO10-32 for the NMFS response to this analysis. With respect to the Texas Coastal Zone Management Program, we have included a recommendation in section 4.8.6 of the EIS that Annova shall file a determination from the Texas Coastal Coordination Advisory Committee that the Project is consistent with the laws and regulations of the state's Coastal Zone Management Program.

PM01-77 The potential impact of Project related noise on wildlife is addressed in several sections of the EIS, including sections 4.6, 4.7, 4.8, and 4.11.2. It is beyond the scope of the EIS to address the Port of Brownsville's actions with respect to the three proposed LNG projects.

1 on all the wildlife around is another thing that is not
2 adequately addressed in the document, from construction all
3 the way to operation. And again, it shouldn't be allowed,
4 and I think that's more a question of the state government
5 and the Port Authority should have the responsibility to
6 manage these projects in context all together. Three
7 refineries plus a border wall, and how that's going to
8 impact Brownsville, and not just the profit of each
9 individual company, and that each individual company is
10 complying with the specific laws that are related to that.
11 Thank you very much.
12 MS. GALASSO: Okay. My name is Maria Galasso,
13 that's M-a-r-i-a, G-a-l-a-s-s-o, okay. And I live in Laguna
14 Vista, Texas, which is only about five miles from the
15 Brownsville ship channel where the LNG facility for Annova
16 Texas LNG and Rio Grande LNG will be located, so I'm pretty
17 close to where all the action is going to be so to speak.
18 So I'm just -- I just have a few comments that
19 I'm going to make because I'm going to work on a written
20 comment that I'll submit before the February 4th deadline.
21 The deadline's February 4th right, I think.
22 Okay, this DEIS is incomplete. There's a long
23 list of important information that FERC is requesting from
24 Annova "before the end of the comment period," but I really
25 feel strongly that there is no way for me, as the public, to

PM01-77 Cont'd

PM01-78

PM01-78 See response to comment CO6-2. On February 7, 2019, FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

1 comment if the DEIS is incomplete. It is a very lengthy PM01-78 Cont'd
2 document and throughout the document there are numerous
3 spots where, you know, it just says that FERC will continue
4 to coordinate with Annova for, you know -- to get the rest
5 of the documentation that they've requested and that is
6 leaving the public completely out of the review process for
7 all of the information that is missing.
8 The comment deadline should be extended for at
9 least two weeks after all the required information is
10 submitted and made public because it's not all there right
11 now.
12 My second comment is the Facility Lighting Plan PM01-79
13 has significant wildlife implications and should be required
14 by FERC as part of the EIS, not just again "before
15 construction," that's another thing that is pretty important
16 that the public should be able to comment on, and because it
17 is not a part of the Draft Environmental Impact Statement,
18 there is no way to make a comment on that. Again, you're
19 leaving the public out of the process.
20 In return for agreeing to move the project site PM01-80
21 slightly eastward, the U.S. Fish and Wildlife Service agreed
22 to surrender over 100 acres of Loma Ecological Preserve
23 land. This formerly protected habitat needs to be mitigated
24 because it is property that was previously protected as part
25 of Fish and Wildlife and it is a very important ecological

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PM01-79 See response to comment IND15-6.

PM01-80 See response to comment CO6-12.

site and it has -- that issue has not been addressed in the DEIS. PM01-80 Cont'd

Regarding migratory as well as nesting bird impacts, the DEIS says Annova would attempt to limit the clearing on the project site between September 1st through February 28th to avoid impacts. "Would attempt" is very weak and vague and there's actually no way to support that, so if we're meaning to say that Annova is definitely going to do the clearing between September 1st and February 28th, I think that would be a much stronger statement and that would be something that could be commented on. Since we don't really know when Annova will be doing the clearing, how can we comment on that? PM01-81

Noise and light impacts will result in an environment that wildlife, particularly migratory birds and nocturnal species such as ocelots, will avoid at the wildlife corridor and 437 acres within the Laguna Atascosa National Wildlife Refuge. The western portion of Loma Potrero that Annova proposes to leave as a corridor will be so heavily impacted by noise, lights, traffic and the 20-foot wide security road outside the primary secondary fence. PM01-82

Its ability to function, therefore, as a true wildlife corridor is, you know, I say laughable. You know, other people just say that it's doubtful, but it really is

PM01-81 See response to comment IND15-10.

PM01-82 Potential impacts from Project lights and noise are addressed in the EIS. As noted in the EIS, the barrier wall that Annova proposes to construct between the terminal site and the undisturbed wildlife corridor would be expected to reduce some noise and light impacts within the corridor.

1 beyond doubtful. You're going to clear it, you're going to PM01-82 Cont'd
2 put up lights, you're going to disrupt it in all different
3 kinds of ways and it's not going to be any longer --
4 especially for ocelots, a corridor. There's just no way
5 that it can be.
6 The need for this project still has not been PM01-83
7 demonstrated. And the Facility Lighting Plan has
8 significant wildlife implications again, and should be
9 required by FERC as part of the EIS, not just "before
10 construction." Again, you leave the public out of the
11 process -- that was a repeat, I think.
12 Let's see -- this economic analysis in the DEIS PM01-84
13 is narrow in view and incomplete. It does not include the
14 cost for security safety, emergency response that will
15 include police, fire, and medical services. The cost
16 sharing that's going to be required, and the Emergency
17 Response Plan, in particular, should both be included in the
18 EIS for public review and comment. These are vital
19 concerns for the public.
20 The Evacuation Plan in particular, in an area PM01-85
21 that has an island that is nearby, where if folks have to be
22 evacuated from an island they would have to be brought
23 towards the LNG sites in case of an incident -- I don't
24 think that that would be workable, so because we, as a
25 community, struggled concerning evacuation routes and

PM01-83 With respect to Project need, see response to comment CO6-20. With respect to the Facility Lighting Plan, see response to comment IND15-6.

PM01-84 See response to comment IND15-13.

PM01-85 Section 4.12.5.8 of the EIS includes a description of the requirements for an evacuation plan. Annova has not yet prepared the evacuation plan.

1 evacuation plans specifically, because the area has an PM01-85 Cont'd
2 island, it's kind of important that we see in writing what
3 the Evacuation Plan is going to be in case of an incident --
4 a safety incident that happens on the port road at one of
5 the LNG facilities or Annova LNG.
6 Again, these are vital concerns for the public.
7 Cumulative emissions of greenhouse gases by Annova would be PM01-86
8 more than six million tons per year -- no, 600,000 tons per
9 year along with six tons of hazardous air pollutants. This
10 would continue for 25 years or longer when we need to reduce
11 carbon emissions drastically much sooner, like before the
12 next 12 years is up.
13 This project, if approved and built, would move
14 us in the opposite direction. That Annova's contribution to
15 cumulative impacts on climate change cannot be precisely
16 measured is no reason for FERC to wash its hands of it.
17 FERC should require carbon capture or deny the permit.
18 There is too much information available to
19 experts in the field for FERC not to be a little bit more
20 involved in trying to measure what the harmful effects,
21 especially to the public will be, not to mention the planet.
22
23 The impact hammering of 7,817 concrete pylons 77 PM01-87
24 feet into the ground for up to 176 days will be a
25 significant disturbance to wildlife and is in no way

PM01-86 GHGs and climate change is addressed in section 4.11.1 and 4.13.3.9 of the EIS, respectively.

PM01-87 See response to comment CO6-18.

1 adequately addressed in the DEIS. PM01-87 Cont'd
2 Just two more things. The SpaceX launch site at PM01-88
3 Boca Chica is about six miles from the Annova site. The
4 impact reports that were done do not include the BFR rocket
5 that now Elon Musk is -- has announced to the world that
6 will be launching from the Boca Chica site. And the report
7 that FERC commissioned -- and that was included in each of
8 the projects stated that there was, you know, like less than
9 significant possibility of debris actually reaching the LNG
10 sites in case of a launch failure.
11 Well, that analysis and report that was completed
12 only included the Falcon Heavy and that's the smallest
13 rocket that SpaceX was putting up into space. Since then
14 the Falcon Heavy -- I think the report also included the
15 Falcon Heavy because they had the specs, but when we
16 insisted that the BFR should also be included in this
17 analysis, it was kind of -- I think the written response was
18 that the BFR was still visionary and the specs were not out
19 there to enable an analysis of what the debris radius would
20 be in the case of this larger rocket having a launch
21 failure.
22 So as late as last week there was another press
23 release concerning test flights that are going to begin in
24 March or April of 2019, so at this point it is not accurate
25 for FERC to allow the previous SpaceX analysis to go forward

PM01-88 See response to comments CO10-75 and CO10-73.

1 with these projects. It is -- it has been, what do they PM01-88 Cont'd
2 say, overtaken by events -- overcome by events, OBE, because
3 SpaceX is no longer thinking about using that small rocket
4 and that's the analysis that you included with the -- as
5 impact to these three projects.
6 And my last comment is the cumulative impacts of PM01-89
7 the three LNG projects that are proposed for the Brownsville
8 ship channel -- the cumulative impacts are substantial and
9 significant enough to warrant denial of some LNG development
10 in the Brownsville ship channel. All three LNG projects
11 should not be permitted. The findings in each of the
12 separate projects, you know, claim that the cumulative
13 impacts are significant and findings of significance means
14 that at least one, two should not be allowed. Thank you.
15 MR. BERG: My name is William Berg, that's
16 B-e-r-g, and I live in Brownsville, Texas. I'm making PM01-90
17 statements in opposition to Annova and in opposition to LNG
18 at the Port of Brownsville for a variety of reasons.
19 First, and probably most important, is LNG here
20 is -- involves destruction of greenfields. Unlike other LNG
21 and other fuel industrial facilities located at ports at
22 already destroyed land, which are brownfields, we're
23 destroying land, or Annova is planning to destroy land, in
24 an area where already 95% of habitat has been taken for
25 industrial and/or agricultural and/or transportation and/or

PM01-89 See response to comment CO6-19.

PM01-90 Thank you for your comment.

1 residential reasons.

2 This destruction of habitat can be avoided by

3 rejecting LNG and particularly, Annova here, at the Port of

4 Brownsville. Annova is particularly egregious in its

5 destruction. First of all, it involves destruction of

6 Lomas. In fact, the port has made a decision to allow

7 Annova to locate on the south side of the ship channel by

8 changing its lease to the National Wildlife Refuge of its

9 Loma Preserve.

10 And three of the Lomas that are in the Loma

11 Preserve, which stretch for about a mile or so, are now on

12 Annova's site. Annova will destroy them. Annova says in

13 the DEIS that they can be restored or some of them will be

14 restored after construction, but these Lomas -- these Lomas

15 took over 1,000 years to build in the first place due to the

16 works of nature and the comings and goings of seasons and

17 tides and floods and so on.

18 Annova can't do that no matter what they say.

19 Annova is located almost directly across the ship channel

20 from the underpass under Highway 48, which allows wildlife,

21 particularly mammals, to cross under Highway 48 safely.

22 They swim across the channel and then work their

23 way through the habitat of the National Wildlife Refuge on

24 the south side of the channel and ultimately to across the

25 Rio Grande where they meet their mates and whatever develops

PM01-90 Cont'd

PM01-91

PM01-92

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PM01-91 See response to comments IND9-14a and IND15-1.

PM01-92 See response to comment CO10-57.

1 the biodiversity of those animals living on the north side. PM01-92 Cont'd

2 Many of these animals are nocturnal -- PM01-93

3 particularly the endangered jaguarundi and the endangered

4 ocelot and they need to pass through now within a hundred

5 yards or so of an industry which is going to be working 24/7

6 with lights on, with noise. There are noise restrictions --

7 the sounds of Annova should be greater than the sounds of

8 the highway.

9 The sounds of the highway in the middle of the

10 night are a car now and a car then at -- in the wee hours.

11 The sound of Annova will be a continuous hum -- loud hum

12 that will interfere with shy animals wanting to get past,

13 and also the light emanating from Annova, which will be more

14 than moonlight.

15 In addition, the poor choice of a place to build, PM01-94

16 of all the greenfield in the area, the choice that Annova

17 has made, makes it one of the worst for habitat and we

18 expect that FERC -- hope that FERC, would recognize that.

19 In addition, there are the atmospheric effects. PM01-95

20 The accumulation of what's going to happen, both with

21 greenhouse gases and with other toxics in the air

22 particulates, lights -- excuse me, I mean flares -- lights

23 from flares, the cumulative effect of all three will be

24 great.

25 Additionally, if Annova is approved, it will PM01-96

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PM01-93 Potential impacts from Project lights and noise are addressed in the EIS. As noted in the EIS, the barrier wall that Annova proposes to construct between the terminal site and the undisturbed wildlife corridor would be expected to reduce some noise and light impacts within the corridor.

PM01-94 The potential impact of the Project on wildlife habitat, and ocelot habitat in particular, is addressed in the EIS. Potential alternative sites are addressed in section 3.

PM01-95 GHGs and climate change is addressed in sections 4.11.1 and 4.13.3.9 of the EIS, respectively. The Project's visual impacts from lighting and flaring is evaluated in section 4.8.5.

PM01-96 Comment noted. Potential impacts of the non-jurisdictional power line are addressed in section 4.13 of the EIS.

1 require the first high voltage power lines on the south side PM01-96 Cont'd
2 of the channel in the National Wildlife Refuge areas in
3 order to get the power that Annova will need to do its job.
4 I appreciate the time you're allowing me to spend
5 here and trust that FERC will make the wise decision. Thank
6 you very much.
7 MS. SANDEFUR: Okay, my name is Madeleine
8 Sandefur, that's M-a-d-e-l-e-i-n-e, last name Sandefur,
9 S-a-n-d-e-f-u-r. I live in Laguna Vista, which is about 7
10 miles as the crow flies from the planned project site.
11 I'm very concerned as a birder and PM01-97
12 environmentalist and Board member of Laguna Atascosa
13 Wildlife Refuge about the destruction that's going to happen
14 as far as habitat for our wildlife, certainly the ocelots
15 are a big concern. I've worked on ocelot projects for quite
16 a number of years.
17 I have several other concerns. And if you don't
18 mind, I would read some of them because a good friend of
19 mine did some wonderful points. They actually went through
20 the DEIS and looked at it and made some very good points.
21 So if you don't mind I will read some of them.
22 Annova's consultation with Fish and Wildlife PM01-98
23 Service with regards to the Migratory Bird Conservation Plan
24 and the Endangered Species Act should be finalized, as well
25 as consultations with National Marine Fishery Service under

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PM01-97 Thank you for your comment.

PM01-98 With regard to consultation with the FWS, see response to comment IND14-6. With regard to consultation with NOAA Fisheries see response to comment CO10-32.

1 the Magnuson-Stevens Fishery Conservation and Management PM01-98 Cont'd
2 Act.
3 All should be included in the EIS for public
4 review and comment. Requiring this information only before
5 construction, hence after permitting, is not acceptable as
6 it excludes the public. A total of 18 species that are PM01-99
7 federally listed as threatened, endangered or proposed will
8 be potentially affected by the project.
9 The DEIS states Annova will likely adversely
10 affect the endangered ocelot and jaguarundi. Many other
11 rare and important species will be impacted as well.
12 Section 7 of the Endangered Species Act as amended states
13 that any project authorized, funded or conducted by any
14 federal agencies should not jeopardize the continued
15 existence of any endangered species or threatened species
16 or result in the destruction or adverse modification of
17 habitat of such species which is determined to be critical.
18 The Fish and Wildlife Service biological opinion PM01-100
19 should precede FERC's final permitting decision as the
20 ocelot and the jaguarundi may be in jeopardy.
21 Another comment about the wildlife -- in fact, I PM01-101
22 left out that I'm also a sea turtle volunteer, so that's
23 another big concern of mine, because of the dredging that's
24 going to be taking place. The Mitigation Plan is grossly
25 inadequate. There's no Mitigation Plan whatsoever for the PM01-102

PM01-99 See response to comments CO4-8 and CO10-65.

PM01-100 See response to comments CO4-8 and CO10-65.

PM01-101 We disagree. Our analysis of potential impacts on sea turtles from the proposed dredging is included in section 4.7.1.4 of the EIS.

PM01-102 See response to comments IND19-14a, IND15-1, and CO10-58.

1 three Lomas, which are 409 acres that will be mostly PM01-102 Cont'd
2 cleared, graded and built upon.
3 The Lomas are unique geological and biological
4 formations of immense habitat and wildlife value. I just
5 learned earlier this evening that we only have about 13 and
6 they're going to destroy three of them. That's a lot. They
7 can't, because it's been taking hundreds of years for them
8 to actually -- to be built, Mother Nature built them. And
9 so how are you going to mitigate for that when it takes
10 hundreds and hundreds of years?
11 Anyway, the DEIS -- Annova's DEIS repeatedly
12 dismisses or minimizes their immense value and offers no
13 mitigation. From a biological perspective, this is
14 criminal. Wow, I really like that. For the wetlands that PM01-103
15 will be destroyed, 53 acres, Annova proposes to reflood
16 Little San Martine Lake by opening up an abandoned earthen
17 levee, something that could be done by two people with a
18 shovel.
19 Also, this area is already under the protection
20 of the U.S. Fish and Wildlife Service. That is not
21 meaningful mitigation and is in no way commensurate with the
22 relevant impacts Annova will cause. There are some others,
23 but I'm probably closer to five minutes, am I? Yeah, well, PM01-104
24 alright -- the other one that I'm really concerned about is
25 the fact that both Annova and Texas LNG have said that they

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PM01-103 See response to comment CO10-68.

PM01-104 See response to comments IND13-1 and IND13-2.

1 will get their feed gas from a level pipeline that will cut PM01-104 Cont'd
2 into the existing Valley Crossing Pipeline.
3 And yet the Valley Crossing Pipeline has said
4 that they will not supply gas for any LNG projects. So
5 where does that leave us? That means somebody is not
6 telling the truth, so that's a big concern for me.
7 The air pollution -- I think I mentioned, yes. I
8 think that's it. I will probably make written comments and
9 incorporate some of the other concerns that I have. I thank
10 you very much.
11 MS. PENA: My name is Marta, M-a-r-t-a, Marta
12 Elena, E-l-e-n-a, Pena, P, as in Paul, e-n-a, okay. I find PM01-105
13 that this Draft EIS for Annova is pretty inadequate. They
14 list a lot of items that are kind of you know, on the way or
15 to come and they don't really give any more information
16 about what the plan is to get the rest of that information.
17 They especially say in here specifically that the
18 FERC is requesting from Annova before the end of the comment
19 period, but we don't really know. How is the public
20 supposed to comment on information that isn't there? This
21 DEIS for Annova is not available in Spanish, which I find PM01-106
22 particularly disturbing, especially in this area. So that
23 was really unfortunate.
24 The Mitigation Plan is also really disturbing PM01-107
25 because there isn't really any Mitigation Plan specifically

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PM01-105 See response to comment IND14-6.

PM01-106 See response to comment CO6-3.

PM01-107 See response to comment IND9-14a and IND15-1.

1 for the Lomas, which, if you're not from this area then you PM01-107 Cont'd
2 don't know what Loma is. And they're very specific and
3 special habitat for this area where a vast amount of
4 endangered animals live on, including plants and other
5 wildlife, and you really -- there's isn't any mitigation in
6 here for that. And even if there was, I would also be
7 really interested to read that, how you mitigate for
8 something that is so like special and precise as Loma. Most
9 people don't know what it is.
10 And I know that I would be really happy to give
11 more information on that. I'm sure other experts in our
12 area would be happy to do so as well, if you need that
13 information. Let's see, the DEIS states on ES-5, "We have PM01-108
14 determined that construction and operation of the project
15 would not significantly impact vegetation."
16 I know forested vegetation would be affected by
17 construction and operation of the project. I think that is
18 a really inaccurate statement and it's also really
19 disturbing that that's actually written in there.
20 Annova's vegetation survey -- the project site is
21 also inadequate. It states that there are no species
22 present from the annotated county list of rare species,
23 which is not true. Also, false is the statement that the
24 Ebony Snake Eye Vegetation Community does not exist on the
25 site. That's not true.

PM01-108 See response to comment CO6-4 and CO6-5.

Regarding migratory as well as nesting birds impact, the DEIS says, Annova would attempt to limit clearing on the project site between September 1st and February 28th to avoid impacts. The wording, "would attempt," is really weak. I know that if someone told me I will try to attempt to save you from drowning, that that would not be adequate and that's basically what this is saying regarding all of these nesting birds and migratory animals. PM01-109

The DEIS states that the wetlands and the channel and mudflats at the terminal site are essential fish habitat, but there isn't any stated research or anything that's telling them how everything would be affected and they're using proxy data from Louisiana that is not apples to apples -- I'm just trying to summarize. PM01-110

There's a total of 18 species that are fully listed as threatened, endangered or proposed that would be potentially affected by this project and there just isn't enough information in this DEIS that states how -- it doesn't even mention them and how exactly they would be adversely affected. So that's also really disturbing to me, especially regarding the ocelot, which I hope you all will learn more about our precious ocelot -- one of only two colonies left. PM01-111

Noise and light impacts -- this is directly PM01-112

PM01 continued, page 48 of 110

PM01-109 See response to comment IND15-10.

PM01-110 See response to comment CO10-34.

PM01-111 Section 4.7.1 of the EIS does, in fact, identify the 18 federally listed species that could potentially be affected by the proposed Project, and includes an analysis of the potential impact on each.

PM01-112 The EIS does, in fact, say that some wildlife could be affected by noise and light from the Project. See the analysis in section 4.7 in general, and section 4.7.1.2 for the ocelot in particular.

1 affecting the ocelot. So the DEIS states that there really PM01-112 Cont'd
2 wouldn't be any affect to these species in regard to noise
3 and light. Well, these animals are basically nocturnal --
4 they are nocturnal, especially the ocelot is a nocturnal
5 animal, so they're highly sensitive to noise and light so as
6 a federally listed and protected animal on the Endangered
7 Species List that is also deeply disturbing.
8 Coming to socio-economical need -- Annova hasn't PM01-113
9 given any indication that they have buyers for their
10 product, so just from a business standpoint that should be
11 taken into consideration. There's also -- the DEIS says
12 that neither construction nor operation would be expected to
13 significantly impact tourism. So there's no data to support
14 that statement.
15 Cities like Port Isabel, where we're at right
16 now, South Padre Island, Palmito Hill Battlefield, Laguna
17 Atascosa -- this whole area is highly -- I mean, we live off
18 of ecotourism, so I think that that general statement is
19 just not true -- what's my time? Thank you, I'll try to get
20 to my main ones that I liked.
21 So Annova's site, as you all know, this is one of PM01-114
22 three LNG terminals that are trying to get approved. It's
23 only a quarter-mile from Rio Grande LNG, which of the three
24 sites, I believe, is the largest one. So -- and they're
25 within six miles of the SpaceX launch site. So I didn't see

PM01-113 With respect to Project need, see response to comment CO6-20. With respect to potential impact on tourism, including eco-tourism, see our analysis in section 4.9.2.2 of the EIS.

PM01-114 Section 4.12.5.7 of the EIS includes our analysis of potential SpaceX launch failures. See also responses to comments CO10-73 and CO10-75.

1 anything in here about a Launch Failure Plan, a Crisis Plan PM01-114 Cont'd
2 and I would like to know if that plan includes the new
3 SpaceX BFR, which is their new like ginormous rocket that
4 they recently talked about. So -- and that they have
5 confirmed they'll be using at SpaceX. So I don't know if
6 you all have been out to that site, that sure is so close
7 and of course, really close to a lot of people who live in
8 the area.
9 So, just in general, the whole SpaceX portion is
10 just kind of non-existent and it's grossly inadequate. And
11 I think that my last comment is just that the combined -- to PM01-115
12 kind of continue with my last one, just the combined effects
13 of all three -- the cumulative impact of these three
14 terminals all together. Just one is like horrendous to
15 think about, especially as someone who has lived in this
16 area. My family has been here since before Texas was Texas,
17 we've been here since the 1700's and to know that this is
18 being built and that possibly three, and that they're not
19 even taking the consideration to give us more information
20 about how the cumulative impacts could be, is deeply
21 disturbing to me and my family, but I'll try not to bring
22 emotion into this. I'm just stating facts from the DEIS
23 that I found inadequate and that's it. Thanks.
24 (Whereupon, the scoping meeting was adjourned.)
25

PM01 continued, page 50 of 110

PM01-115 Potential cumulative impacts from construction of the three proposed LNG projects, as well as other projects that could be constructed in the region, is addressed in section 4.13 of the EIS.

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: Annova LNG Project

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14

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16 Docket No.: CP16-480-000

17 Place: Port Isabel, TX

18 Date: Thursday, January 10, 2019

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

20 transcript thereof for the file of the Federal Energy

21 Regulatory Commission, and is a full correct transcription

22 of the proceedings.

23 Mike Williams

24 Official Reporter

25

1 FEDERAL ENERGY REGULATORY COMMISSION
2 ANNOVA LNG COMMENT PROJECT
3 Docket Number: CP16-480-000
4
5 SCOPING MEETING
6
7 Port Isabel Convention Center
8 309 E. Railroad Avenue
9 Port Isabel, TX 78578
10
11 Thursday, January 10, 2019
12 5:00 p.m.
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1 SPEAKER LIST
2 Ken Waller
3 Alma G. Leal
4 Lucida Wierchga
5 Jose Sanchez
6 Hemant Bhahhakta
7 Mary Elizabeth Hollmann
8 Amit Patel
9 James Bathurst
10 Marianne Poythress
11 Gerardo Ruiz
12 Brianna Gaytan
13 Amanda Garcia
14 Scott Gangel
15 Sarah Merrill
16 Laurel Steinberg
17 Karen Boward
18 Maile Worrell
19 Larry Hollman
20 Jose Angel Ramirez
21 Anita Ramirez
22 Jim Chapman
23 Jason Fry
24 Rebekah Hinojosa
25 Kenneth Saxon

1 SPEAKER LIST (CONTINUED)
2 Xandra Leal
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P R O C E E D I N G S

MR. WALLER: My name is Ken Waller, that's K-e-n W-a-l-l-e-r. I am President of the Long Island Village Owner's Association. Several years ago, we put out a proclamation that we were against the LNG for the area, mainly because of our safety reasons. PM01-116

We have a swing bridge that is our only way off of the property and at least with Rio Grande LNG, they are building us into their blast zone, so we have 1,024 lots, approximately 2,500 residents and we really have no way off of that island if there is any kind of an explosion or problem with the LNG plants.

I'm not really against the LNG plants, but I am against them building us into their blast zone. I don't know what else I can say to this other than that. I mean I can say for us it's mostly -- a safety issue and because that bridge is our only way off and if there is a problem we can't get off. All right. Thank you.

MS. LEAL: Okay. My name is Alma G. Leal, A-l-m-a, initial G, Leal, L-e-a-l. I'm here because I am in total opposition to FERC granting a permit for Annova to set up its facility here. Sorry I had a mint, and there are several reasons. I have been very involved in protesting all the LNG facilities and so I have some of my major concerns.

PM01-116 With respect to comments specific to the Rio Grande LNG project, see the EIS and comment responses in FERC docket number CP16-540-000. With respect to the Annova LNG Project, there is no designated blast zone for the LNG terminal, which is proposed to be located about 5 miles from Long Island Village. However, a small portion in the southeast corner of Long Island Village is located within the Accidental Sandia Hazard Zone 3, and the entire Long Island Village would be located within the Intentional Sandia Hazard Zone 3, associated with outbound (loaded with cargo) LNG carriers that would transit the BSC. See discussion in section 4.12.3.4 of the EIS.

1 I don't really believe that -- well, your
2 statement indicated that there may be permanent wetland
3 destruction -- like 52.8 acres. I don't really believe that
4 any amount of mitigation would totally restore any
5 destruction by the facilities. I found that some of the
6 statements in your report were very vague such as minimal
7 and there were some other terms that I didn't think really
8 would make anything enforceable if there should be any
9 destruction and I don't really believe that it's something
10 that nature has created over years as a natural habitat for
11 wildlife and brush and all that can be mitigated quickly and
12 in a way that would restore the wildlife that may have died
13 off or left.
14 I'm thinking more died off because some of what
15 we have is endangered species such as ocelots that depend on
16 the property that they have been born into and grown up in.
17 Also, I was greatly concerned on the statement indicating
18 that 409 acres would be permanently affected under
19 vegetation and I think that is totally -- I don't think --
20 it is totally unacceptable.
21 I don't think anyone can foresee the future and
22 actually believe that any attempts to mitigate this
23 permanent destruction could be undone. So, I have a great
24 concern that I don't believe that mitigation would actually
25 solve our concerns of destroying wildlife habitat and

PM01-117

PM01-117 Comment noted. In the EIS we acknowledge that some impacts would be permanent. While Annova has proposed some mitigation, the mitigation would compensate for some impacts and reduce their significance, but not necessarily restore all environmental impacts. See also response to comment CO10-68.

1 vegetation that has been here for decades or centuries. PM01-117 Cont'd
2 Another big concern that I have is in the area of PM01-118
3 wildlife and aquatic resources. I have my own wildlife
4 refuge for which I receive no compensation but spend a lot
5 of money to maintain it. It's something I want to hopefully
6 leave to a conservation group -- that's how much I believe
7 in maintaining wildlife and doing everything possible to
8 keep it so I'm really upset that these companies are coming
9 in and have -- I don't think they've -- they are invested
10 the way we are here, so any removal or destruction of
11 wildlife probably doesn't mean the same to them as it means
12 to those of us who grew up here and appreciate our local
13 resources and the kind of wildlife, the birds, the ocelots,
14 the jaguarundi, all those animals that you don't find
15 elsewhere.
16 I mean we maintain that, and we depend on it as
17 far as for our ecosystems. So, I feel that some of the PM01-119
18 recommendations in this report are vague and unenforceable.
19 I mentioned earlier terms that are used such as, "minimize,
20 attempt to do something, occasional destruction, something
21 that might be negligible, short-term, minor," -- those terms
22 are so hard to define.
23 How do you tell Annova or any of the other LNG
24 companies when you tell them minimize destruction? To them
25 minimize might mean you keep 5 percent of the vegetation

PM01-118 See our evaluation of Project impacts on wildlife and aquatic resources in sections 4.6 and 4.7 of the EIS.

PM01-119 We use a number of terms in the EIS to describe potential environmental impacts, some of which are estimated based on the proposed action and best available information. If the Project is approved, any statement or commitment that Annova has made in its application or subsequent filings, and any FERC staff recommendation made in the EIS, would become a condition of approval. See our recommendation Number 1 in section 5.2 of the EIS.

1 versus what I believe should be 100 percent because our PM01-119 Cont'd
2 wildlife depends on it for survival and again so do the
3 people who use these resources in their jobs, careers,
4 birding and so on that we have here.
5 So, those are my concerns -- the vagueness in
6 having this company come up with a Mitigation Plan that
7 would be enforceable.
8 Very quickly, some of the other things is that PM01-120
9 where it says no affect or may affect, I think that's
10 unacceptable and vague. We can't foresee the future to tell
11 carrier -- LNG carrier captains that they have a
12 responsibility to be careful does not mean that there will
13 be no accidents that affect us profoundly and so I feel any
14 impact can be devastating and I think any kind of
15 destruction -- anything in the report that says minimal or
16 permanent destruction, but that it will be minimized through
17 a mitigation plan, I think that is totally unacceptable.
18 And my last statement is cumulative impact and PM01-121
19 layers of protection. I don't think any amount of
20 protection from possible hazards, accidents and so on
21 guarantee that something will not happen, and that people's
22 lives will not be at stake and again, bottom line is
23 destruction of beautiful pristine areas that so many people
24 depend on and that our wildlife depends on and that we're so
25 proud of.

PM01 continued, page 58 of 110

PM01-120 See response to comment PM1-119.

PM01-121 See our assessment of protection from internal and external hazards and accidents in section 4.12 of the EIS.

And so, I want to emphasize that I'm totally against any permit for any amount of building by Annova or any LNG companies. Thank you. PM01-121 Cont'd

MS. WIERENGA: My name is Lucinda Wierenga, that's L-u-c-i-n-d-a Wierenga, W-i-e-r-e-n-g-a. I live on South Padre Island. Yes, I am very opposed to LNG. My business -- I teach sand castle lessons, is very dependent on tourism and I fear that Annova and the other companies coming in -- the cumulative affect of all of that technology will have a very detrimental affect on my business and on the business of tourism which is our only business really on South Padre. PM01-122

I am concerned about the mitigation -- proposed mitigation is not sufficient and there's -- it's so vague, there's nothing specific about what they're going to do to make up for the habitat that will be lost so I'm very concerned about that. And I'm also very concerned about what is going to happen to the Brownsville Ship Channel. PM01-123 PM01-124 Every time one of those big tankers goes in and out, from what I understand, they're going to have to stop all other traffic in the channel for hours at a time and that, I think, is the lifeblood of what we have going on South Padre Island.

And the sports fisherman, the kayakers, you know, that's what we have to offer to people and so I'm very PM01-125

PM01-122 Thank you for your comment. We address the potential impact on tourism from the Annova LNG Project in section 4.9.2.2 of the EIS, and cumulative impacts from the three proposed LNG projects in section 4.13.3.7.

PM01-123 See response to comment PM1-119.

PM01-124 It is estimated that potential delay times for small vessels in the BSC could be from 0.5 to 1.5 hours for a transit of an LNG carrier in the BSC, depending on the direction of travel and location at the time of entrance by the LNG carrier. See section 4.9.10.2 of the EIS.

PM01-125 Potential impact on recreational fishing and other users of the BSC and Lower Laguna Madre is evaluated in sections 4.8.4.2 and 4.9.2.2 of the EIS.

concerned about the danger. All right. PM01-125 Cont'd

MR. SANCHEZ: Good afternoon, my name is Jose Sanchez, J-o-s-e S-a-n-c-h-e-z. And I guess my comments -- I have several comments. You know, first of all and primarily, I think that the focus ought not to be on fossil fuels at all anyway. It should be on wind, solar and even tidal, considering where we are. PM01-126

As it is, you know, I don't think that the putting in something that would end up looking like -- we would end up looking like Corpus Christi or God forbid, even Three Rivers, you know, right over here, it would really, I think, impact very badly on -- especially the tourism income because a lot of what we depend upon here, including myself, is ecotourism, you know. PM01-127

And I think that it would really blight not only the physical scenery but also have a very negative impact on things like even the delicate species that we have on the coastal area and the wetlands near the Laguna Atascosa, but even beyond that, like you know, other things that are here. PM01-128

Likewise, the proximity to SpaceX, which is a whole other issue, you know, just makes it even more complicated and volatile. Aside from all of those sorts of issues, just economically I don't think it makes sense because, ultimately, it only brings jobs for a few people, for some people for a while, lower level of jobs. PM01-129 PM01-130

PM01 continued, page 60 of 110

PM01-126 As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

PM01-127 The potential impact on tourism from the Annova LNG Project is addressed in section 4.9.2.2 of the EIS.

PM01-128 The potential impact on scenery, sensitive species, and wetlands from the Annova LNG Project are addressed in the EIS in sections 4.8.5, 4.7, and 4.4, respectively.

PM01-129 Section 4.12.5.7 of the EIS includes an evaluation of potential issues related to proximity of the Annova LNG Project to the SpaceX facility.

PM01-130 Section 4.9 of the EIS includes an evaluation of Project-related jobs, including temporary jobs during construction and long-term jobs during operation, and where the workers may originate from.

I don't believe that the people that are going to be having the higher level jobs are going to be from around here, you know -- maybe a handful but mostly are going to be from somewhere else and the people that are going to have the other jobs, you know, are going to be -- they're not going to be so long-lasting. PM01-130 Cont'd

So ultimately, because of the impact on ecotourism, the environment in general and just the general economic thrust of it, I think is in the exactly wrong direction, not to mention that we don't get any of the benefits. It's all going to China or wherever, some other place, who knows where, but we don't get it anyway and it's messing up the place -- I don't even like it that they're messing up the places over in George West and Kennedy and Three Rivers and all that, you know, in that whole area -- this is the other end of it completely opposed. Was I clear? Okay, thank you so much. PM01-131

MR. BHAHHAKTA: Hemant Bhahhkta, H-e-m-a-n-t, last name is Bhahhakta, B-h-a-h-h-a-k-t-a. So, I guess I'm here for LNG, for it to get approved and I wanted to find out more information about it. I wasn't sure what the meeting was about but yeah, I don't have anything against it, and I think it will bring a better economy for Brownsville, Port Isabel, South Padre Island, at the same time better education coming from them once the economy gets PM01-132

PM01-131 Thank you for your comment.

PM01-132 Thank you for your comment.

1 better everything should get better, right? Besides that, I PM01-132 Cont'd
2 don't have anything else to say. Thank you.
3 MS. HOLLMANN: Okay. My name is Mary Elizabeth
4 Hollmann and to spell it the last name is H-o-l-l-m-a-n-n,
5 Elizabeth E-l-i-z-a-b-e-t-h. Thank you. And I would like PM01-133
6 to comment specifically about the Annova plant that's being
7 proposed to be built at the Port of Brownsville.
8 I am very concerned that it's going to be one of
9 three plants. I am concerned that, from my understanding,
10 the Environmental Impact Statements are for each individual
11 plant and we're not looking at the total situation. I'm
12 concerned that the SpaceX site is only six miles away from PM01-134
13 this, and I know the Corps of Engineers have said that
14 that's not an issue, I feel that there is an issue,
15 especially if there were to be debris falling.
16 I am very concerned about the impeding wildlife PM01-135
17 being interrupted. I know that somewhere in the document it
18 had referred to the fact that there would be limited impact
19 on animal species, but they did acknowledge that the ocelot
20 and the jaguarundi might be affected. It's not going to be
21 a might be, that is their migratory path and I don't believe
22 that the mitigation that was listed is adequate.
23 This is going to be a problem. Also,
24 economically in our region and environmentally. I am a PM01-136
25 former school teacher and I have the beginning of asthma

PM01 continued, page 62 of 110

PM01-133 See response to comment IND21-1.

PM01-134 See response to comment PM1-129.

PM01-135 See response to comments IND9-14a and IND15-1.

PM01-136 The potential impact on air emissions and related human health is addressed in section 4.11.1 of the EIS.

problems and I know that the Trump administration is loosening air quality controls and I see this as a way to put more pollution in our air and affect our health. Thank you. PM01-136 Cont'd

MR. PATEL: My name is Amit Patel from Brownsville, Texas and I'm here to -- it's A-m-i-t, last name Patel, P-a-t-e-l. I'm here to support LNG since I'm a business owner -- I'm a hotel owner and I think it's just not going to benefit hotels, but all the businesses around Brownsville, restaurants, you know, you name it like even the apartments, lodging, everything, is going to be benefitted from LNG's workers, you know, that are going to be coming into work, so I'm all about it, that's it. Thank you. PM01-137

MR. BATHURST: My name is James Bathurst, it's B-a-t-h-u-r-s-t and are you recording. All right. I am vehemently opposed to the LNG project as a resident of this area. We first came here in 1995 because of the natural beauty of the area and the relatively pristine environment and I'm a resident at Long Island Village, which puts me approximately two to two and a half miles away from where these things will be. PM01-138

I'm also a retired boat captain. I am well aware of the Coast Guard regulations for how the ships coming and going with LNG are to be dealt with and as far as the PM01-139

PM01 continued, page 63 of 110

PM01-137 Thank you for your comment.

PM01-138 Thank you for your comment. The proposed Annova LNG Project site is just over 5 miles from the Long Island Village.

PM01-139 Potential impacts from the Annova LNG Project on other vessel traffic in the BSC is addressed in section 4.9.10.2, and potential cumulative impacts from the three proposed LNG projects is addressed in section 4.13.3.7.

1 standoffs and that which will effectively close the PM01-139 Cont'd
2 Brownsville Ship Channel to any recreational boating. Any
3 time that they are in -- and I understand what the numbers
4 are, so it's going to be more closed than open if these are
5 allowed to do that.
6 The fact that we are so close puts me also in a PM01-140
7 position for air pollution and it is very apparent from
8 other LNG installations that there will be particulates that
9 are put into the air and whether or not they're within
10 someone else's idea of acceptable -- I have asthma. They're
11 not going to be within my idea of acceptable.
12 We go out on our boat most days and we go out PM01-141
13 there to -- sorry (emotional moment) to enjoy the natural
14 beauty, watch the dolphins, see the birds and from having
15 dealt with the oil spill from Deep Water Horizon, I'm aware
16 of the longstanding -- I'm sorry, potential for damage.
17 I was here when the causeway got hit by the barge
18 and access to the island was cut off for almost four months
19 and saw the economic devastation to the entire area, not
20 just South Padre Island and Port Isabel and I hate to think
21 of what it will be when there is a spill -- not if there is
22 a spill.
23 You can't have that much ship traffic coming and
24 going and not have economic and environmental impact to the
25 area and it will take away the reason we moved here. I gave

PM01 continued, page 64 of 110

PM01-140 The potential impact on air emissions and related human health is addressed in section 4.11.1 of the EIS.

PM01-141 The safety and regulatory requirements of LNG vessels that would be traveling within the BSC is addressed in section 4.12.3 of the EIS.

reasons before at one of these and managed to stay better composed but I can't believe that as residents here, we have to continually beg to not have a wonderful way of life devastated by the potential harm. I guess I don't have anymore to say.

MS. POYTHRESS: Hi, my name is Marianne Poythress, it's spelled M-a-r-i-, there's no y, it's one word, M-a-r-i-a-n-n-e and the last one P-o-y-t-h-r-e-s-s. I wanted to start with my concerns about the location of the site is on a National Historic Preservation Act contribution. PM01-142

It says that, "No prior construction should be done on an area until it's been adequately surveyed," and what has been done so far of sticking a shovel in the ground 36 times is not a very good analysis of the area and the Carrizo Camargo Tribe has submitted a lot of comments concerning the area and the tribes -- they found some very special graves in some other areas and this was a very popular area for the tribe and more effort needs to be done to protect the sacred lands of the tribe.

And so that's one of my big concerns is attention has not been paid to this and it's not being respected and once it's dug up, all archeological benefits are lost. So, along with that idea, the Mitigation Plan for wildlife and habitat is inadequate. This facility is being built in a PM01-143

PM01-142 With respect to the archeological survey that has been conducted for the Annova LNG Project, see response to comment IND20-6. The Carrizo/Comecrudo Tribe of Texas has submitted comments on the Texas LNG project, but not the Annova LNG Project.

PM01-143 See response to comments IND14a and IND15-1.

Lomas area and they're very unique and provide a wonderful habitat for diverse wildlife and in the DEIS, this has sort of been minimized that it's not all that important and there's no -- you know, value and they offer no mitigation plan for the loss of the Lomas. PM01-143 Cont'd

And, so even if you tried to reconstruct or re-habitat the area, the Lomas took a century to create, it's not something you can come back in and get the life back into it and it needs to be respected.

In terms of the Wetlands Mitigation Plan, it violates the No Net Loss federal policy and it has -- the DEIS says it does not significantly impact vegetation and there's no forested vegetation that will be affected by the project and this is false. PM01-144

So, as I said a plan to re-vegetate the 53 acres is unrealistic because of the damage that would have been done and cannot be rebuilt. Okay, next. The DEIS states on page 5, that sediment laid in water can be transported into the Bahia Grande and result in potential -- some potential increased turbidity and sedimentation. PM01-145

This is not acceptable because the Bahia Grande was the largest wetland restoration project in North America when it was restored in 2005 and this would seriously harm the work that was done to the restoration project. A lot of effort and money went into restoring it which helped the

PM01 continued, page 66 of 110

PM01-144 See response to comments CO10-68 and CO6-4.

PM01-145 Section 4.3.2.2 of the EIS describes the potential impact on the Bahia Grande from sedimentation from Project dredging.

1 health of the people living around the area because there PM01-145 Cont'd
2 was a lot of blowing sand and dust that was causing issues
3 in the area.
4 Next, the Endangered Species Act says that you PM01-146
5 should not jeopardize the existence of an endangered species
6 or threatened species and the ocelot and jaguarundi will be
7 in jeopardy and so this project should not go forward for
8 that reason at least.
9 Next, for all this destruction that's going to PM01-147
10 come about as a result of this project, there's been no
11 demonstrated need for this project. There are no buyers, no
12 binding contracts, and the negative impacts for something
13 that has no existing value is a travesty to do that kind of
14 harm.
15 Okay, now given that human beings that live in PM01-148
16 the area, the air quality will be permanently worsened
17 during its existence and while TCQ may allow the addition of
18 the wide breadth of carbon monoxide and nitrate oxides,
19 volatile organic compounds and all the rest of that, it will
20 still affect the people's breathing and this is an area
21 where there are vulnerable populations -- I'm one of those
22 that has health issues, and we will be seriously impacted by
23 the presence of this.
24 Then we have safety. So, the Annova site is a PM01-149
25 quarter mile from the Rio Grande LNG site, so it's within

PM01-146 See response to comment CO4-8.

PM01-147 See response to comment CO6-20.

PM01-148 The potential impact on air emissions and related human health is addressed in section 4.11.1 of the EIS.

PM01-149 See response to comment IND15-5.

zone 1, so if something happens in one of them, the other one is going to be severely affected and could compound the problem spreading to the other one. PM01-149 Cont'd

Also, SpaceX launch site is six miles from the Annova terminal site, and the question then is, where's the launch failure analysis? Did it include the SpaceX BFR rocket which is larger than all existing rockets and its debris field would be encompassed by the Annova site? PM01-150

So, there are serious risks to having SpaceX and Annova so close to each other and then close to all the other LNG facilities and it would be a serious catastrophe if something happened between those and this is where I live, you know, I'm going to be affected by all this and lives will be affected by all this.

So, in conclusion, this should not be approved and there's no need for it and the harm that would be done seriously outweighs the lack of benefit from this project. Thank you.

MR. RUIZ: My name is Gerardo Ruiz, that's G like Gerard, G-e-r-a-r-d-o, Ruiz, R-u-i-z. Okay. I just want to say I vehemently oppose the construction by Annova or any of the LNG companies. I know what it is going to do to our environment, and I am quite surprised that nothing was put out in Spanish which is sad, because that means that the majority of the population here is not getting the PM01-151

PM01-150 See response to comments CO10-73 and CO10-75.

PM01-151 See response to comment CO6-3.

1 information they need. That's basically representation or PM01-151 Cont'd
2 contamination without representation that is.
3 And again, it's going to affect the environment, PM01-152
4 meaning not only the environment outside of our community,
5 but everything out as well as the species and their habitats
6 that are going to be destroyed, as well as what happens to
7 the human species.
8 The plans for mitigation seem to be inadequate, PM01-153
9 but covers over 409 acres of Lomas where a lot of these
10 species like the ocelots and mainly that one, and well
11 others as well, that may be affected. And so, I definitely
12 want to let FERC know that they need to research over what
13 they're trying to allow with Annova. And as far as jobs --
14 we all know that it's mainly going to be from outside the PM01-154
15 area. It's going to minimal for anybody here locally. The
16 profits are going to be for the few and not for the
17 majority, which in this poor community we don't need.
18 We're going to be destroying the future economy
19 of our area by destroying our environment. I'd also just
20 like it not to become another decrepit squalor as it is in
21 the Rust Belt and where it might become another cancer
22 alley, like it is in New Orleans and in southern Louisiana
23 and with the dead zone that they have outside the
24 Mississippi that goes out into the Gulf.
25 I am so scared of that happening here, it's my

PM01-152 Potential impacts on the environment, including species and humans, is evaluated in various sections of the EIS.

PM01-153 See response to comments IND9-14a and IND15-1.

PM01-154 Section 4.9 of the EIS includes an evaluation of Project-related jobs, including temporary jobs during construction and long-term jobs during operation, and where the workers may originate from. Potential impact on the regional economy, including tourism, commercial fishing, and recreation-based business is addressed in section 4.9 of the EIS.

home, my community. I want to save what we have here, it's rare. There's so much of that kind of disgustingness, sadly, in Port of Houston, let's say, or Corpus Christi, where it's just growing like a cancer and we're one of the last areas left that is pristine, that is beautiful in our eyes, and it's needed for the future of our state, our community and we need to save what we can. That's it, okay thank you. PM01-154 Cont'd

MS. GAYTAN: Okay, my name is Brianna Gaytan, B-r-i-a-n-n-a, G-a-y-t-a-n. Okay, so I have a couple concerns regarding the Annova LNG building. Well first off, their statement is not available in Spanish, which is predominantly spoken down here. So I feel it is unfair to those who do not speak English, because they won't have a chance to understand like what is going on besides it being carried by word of mouth. PM01-155

Another concern I have is -- is that energy is just downright dirty business. I don't think it has a place here in the Rio Grande Valley. PM01-156 It would be disrupting the wildlife and the native habitats for lots of animals such as the ocelots, different birds which are popular for tourism. So if you disrupt that and you fragment more of our landscape, it's just being a big disruption. PM01-157

Another part is regarding the dirtiness in terms of waste and pollution, such as the methane involved in PM01-158

PM01-155 See response to comment CO6-3.

PM01-156 Thank you for your comment.

PM01-157 Potential impact on wildlife, including ocelots and birds, is addressed in sections 4.6 and 4.7 of the EIS.

PM01-158 Potential Project impacts on air quality such as criteria pollutant emissions that could potentially affect human health, are evaluated in section 4.11.1 of the EIS.

1 preserving the product itself. And what's it called -- and PM01-158 Cont'd
2 just the fumes, what's going to happen to our environment
3 afterwards, like we might become one of those cities where
4 all of us get sick all of a sudden, you know.
5 Sorry -- and so I just don't think it has a place PM01-159
6 here. It's a good idea, but maybe just not here where --
7 there's too much wildlife. We are like close to the best --
8 having the most wildlife, the most abundant besides Mexico,
9 so I just don't think it's a good idea, okay.
10 MS. GARCIA: Amanda Garcia, A-m-a-n-d-a,
11 G-a-r-c-i-a. Basically, I'm totally against any of LNG PM01-160
12 projects being built here at the island. I used to come
13 here a lot as a child and I used to have a really fun time
14 at the beach, but I've stopped coming these past few years
15 because it's just really awful, it's not very clean anymore
16 and I feel that LNG would just add to that uncleanliness.
17 And the island itself is pretty much like a PM01-161
18 tourist spot. We have a lot of the winter Texans coming
19 down here. We have a lot of people coming for Spring Break.
20 And LNG, with their projects, would just hurt the
21 environment. There would be a lot more of those, you know,
22 dead fish, dead animals everywhere. It's not very sightly
23 for those people visiting and I feel that it would hurt the
24 economy.
25 And there's a lot of -- there's a risk of these PM01-162

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PM01-159 Thank you for your comment.

PM01-160 Thank you for your comment.

PM01-161 Potential impact on the environment from construction of the Annova LNG Project is addressed in various sections of the EIS. Potential impact on the economy is addressed in section 4.9.

PM01-162 See response to Comment PM01-158

1 toxic fumes being released from the LNG factories and that PM01-162 Cont'd
2 would hurt a lot of the -- well, pregnant women to begin
3 with. It would cause anomalies in the fetuses, but going
4 back to the winter Texans coming down here, it would hurt
5 their lungs, and a lot of them come down here because the
6 air is so clean and fresher by the island. And you know,
7 hurting their lungs and things like that it's -- that would
8 cause a lot more hospital bills and things like that and
9 they would tell their friends about it and that would also
10 hurt the economy.
11 And, also, I just think that we should care about PM01-163
12 the environment a little bit more down here. A lot of
13 people in the valley don't really know much about helping
14 the environment. And the LNG statement isn't even available
15 in Spanish, so I feel that keeping that information from the
16 largely Hispanic community is quite sketchy.
17 I feel that it's kind of a little racist here, PM01-164
18 especially considering this is such a low-income nation or
19 low income space, city kind of place. A lot of people just
20 see it as a way to get more jobs down here, but they don't
21 truly understand what LNG is doing, and so keeping the
22 information from them in Spanish about what it could cause
23 is not fair to them.
24 And it also hurts a lot of the animal species PM01-165
25 here. We already have a pretty much, almost extinct group

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PM01-163 See response to comment CO6-3.

PM01-164 See response to comment CO6-3.

PM01-165 Potential impact on the ocelot is addressed in section 4.7.1.2 of the EIS, as well as in the Biological Assessment. See also response to comment CO4-8.

1 of ocelots that won't succeed pretty much. There is PM01-165 Cont'd
2 probably no way to save them anymore, but even if there was
3 a chance, you know, LNG would ruin that.
4 We have a lot of birds that come down here. PM01-166
5 We're the biggest birding spot in the nation I feel, I
6 think, is what I've heard and a lot of people do come down
7 here to bird watch and with LNG, all the gases and fumes and
8 things like that would hurt the migratory birds that come
9 here, that people come to see. And it could also end up
10 killing them and, you know, causing further damage to their
11 populations as well. So that is my statement.
12 I'm against LNG being here. I don't think we
13 need it and that's all I have to say.
14 MR. GANGEL: Scott Gangel, S-c-o-t-t,
15 G-a-n-g-e-l. The LNG project -- I'm fully against LNG PM01-167
16 project. It's going to do nothing but pollute our land, our
17 water and our air. We have a very clean environment down
18 here. It's been clean because we don't have any heavy
19 refineries or any type of petrochemical plants.
20 I know there are some other LNG plants in the
21 state of Texas, I moved away from one of them back in 1973.
22 One of my friends -- probably about 15 of my friends that
23 did not move away from that area are all dead from cancer --
24 every one of them, every one of them, dead from cancer.
25 They didn't move away from the LNG plants.

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PM01-166 Potential impact on migratory birds is addressed in section 4.6.1.2 of the EIS.

PM01-167 Thank you for your comment.

1 It's highly toxic, highly polluted, we don't need PM01-168
2 the boat traffic to be stopped in our ship channel out here.
3 We don't need LNG boats going between our jetties back and
4 forth, it's a hazard. It also brings a terrorist hazard to PM01-169
5 our area and we definitely don't need LNG around here at
6 all. And it's going to do nothing but destroy our real PM01-170
7 estate market, destroy our resort area here, and it's
8 totally unwanted. I'm fully against it.
9 MS. MERRILL: I'm Sarah Merrill, S-a-r-a-h, like
10 the stock broker, M-e-r-r-i-l-l. And I have a broken
11 printer so I'm going to do it from my laptop if that's okay.
12 Today is January 9th, 2019, alright, I mean that's the
13 time, maybe to be 69 years old, you know, one day it just
14 becomes like the others. All right. But I know for sure I PM01-171
15 drove here tonight through the area where this LNG project
16 is going in and it's such a beautiful area.
17 I took my family from New York State there when
18 they visited, and they wanted particularly to see it. So,
19 and they spent some money in the area, but many ecotourists
20 will not be able to visit when -- if this project goes in.
21 We're all so sad and so discouraged but very
22 grateful to all of you staff for helping us to at least make
23 our arguments against it. It would be a wonderful thing if
24 FERC could say no for a change for a good reason -- for very
25 good reasons, anyway.

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PM01-168 The potential impact of the LNG vessels that would result from Project construction and operation is addressed in several sections of the EIS, including section 4.9.10.2 and 4.12.3.

PM01-169 The potential threat of terrorism is addressed in the discussion of LNG terminal and marine facilities security in several locations within section 4.12 of the EIS.

PM01-170 The potential impacts on real estate values and tourism, including resorts, is addressed in sections 4.9.3 and 4.9.2.2.

PM01-171 Thank you for your comment. Potential impact on the area's tourism industry is addressed in section 4.9.2.2 of the EIS.

I oppose the LNG project, which is the third of the three remaining projects. The Annova project is the largest and would have the largest impact, especially, as I understand it, on the upland Loma brush habitats. Nor is it far enough away from the SpaceX site to prevent vapor cloud explosions -- VCEs, which will not only be major safety disasters, but economically prohibitive of any future operations. PM01-172

And there really is no effective way, given the fact that SpaceX is within ten miles of preventing VCEs. So my major concern is the VCE danger, which would be a really total disaster, but of course, I'm also concerned about habitat loss. PM01-173 PM01-174

So, I taught logic at universities and one of the things I've noticed about all of the data that's reported and the studies -- the additional studies beyond the Draft Environmental Impact Statement, is that the fallacy of the flashlight was used, and there was not sufficient research to rule out a vapor cloud explosion as a result of perhaps smaller fires than one would see the whole sky blow up as in the Chinese port explosion. PM01-175

The flashlight fallacy is the case of the drunk who was found by the police officer looking under the streetlight for his lost keys to his car and when asked where his car was, he says over there in the dark but it's

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PM01-172 We address potential impacts on loma habitats in several locations in the EIS. See also response to comments IND9-14a and IND15-1.

PM01-173 Section 4.12.5.7 of the EIS includes an evaluation of potential impacts on the Annova Project from external events, including a launch failure at the SpaceX facility.

PM01-174 Habitat loss is addressed in several sections of the EIS, including sections 4.6 and 4.7.

PM01-175 DOT PHMSA's LOD issued on March 20, 2019 evaluated the overpressure or blast wave effects due to an explosion of flammable vapor. Specifically, section 9.5 of the LOD analysis showed the overpressure hazards would remain within the Project's property line and could extend into the Brownsville Ship Channel. In addition, we evaluated whether layers of protection would be in place to reduce the risk of offsite impacts on the public from hazards, including explosions. Based on the proposed layers of protection, FERC staff recommendations, and DOT PHMSA's LOD, we find that the risk of potential impacts from explosions were sufficiently evaluated. With respect to the risk related to the Annova Project's location near the SpaceX facility, see response to comments CO10-73 and CO10-75.

1 dark over there so I'm looking for the keys over here. And PM01-175 Cont'd
2 that's called the flashlight fallacy and logic.
3 So, the studies that purport to show that this is
4 safe -- this LNG project is safe, given the SpaceX presence
5 with the new larger rockets, and the live rocket fuel commit
6 this fallacy because they examine individual buildings on
7 the ground and the risk of explosions from, say, falling
8 parts, but what they don't deal with at all is the pooled
9 methane, that admittedly is hard to measure, but occurs.
10 And we know this has occurred in other places. I
11 come from Cleveland, Ohio, where we have a long history of
12 natural gas accidents as well as the river that burned. So,
13 it's not to be ruled out as a significant and unacceptable
14 environmental risk and safety risk. So it would kill all
15 species, and it would send cars a kilometer away -- that's
16 what happened in the Chinese port explosion.
17 The blast range was 5 kilometers and it sent cars
18 a kilometer, it moved a whole heavy car a kilometer. This
19 is what happens with vapor cloud explosions and I'm sure
20 that the engineers don't want to talk about that because
21 they think -- engineers are great. I taught engineering
22 ethics for years, they will please, and they want to please
23 and solve the problems, but they define the problems more
24 narrowly than these problems are.
25 So, habitat destruction is next after the major PM01-176

PM01-176 Impact on wildlife habitat, including from the proposed access road, is addressed in section 4.6 of the EIS and impact on wetlands is addressed in section 4.4.

1 security VCE risk and that's obvious -- this takes so many PM01-176
2 acres and it destroys a designated number of wetland areas,
3 but additional areas would be impacted by the roads. And, PM01-177
4 of course, the species don't stay put, they try to cross the
5 road. We recently saw so many dead pelicans on Route 48.
6 And it's not just the brown pelican who were
7 saved by extinction by Rachel Carson's movement, but it's
8 the piping plovers, and the aplomado falcon and of course,
9 the ocelot and any possible jaguarundis that are left.
10 So, mitigation is suggested, and I did read the PM01-178
11 mitigation portions, but they clearly consist of merely
12 preserving areas already preserved and flooding a small
13 lake, which two people with a shovel could do, is not
14 adequate mitigation, especially since that's the exact
15 territory that was already protected and under Fish and
16 Wildlife management.
17 So, this DEIS shows disregard of the facts about PM01-179
18 the highly significant harm to vulnerable wetlands and
19 upland Lomas and a false premise that this lake refilling
20 will be an adequate mitigation. In my view, and I've argued
21 this about the others, only a completed and widened wildlife
22 corridor costing probably $100 million, according to the
23 estimates of the conservation fund I consulted with -- only
24 a wildlife corridor widened and greatly completed could help
25 mitigate these massive risks, but it's such a monumental

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PM01-177 Impact on wildlife, including increased risk from crossing of the proposed access road, is addressed in sections 4.6 and 4.7 of the EIS.

PM01-178 See response to comment CO10-68.

PM01-179 With regard to wetland mitigation see response to comment CO10-68. With regard to mitigation for impacts on lomas, including acquisition or preservation of lands for a wildlife corridor, see response to comment CO10-58.

1 task it seems better to build LNG somewhere else, or PM01-180
2 install a bunch of solar arrays and windmills instead for
3 energy.
4 I know that's not what's being examined here, but
5 it's certainly a cost-effective alternative. So 100 million
6 is the conservation fund estimate. Costs of the wildlife PM01-181
7 corridor could be reduced by using our networks of certified
8 Texas master naturalists, of which I and my partner are
9 some, and the Rio reforestation project, where I often took
10 my student groups to replant native trees and shrubs and
11 flowering plants. But even if many thousands of school
12 children are involved, it's still probably not going to be
13 adequate to offset all of the harms, including the very PM01-182
14 small particles and the various air pollutants that would be
15 discharged.
16 I suffer from asthma even though I've always been PM01-183
17 outdoorsy and so do many children and students of mine in
18 universities and this will worsen. These asthma conditions
19 will worsen with the releases from the LNG liquefaction and
20 possibly through the transfer process.
21 It's argued that the heat will be discharged not
22 through the water but through the air and this will come
23 along with a certain number of very small particulates,
24 which are actually more harmful to infants, according to a
25 pediatrician on our Sierra Club Executive Committee -- more

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PM01-180 Section 3 of the EIS evaluates alternatives for the Project, including alternative locations. As stated in section 3.1, wind and solar energy cannot meet the purpose for the Project and are not considered or evaluated further in the EIS.

PM01-181 See response to comments CO10-57 and CO10-58.

PM01-182 See response to comments CO10-57 and CO10-58.

PM01-183 Air emissions are evaluated in section 4.11.1.2 of the EIS. As described in that section of the EIS, primary standards for NAAQS emissions set limits the EPA determined would protect human health including sensitive populations such as children, the elderly, and asthmatics.

1 harmful than larger particles, and so he expects to see lots PM01-183 Cont'd
2 more cases of childhood asthma, which are costly.
3 They're costly to families, they're costly to
4 Medicaid and they're costs to health insurers. So the air
5 pollution, the public health risk is the second kind of
6 public health risk other than security and this air
7 pollution, this public health problem, is really not
8 addressed by the Environmental Impact Statement at all,
9 although humans are one of the species at risk here.
10 So, unsatisfactory mitigation, public safety --
11 another factor is the noise. The noise levels measured by a PM01-184
12 professor of engineering at University of Texas, Bill Berg,
13 the noise from compressors along the way, as well as the
14 main facility, will be prohibitive and significantly
15 negative in its environmental effect.
16 We don't often mention noise because so many of
17 us are nearly deaf. Many of the younger generation always
18 have ear buds that are too loud and they -- you know,
19 they're already deaf, but some of the rest of us, including
20 all the wildlife, would like to keep our hearing. It's an
21 important safety tool.
22 So, the noise is -- I did see some measurements
23 of noise, but it doesn't include, I think, all the
24 compressors that would be required for the pipeline that
25 would service this LNG plant. So you can't just look at the

PM01-184 The proposed Annova LNG Project does not include a pipeline with compressor stations. Noise from construction and operation of the LNG terminal facilities is addressed in section 4.11.2 of the EIS. Cumulative noise from other proposed and potential projects in the region is addressed in section 4.13.3.9 of the EIS.

1 environmental impacts of the LNG facility Annova is PM01-184 Cont'd
2 proposing. We have to look at the wider environmental PM01-185
3 picture which does not abstract Annova from the pipelines
4 and all of the secondary infrastructure that's required.
5 My last concern is economic -- socioeconomic PM01-186
6 really. LNG is an obsolete fuel and I would criticize even
7 Nancy Pelosi, who used to say several years ago that, "Oh,
8 natural gas is so much better than fossil fuels, it has 50%
9 less CO2 released." But, of course, it is a fossil fuel and
10 the CO2 is released in this whole lifecycle through the very
11 high carbon footprint of fracking that supplies this natural
12 gas -- feed gas.
13 And so, you can't just say well, LNG burns
14 cleaner. It's the formation of it, it's the constitution of
15 it, it's the transport of it that raises the carbon
16 footprint to way more than one tallies when one looks at the
17 carbon footprint of LNG.
18 At first, I thought, oh, this is good, this is a PM01-187
19 transitional fuel, and we have to allow this for a few years
20 until we have more solar and wind, but every time I drive
21 along Route 77 and see the beautiful windmills growing and
22 growing and talk to my farmer friends who have big farms and
23 get much more income from Duke Energy and the windmill
24 people than from the oil people.
25 So, we really need to replace, I think, the LNG

PM01-185 See response to previous comment PM1-184.

PM01-186 See response to comment CO7-3.

PM01-187 As stated in section 3.1, wind and solar energy cannot meet the purpose for the Project and are not considered or evaluated further in the EIS.

with renewables now or yesterday. You know, when we had the BP oil spill in the Gulf, I was driving to a convention up north along the Lady Bird Johnson Wildflower Highways and what was -- I was just almost in tears hearing about the horrible oil pollution of the oil spill -- BP oil spill.

But coming the other way on 77, down to the valley where huge trucks with huge windmill blades going the other way and I thought that's so encouraging. And that's our hope, but LNG is no longer a source of hope. It is obsolete and it's not economically feasible. PM01-188

The trade war with China, which is, yes, being negotiated to some extent, but it already is having negative effects and it will make -- the suppliers will presumably get "higher prices," but that's assuming they can sell their product. And as far as we know, China and Russia and other countries like Germany, have other sources of LNG now, so I think it's obsolete and to build it would take a few years to get this built and by then it may not be at all feasible economically. PM01-189

And so, I worry that a lot of investors, including a lot of us with our stock portfolios, are going to lose a great deal of money, then we'll be left with this hulking nine-story tall city-block-wide, and many and hundreds of acres of destruction, which will really destabilize our coastline and it won't hold the water during PM01-190

PM01-188 See response to previous comment PM1-187.

PM01-189 Project cost, or risks to Project investors, is beyond the scope of the EIS. See also response to comment CO6-20.

PM01-190 See response to following comment PM1-191.

1 hurricane surges -- water surges and so we need to consider PM01-190 Cont'd
2 that.
3 The applicants to FERC for LNG projects must, but PM01-191
4 have not, described the design storm surge elevations for
5 the project site. And their basis for both -- and this is
6 back to, you know, the overriding concerns of factors not
7 included in the scope of the Draft Environmental Impact
8 Statement.
9 They're charged with describing the design storm
10 surge elevations for the project site, and when I talked to
11 engineers in the early years of the planning of this, they
12 told me -- I asked them about elevation because I have
13 assembled an international case book of construction ethics
14 -- disasters and case studies that involve ethical lapses in
15 decisions by unethical developers, you know, where the
16 contractor -- construction contractor is in the middle
17 position, what I call the middle position.
18 And they try to negotiate solutions to solve the
19 problems, but the assumptions that we have to make for
20 safety are not always valid. We have all kinds of cases of
21 states lying about the soil, moisture content of soils and
22 faking drill samples and so on. And the storm surge
23 elevation is a really crucial issue.
24 So, they told me they'd be elevating six feet.
25 And at the time we hadn't had hurricanes Harvey, Irma, what

PM01-191 The proposed site elevations and facilities are designed to protect critical facilities from storm surges, including from hurricanes. However, we have included a number of recommendations related to storm surge elevations to ensure that the final design accounts for the maximum potential storm surge elevation. See additional discussion in section 4.12.5.6, and our recommendations in section 4.12.6. In addition, see response to comments IND09-9 and IND09-13.

PM01-191

1 was the last one -- Maria, and Florence and on those,
2 especially with the Texas impact of Harvey, we saw storm
3 surges that were way higher than the elevation that is shown
4 in this project, so I challenge the engineers to take
5 another look at that.
6 The 100- and 500-, 1,000- and 10,000-year return
7 elevations in the NOAA storm surge elevation data for
8 hurricane-prone areas, include the effects of sea level rise
9 and regional subsidence. Considering the design line for
10 the facilities for time-dependent, severe and natural
11 hazards -- and those are Sections 13.1.3.1 one and two,
12 three through four, which the 100-year return period.
13 But note that that data in those categories were
14 compiled before Hurricanes Harvey, Irma, Maria and Florence
15 and since the global data on storms within the past decade,
16 includes a much higher probability of 500-year storms, we
17 have to think that, for instance, we could experience more
18 500-year storms in the next 10 years or 5 years.
19 We have experience 26 500-year storms in the past
20 10 years. When you look at that data you begin to see that
21 this building on the shore here is not feasible, and, you
22 know, I don't think we should all paying higher insurance
23 and the public should have to pay for the ruin that will
24 exist even if it's elevated 12 feet or 24 feet.
25 26 500-year storms in the last 10 years -- 26

1 500-year -- and the insurance industry is certainly aware PM01-191 Cont'd
2 of this. And I'm concerned that the project won't get
3 performance bonds given this risk. The insurance industry
4 has long been aware of climate change. And, of course, a
5 final note, climate change is occurring and failure to
6 include the latest data on 500-year return periods and storm
7 surges, you know, were almost 40 feet in some places in
8 Hurricane Harvey and that's not even territory quite as
9 coastal wetland and so on as our site here, sacred land of
10 the Native Americans.
11 So, the DEIS is unsatisfactory, it doesn't PM01-192
12 mitigate the noise levels, incomplete wildlife corridor
13 mitigation planning and threats to the Native American
14 sacred lands. Wetlands and Lomas are highly fragile zones PM01-193
15 -- not evenly distributed around the country. Ours are
16 unique, highly valued, economically important with $340
17 million a year in ecotourism in this region, and these
18 wetlands are necessary for cleaning up the waters and the
19 air that's crucial to the lives of humans and other species.
20 This is why the Bahia Grande was restored,
21 finished in 2003 at great cost. It was the largest wildlife
22 restoration project in the northern hemisphere. And now we
23 are following it with these LNG facilities. So the only
24 solution -- a mega mitigation wildlife corridor and why not
25 invest in Annova windmills and Annova solar arrays. I'll

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PM01-192 We disagree that the draft EIS was inadequate. See responses to the preceding specific comments on noise, wildlife corridor, and threats to Native American lands.

PM01-193 Project impacts on wetlands is addressed in section 4.4 of the EIS, and impact on lomas and the value of lomas as wildlife habitat is addressed in several sections including 4.5, 4.6, and 4.7. Potential impacts on the Bahia Grande is addressed in sections 4.3 and 4.4.

1 come out and help you build those, I'll come out and enjoy
2 them, I think they're beautiful. Thanks for listening, that
3 concludes my comments on the Annova LNG proposal. Please
4 deny the permit.
5 MS. STEINBERG: Okay, my name is Laurel Steinberg
6 and it is spelled L-a-u-r-e-l, S-t-e-i-n-b-e-r-g. Okay, I PM01-194
7 think that the Port of Brownsville is not an appropriate
8 location for an LNG facility, no matter how well planned out
9 it is. The area between the port shrimp basin and the Port
10 Isabel is now undeveloped and is the habitat of many
11 endangered rare and beautiful animals and plants, even
12 though it is zoned industrial, does not make it
13 appropriate.
14 It is one of the few undeveloped areas near a
15 population center on the Texas coast and thus a major
16 tourist and ecotourism attraction -- fishing, bird watching,
17 kayaking, biking are popular and draw many visitors all year
18 long.
19 Development of industry will create ugly PM01-195
20 structures and pollution while destroying habitat. The DEIS
21 itself claims that visual impacts will be moderate. Annova
22 will destroy three Lomas, which have a rare ecosystem, PM01-196
23 impossible to replace. They have not proposed any
24 mitigation for the vegetation of the Lomas, which takes
25 thousands of years to develop.

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PM01-194 Thank you for your comments. See section 3 of the EIS for our assessment of alternatives, including potential alternative locations for the proposed Annova LNG Project.

PM01-195 Thank you for your comment.

PM01-196 See response to comment IND9-14a.

The mitigation for the wetlands they're taking to reflood the San Martine Lake is not adequate and will not -- will violate the No Net Loss Policy. The DEIS says the dredging may do permanent and significant damage to water quality of South Bay, which could ruin sea grasses and oyster beds. PM01-197 PM01-198

The DEIS states that the channel mudflats and terminal site are essential fish habitat, yet there is no study to explain what those resources are at the project site. They're using data from a Louisiana project. PM01-199

Also, Annova will be on a site that is part of the Bahia Grande Coastal Corridor Project which is planned to allow wildlife to run far and wide. Annova blocks this migration corridor. The lights and noise from Annova also will adversely affect the adjacent parts of the wildlife corridor. PM01-200

Also, the need for the project has not been demonstrated as there are yet no contracts for buying the LNG. If built, Annova would be one of the largest single sources of pollution in the Rio Grande Valley. And it would be a shame to pollute this clean air area. And that's all I have to say. PM01-201 PM01-202

MS. BOWARD: Karen, K-a-r-e-n, Boward, B-o-w-a-r-d. Well, you know my name. I've lived in the Rio Grande Valley for 42 years now and I was a teacher and a

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PM01-197 See response to comment CO10-68.

PM01-198 The draft EIS does not say that dredging would do permanent and significant damage to water quality of South Bay. See section 4.3.2 of the EIS.

PM01-199 Our assessment of Essential Fish Habitat at the Project site and the potential impact on EFH was included in appendix D of the draft EIS. See also response to comment CO10-34.

PM01-200 See response to comment CO10-57.

PM01-201 See response to comment CO6-20.

PM01-202 Thank you for your comment. See our assessment of air emissions from the proposed Annova Project in section 4.11.1 of the EIS.

1 school librarian. I raised -- my husband and I raised two
2 boys here and of course we love the area, we love South
3 Padre Island for vacations. So we're really horrified that PM01-203
4 LNG might become a possibility, especially Annova, which is
5 such a huge one, and I'm really concerned about the
6 endangered species that could be possibly wiped out,
7 especially the -- now I've completely lost it, the ocelots
8 and all the birding opportunities that are here at South
9 Padre Island. I've enjoyed that over the years that we've
10 been here.
11 But I want to continue criticizing the Draft PM01-204
12 Environmental Impact Statement for Annova. The Draft
13 Environmental Impact Statement is incomplete. There's a
14 long list of important information that FERC is requesting
15 from Annova before the end of the comment period.
16 How is the public supposed to comment on
17 information that isn't there? How will the public know the
18 required information is submitted and how will they be able
19 to comment on it?
20 So, the public comment deadline should be PM01-205
21 extended. The Mitigation Plan is grossly inadequate. PM01-206
22 There's no Mitigation Plan whatsoever for the three Lomas,
23 409 acres that will be mostly cleared, graded and built
24 upon. Lomas are unique geologic and biologic formations of
25 immense habitat and wildlife value.

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PM01-203 See our assessment of potential impacts on endangered species, including the ocelot, in section 4.7 of the EIS. Potential impact on birding opportunities is evaluated in several sections of the EIS, including 4.8, 4.9, and 4.11.2.

PM01-204 See response to comment IND14-6.

PM01-205 On February 7, 2019 FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

PM01-206 See response to comment IND9-14a.

Annova's Draft Environment Statement repeatedly dismisses or minimizes their immense value and offers no mitigation. From a biological perspective this is criminal. PM01-206 Cont'd

For the wetlands that will be destroyed, 53 acres, Annova proposes to reflood Little San Martine Lake by opening up an abandoned earthen levee, something that could be done by two people with a shovel. PM01-207

Also, this area is already under the protection of U.S. Fish and Wildlife Service. That is not meaningful mitigation as it in no way can measure with the wetland impacts Annova will cause. The Wetlands and Mitigation Plan, as proposed, will violate the No Net Loss federal policy.

Annova's vegetation survey on the project site is inadequate. It states there are no species present from the annotated county list of rare species from Texas Parks and Wildlife, which is not true. Also false is the statement that the Ebony Snake Eyes Vegetation Community does not exist on the site. PM01-208

In return for agreeing to move the project site slightly eastward, the FWS agreed to surrender over 100 acres of Loma Ecological Preserve land. This formerly protected habitat needs to be mitigated. PM01-209

The exact location of the proposed staging and parking areas needs to be included, including the type of PM01-210

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PM01-207 See response to comment CO10-68.

PM01-208 See response to comment CO6-5.

PM01-209 See response to comment PM1-27.

PM01-210 In response to our recommendation in the draft EIS, on March 20, 2019, Annova filed information on three potential locations for the off-site parking, stating that because it is in the process of negotiations with the property owners it cannot disclose the exact locations. However, in general Annova states the areas are currently disturbed or in similar use as a parking area. See updated section 4.9.10.1 of the final EIS.

1 habitat effected. If they will be in natural areas, the PM01-210 Cont'd
2 likelihood of their returning to their original state after
3 several years of heavy construction is almost nonexistent.
4 Mitigation should be required.
5 Regarding migratory as well as nesting bird PM01-211
6 impacts, the Environmental Statement says, "Annova would
7 attempt to limit clearing on the project site to between
8 September 1st through February 28th to avoid impacts."
9 "Would attempt" is very weak and unenforceable language and
10 should be changed to "is required."
11 A total of 18 species that are federally listed PM01-212
12 as threatened, endangered or proposed will be potentially
13 affected by the project. The Draft Environmental Impact
14 Statement states Annova will likely adversely affect the
15 endangered ocelot and jaguarundi. Many other rare and
16 important species will be impacted as well.
17 Section 7 of the Endangered Species Act as
18 amended states that any project, authorized, funded or
19 conducted by any federal agencies should not jeopardize the
20 continued existence of any endangered species or threatened
21 species, or result in the destruction or adverse
22 modification of habitat in such species which is determined
23 to be critical.
24 I think that's enough. I'm going to -- okay, PM01-213
25 let's see, noise and light impacts will result in an

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PM01-211 See response to comment CO6-11.

PM01-212 See response to comment CO4-8.

PM01-213 See response to comment CO6-12.

environment that wildlife, particularly migratory birds and nocturnal species such as ocelots -- the endangered ocelot, will avoid at their wildlife corridor, and 437 acres within the Laguna Atascosa National Wildlife Refuge. PM01-213

The western portion of Loma Potrero that Annova proposes to leave as a corridor will be heavily impacted by noise, lights, traffic and a 20-feet-wide security road outside the primary security fence. Its ability to function as a true wildlife corridor, particularly for ocelots, is highly doubtful.

The need for this project has not been demonstrated. There are no buyers for the LNG, no binding contracts for a project with so many negative impacts. An unequivocal need for the project has not been shown. PM01-214

The socioeconomic analysis in the Draft Environmental Impact Statement is narrow in view and incomplete. It does not include the cost for security, safety and emergency response that will include our local police, fire, and medical services. PM01-215

These costs will be covered through a cost-sharing plan and will include, but not limited to, training, emergency management, security, emergency equipment, patrol boats, firefighting equipment, overtime for police and fire personnel and LNG marine carrier security.

PM01-214 See response to comment CO6-20.

PM01-215 See response to comment IND15-13.

I'm going to get off of this script for a moment and tell you how horrified I am of changing this area with these huge plants. I -- we go to the beach a lot and one of the things I like the most about it is the jetties. The jetties -- that very narrow channel that goes out to the Gulf. PM01-216

It really concerns me, all the wildlife that's there, the turtles, the fisherman, the birds, and these huge tankers just absolutely terrify me, that would be going through there past those fishermen who are just hanging out there and trying to catch some fish for dinner. PM01-217

It just terrifies me, and I don't want to have to be there. I mean I love going on those jetties, but I would never go there if a huge tanker was going by that seemed so threatening to me -- it would seem very threatening to me.

If Annova is built, it would be one of the largest single stationary sources of nitrogen oxides, carbon monoxide, VOCs, sulfur dioxide, particulate matter and greenhouse gases in the Rio Grande Valley. PM01-218

To dismiss the proposed emissions because of standards would not be exceeded, nor is it unacceptable reality that air quality would be permanently worsened. The higher the air pollutants levels, the more adverse health effects there are, especially to vulnerable populations. The project will worsen those levels.

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PM01-216 Thank you for your comment.

PM01-217 Thank you for your comment.

PM01-218 See response to comment PM1-2.

The Annova site is one-fourth mile from the Rio Grande LNG site, which is within the zone 1 thermal hazard zone -- potentially most severe. LNG terminals should not be placed in so close proximity to prevent the possibility of a catastrophic -- catastrophe at one spreading to the other. PM01-219

The SpaceX launch site of Boca Chica, six miles away from the proposed Annova terminal site -- where is the launch failure analysis? Did that analysis include SpaceX BFR, which will be larger than any existing rocket and has a larger debris field, which SpaceX says it intends to launch from the Boca Chica site?

That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. PM01-220 The Draft Environmental Impact Survey -- cumulative impacts have the potential to be more substantial for water resources, protected wildlife, visual resources, noise and transportation. PM01-221

It further states, "We have determined that cumulative impacts on ocelots and jaguarundis would be permanent and significant." These are more than sufficient reasons to deny this permit.

I think I pretty much -- it's obvious how strongly I feel against this project and I think it's

PM01-219 With respect to the location of the Annova LNG Project relative to the other projects, see response to comment IND15-5. With respect to SpaceX, see response to comments CO10-73 and CO10-75.

PM01-220 See response to comments CO10-73 and CO10-75.

PM01-221 The determination of cumulative impacts for ocelot and jaguarundi is not justification for denying approval of the Project. See also response to comment CO6-8.

totally the wrong thing to do to this area.

MS. WORRELL: Okay. My name is Maile and it's M-a-i-l-e, and the last name is Worrell, W-o-r-r-e-l-l. Is that it? Okay, and what I'm doing here is telling you guys what I want you to consider; right? And some of it's from this and some of it's me.

And if this is built it would be the largest single stationary source -- I'm reading this off of here, you've heard it a million times, of nitrogen oxides, carbon monoxides, VOCs, sulphur dioxide, particle matter and greenhouse gases in the RGV. PM01-222

The reality is that the air quality would be permanently worsened. The direction of the wind blows it over schools in the communities. The higher air pollutant levels, the more adverse health effects, especially to children, older people, vulnerable people. And then this talks about April and May, but we won't go there.

The impacts -- the negative effects of this gas is inflammation of the airways, the long-term exposure decreases lung function, increases allergy response and it affects children and adults. Then there's also the green gases and how it affects the plants -- not the green grasses, I got distracted, see back to the shiny object, how it affects -- it reacts with sunlight and forms ozone damage with the vegetation -- something about the vegetation.

PM01-222 See response to comment PM1-2.

And we have a lot of sunlight here, so I could also add that this community is striving for ecotourism. Our town is a big selling point, they're building places -- I'm trying to read the sign in my mind, in Laguna Vista off the 100 they're going to put a building and everything to attract ecotourism. PM01-223

If they can't breathe, that may be a problem. It's going to take away from -- not to mention fishing and ocelots and I'm sure you get plenty of those, but I really wanted to hit on the air quality for this one. Done.

MR. HOLLMANN: My name is Larry Hollmann, L-a-r-r-y, Hollmann is H-o-l-l-m-a-n-n. Okay, first off, I'd like to talk about the wildlife and habitat. I grew up on a farm and so I have probably a little bit better understanding of what happens to animals and wildlife and habitat when you start changing it.

I think the study already admits that the ocelot and jaguarundi are going to be affected but there are other things also that you need to take into consideration. For instance, we, for the last couple of groups of years have seen that the turtles are beginning to come back in our bay, and I've seen more turtles in about the last three years or four years really, than I've ever seen before. PM01-224

And I think turtles, like a lot of animals, like a lot of fish go by instinct and so if you make big plants

PM01-223 See response to comment PM1-2.

PM01-224 Potential impacts on sea turtles are evaluated in section 4.7.1.4 of the EIS.

1 that put a lot of air pollution up to change the temperature PM01-224 Cont'd
2 of the water, are not going to be able to follow the things
3 that have brought them to our bays for years where they lay
4 their eggs, how they find their way back because
5 everything's going to change.
6 With three plants especially, there's going to be PM01-225
7 a lot of heavy pollution put into the air and into our bays.
8 The Mitigation Plans that I've seen don't really talk about
9 what they're going to do for the bays or what they're going
10 to do for the air.
11 My in-laws live in a little town called
12 Fayetteville, which is outside of Austin where Austin has
13 built an electrical plant to generate electricity for
14 Austin. It is like there is a high- pressure area over
15 Fayetteville. It's like the clouds come to drop the rain
16 but then they part, almost literally part, in that area.
17 They go around Fayetteville. It's become drier and drier
18 and drier.
19 I grew up next to Interstate 10 or I was there
20 before Interstate 10 came and I grew up in a place called
21 Columbus, Texas, or on a farm outside of Columbus and I can
22 tell you that the people of that area suffer a lot more from
23 health issues, sinus, all three -- I have two brothers, all
24 three of us have problems with the sinus and not that many
25 people had problems when we were younger.

PM01-225 Cumulative impacts, including from construction and operation of the 3 proposed LNG projects, are addressed in section 4.13 of the EIS. Annova is not proposing mitigation plans specific to air quality or water quality.

The Interstate 10 came in when I was probably about 10 years old. Light pollution -- most of the cats in the valley are nocturnal animals. A lot of animals are nocturnal. We're all on the edge of the Tamaulipan desert. Many of the animals, the different rodents, the different types of wildlife come out and live at night because of the heat and the drought here and with all the light pollution from three plants, there's just going to be a complete change and I don't think that a lot of the wildlife that we have are going to be able to handle that, especially the ones that depend on stealth to be able for their livelihood. PM01-226

There's no amount, so far as socioeconomic and cultural resources that Port Isabel and the Island are going to be definitely affected. The towers are going to be 14 stories tall, probably going to have flashing lights in order to warn and keep airplanes away. PM01-227

Visitors to the Island and visitors who are bird watchers aren't going to want to come to a place that there are no more birds left -- it's unsightly, the smells. So far as air and noise and visual pollution, the winds that come off of this area will blow the pollution directly towards the Port Isabel High School and towards the Island.

I don't know if anybody realizes the long-term affects on people who live close to pollution. I know that having grown up on Interstate 10, I do know and do still

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PM01-226 The potential impacts from light on wildlife is addressed in section 4.6 and 4.7 of the EIS.

PM01-227 Annova is not proposing to install any structures over 200 feet in height that would require any aircraft warning lights. With respect to potential impact on bird watchers and other visitors, see EIS sections 4.8.4 and 4.9.2.2. With respect to air emissions and potential impact on Port Isabel High School and South Padre Island, see response to comment PM1-183.

feel the affects when I go there of being that close to the highway. Our land actually borders Interstate 10.

The atmosphere around there has changed. It used to be somewhat clear. Now, most of the time you sort of have an -- especially in the evening, an orange glow as the sun goes down and not a clear glow either, you can see the haze.

Safety and risk analysis -- we're right here next to Mexico. Shrimp boats come and go all the time. Boats from Mexico come and go all the time. People walk across the river. I am really concerned about the safety issues. If for some reason a person wanted to sabotage one of the plants, I think it would be very easy to do. PM01-228

The shrimp boats can probably just almost drive or sail right up to one of the bigger boats or one of the plants. Cumulative impacts -- we do live on the edge of a desert. We, for the last umpteen years have always said -- the old timers have always said that there are 10 year's worth of wet weather and then are more rain than 10 years of drought. PM01-229

And to be honest, in about the last 25 to 30 years we've only had a few years of decent rain. Our climate is changing. Our area, because it is on the edge of a desert, is very sensitive. It doesn't take much to change it. We have some unique -- we have some very unique things

PM01-228 Security of the LNG terminal and LNG carriers while in transit is addressed in several locations within section 4.12 of the EIS. See also response to comments IND12-1 and IND21-5.

PM01-229 Thank you for your comment.

here.

We're on the flight ways of many birds that come across this area. We have a river delta. We have a beautiful spot during the wintertime for the whooping cranes. We have a wonderful bay that I love to fish in during the winter, summer, all this is going to change and it's not going to change overnight. PM01-230

It's going to take years, but just as Interstate 10 has affected the area that I grew up in, and the power plant from Austin has affected the area next to Columbus, those areas have changed. I've seen it. What are the real long-term effects going to be to the citizens of the valley, to the health of the valley? What are we doing so that a group of people outside the valley can make money -- and that's literally what's going to happen because the groups that are setting these projects up, are looking to sell them, they're not going to keep them. Thank you for your time. PM01-231

MR. RAMIREZ: Jose Angel Ramirez. R-a-m-i-r-e-z. Yes, well, I'm against LNG because you know, that's where they're going to build it, you know. That Bahia Grande has always been there and once upon a time they closed it and it dried up, but now that they opened it because it's always been a nursery for fish and shrimp; right? PM01-232

And now that they opened it up, all the fish

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PM01-230 Thank you for your comment.

PM01-231 The analysis in the EIS includes assessment of potential short and long-term impacts in the environment and people.

PM01-232 Potential impacts on the Bahia Grande from Project construction and operation, including sedimentation, is addressed in section 4.3.2.2 of the EIS. As stated in section 2.9 of the EIS, Annova anticipates at least a 25-year life span for the Project, but the facilities would be designed and capable of operating for 50 years or more with proper maintenance. An environmental review would be required if Annova would propose to abandon the Project.

1 found its way back up there and they spawn it, not only -- PM01-232
2 even chinook they're catching there and it's a wetland for
3 the birds too, you know? And I've lived here all my life.
4 I was born and raised here, so something like that, we're
5 not used to something like that, you know.
6 And I'm scared the day they pick up and go, pick
7 the bag and go, you know, they're going to leave pollution,
8 who's going to clean that, you know, taxpayers? You know,
9 so to me it's not right where they're going to build it you
10 know, and I don't know why they didn't build it over there
11 in Brownsville, you know -- get it away from us, you know.
12 This is a resort area here, that's just my
13 comment. Well, no, just, you know, I can't see something
14 like that being here you know, because, you know, my
15 grandparents were pioneers of Port Isabel, you know. Even
16 that going to Brownsville, the train used to cross the
17 Bahia, you used to have a railroad across there so, you
18 know, something that I think is going to be destroyed, you
19 know, I can't understand it, you know.
20 So, you know, do it for my family right that
21 still live here. So that's about it.
22 MS. RAMIREZ: Okay. My name is Anita Ramirez,
23 A-n-i-t-a, R-a-m-i-r-e-z, okay. I was born and raised here
24 in Port Isabel. We have a beautiful little town and I heard PM01-233
25 about, you know, what LNG does to other places and I'm not

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PM01-233 Thank you for your comment.

for it.

You know they say it's going to bring money inside that you know, I own a business. They say it's going to bring more business to our place, but to me I think what is more important -- our health or money? You know, like I mean really, what's the use of having money coming in and we're going to be sick, we're not going to be able to work and, of course, the young kids will take over, but they'll be getting sick too.

PM01-233 Cont'd

So, what's more important, our health or the money? And I do not agree that what's coming in. So we need help because like I said our health is more important. Money comes and goes, but not our health. So that's how I feel that, you know, I don't want LNG.

So, I'm going to try to get some more votes and see what we can do because I know a lot of people from Port Isabel, but you have to push them. I know, you know, everybody that goes there to my business they say oh, we're not for it, and we're not for it, but they don't come and talk and that's what we need so I'm going to take house by house and tell them what's going on.

And even if they just make their comments in this form, to get to them. That's all. I do hair, hair salon, yes and even my boss is not for it. I thought he was going to be here. Well, I rent a station. He's the owner, but we

have three -- we have a massage therapist, my boss, he does hair, another hair stylist and then me, so you know, we rent the station, but each one of us, you know, it's our business.

So I'm going to take this paper and whoever is not for it, you know, because I mean I was surprised that a lot of them that being this is the second meeting I come to you know, and I've been talking to them and everybody says, no, we don't want to look -- I lived in this place, and they had it and you're not going to like it, that's why we moved away from there.

And they say if you see Houston Park, you will see that it's no good. So, that's what I have to say. You're very welcome. Bye.

MR. CHAPMAN: Jim Chapman, C-h-a-p-m-a-n. So, my name is Jim Chapman. I live in Weslaco, Texas in the Rio Grande Valley. And first of all, I want to go on record as opposing the Annova LNG Project. I read through the Draft Environmental Impact Statement and it has quite a few significant errors. PM01-234

In random order one problem is the Annova Project is going to destroy most of three Lomas and Lomas are clay -- vegetated clay hills, extremely valuable biologically. The EIS minimizes their value throughout the 456-page document.

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PM01-234 The potential impact on lomas is acknowledged in several sections of the EIS, including sections 4.5, 4.6, and 4.7. See also response to comment IND9-14a.

Any biologist will tell you -- any biologist that's not being paid by Annova, will tell you how essentially irreplaceable they are. There's only about 15 Lomas. When you take out three, that's a very significant impact. That's a big shortcoming in the EIS. PM01-234 Cont'd

Another factual error that I think is significant in the EIS, the Bahia Grande Coastal Corridor, which is a project that's been going on for some years to try and connect habitat from the ranch country -- the King Ranch and those ranches to the north through Laguna Atascosa National Wildlife Refuge, down to the Bahia Grande restoration across the Ship Channel to the Loma Ecological Preserve and the Boca Chica unit of the Lower Rio Grande Valley Wildlife Refuge and then the Rio Grande and then 1.3 million acres of protected Mexican habitat on the south side of the river. PM01-235

The Draft EIS states that the -- all the corridor area is to the north of Annova, that is false. And, the Bahia Grande Coastal Corridor document on page 13, there's a map and it includes the land south of the ship channel and it includes the Annova site in entirety.

So those are a couple of things that FERC needs to go back and take a closer look at. And I will put more comments into the record before the February 4th deadline. Did you hear all that? Got it? Okay, thank you.

MR. FRY: Okay, my name is Jason Fry, J-a-s-o-n,

PM01-235 See response to comment CO10-57. The referenced statement from the draft EIS regarding lands identified for acquisition matches the features shown as "USFWS Refuge Acquisition Boundary" on the November 2014 Bahia Grande Coastal Corridor Project map. Section 4.8.4.2 of the final EIS has been revised to clarify this statement.

F-r-y. Okay, so I'm here to voice my opposition to the LNG PM01-236
facilities down here. I believe that if built they will
fundamentally change our environment and fundamentally
change the way that we live our lives down here. It will
also affect not only our air quality and, you know, our PM01-237
biodiversity with -- we have one of the most biodiverse
areas as far as birds and things like that, but you know,
just in a nuts-and-bolts sort of thing I'm worried about PM01-238
property values because we own condominiums on South Padre
Island and that's how my mother makes her money, she has
been doing this for about 30 years.

And so, if these come in and people quit
vacationing here then she's going to lose her investment, so
that's brass tacks, that's A number one. You know, growing
up down here I used to live in Dallas, and I lived in Dallas PM01-239
for 20 years, and we had a lot of air pollution. I couldn't
go out and exercise, ride my bikes on certain days because
the air quality was so bad. I came down here, most of the
time it's pretty good so I didn't feel the effects in my
respiratory system, but I fear that if these companies come
down with the pollutants that they're going to be putting
out that it's, not only for myself, it's going to be bad for
the air quality for the children and the elderly, and things
of that nature.

I'm worried about the quality of our water down PM01-240

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PM01-236 Thank you for your comment.

PM01-237 Air emissions and air quality are evaluated in section 4.11.1.2 of the EIS. Potential impact on wildlife, including migratory birds, is evaluated in sections 4.6 and 4.7 of the EIS.

PM01-238 Potential impact on property values is addressed in section 4.9.3 of the EIS. See also response to comment CO10-20.

PM01-239 Air emissions are evaluated in section 4.11.1.2 of the EIS. As described in that section of the EIS, primary standards for NAAQS emissions set limits the EPA determined would protect human health including sensitive populations such as children, the elderly, and asthmatics.

PM01-240 Potential impact on water quality, and measures that would be taken to minimize water pollution, is addressed in section 4.3.2 of the EIS. Potential Project-related impact on tourism and water-based recreation is addressed in sections 4.8.4 and 4.9.2.2.

1 here. I'm worried about the people that you know, that PM01-240 Cont'd
2 choose to you know, come down here for recreation. I'm
3 concerned that if the water gets that oily sheen that they
4 have in different -- you know, this is the last -- and
5 that's the other big thing, is this is the last area that is
6 not -- it's pretty pristine as far as the coast goes of
7 Texas.
8 And so if -- and that's why people come here they
9 say because the water is blue and, you know, it's not
10 polluted. And so I don't see the logic in coming to the
11 last place that is not polluted and polluting it with a
12 finite industry, an industry that is only projected to last,
13 you know, 20 years, because -- so you have that.
14 The other thing that I'm worried about is that PM01-241
15 they do go back and develop these lands and these companies
16 come in and they're like LLCs that once the profitability of
17 these companies, once that's over with, they're just going
18 to walk away. And they're going to leave, you know, their
19 sites and pollution and everything.
20 So, I don't see this as a good thing for the
21 valley. I'm also concerned about SpaceX being so close in PM01-242
22 proximity. You have, you know, the Valley Crossing
23 Pipeline, two 42- or 47-inch pipelines and they're the
24 highest PSI in the lower 58 states, so you have that.
25 And then you have SpaceX and they're going to be, PM01-243

PM01 continued, page 104 of 110

PM01-241 As stated in section 2.9 of the EIS, Annova anticipates at least a 25-year life span for the Project, but the facilities would be designed and capable of operating for 50 years or more with proper maintenance. An environmental review would be required if Annova would propose to abandon the Project.

PM01-242 See response to comments CO10-73 and CO10-75.

PM01-243 See response to comments CO10-73 and CO10-75.

-- you know, nobody knows what they're -- what impact PM01-243
they're going to have. And then if you just put LNG
refineries on top of that, I don't see this area being
desirable anymore. And so -- and I want to continue to live
here and my family wants to continue to live here so I am
voicing my concern because once again it will fundamentally
change the way that we live and, you know, the -- I guess
the profitability. We're not going to be able to live here
anymore, we're not going to be able to make money and it's
going to -- and that scares the death out of me. So,
anyway, that's my comment. Thank you very much.

MS. HINOJOSA: R-e-b-e-k-a-h, and then my last
name is H-i-n-o-j-o-s-a. Okay, I live in Brownsville,
Texas. I'm from the Rio Grande Valley, a region of South
Texas, which is this region, and I am opposed to the Annova PM01-244
LNG Project. I am opposed to the permitting and the
construction of the Annova LNG Project in this region or
anywhere on the planet or anywhere in the country.

And I am opposed to it because there is
tremendous local opposition -- the City of South Padre
Island, Port Isabel, Laguna Vista, and the communities of
Long Island Village have all passed anti-LNG resolutions.
And they are the communities that would be immediately
impacted by any LNG construction because it is proposed to
be built within three to four miles of these communities.

PM01-244 Thank you for your comment.

1 So, I am in agreement with these communities, I
2 support these communities and their opposition to the Annova
3 LNG export terminal and the other two proposed LNG export
4 terminals. I'm also deeply concerned about the impact PM01-245
5 Annova LNG will have on climate change and how the
6 greenhouse gases emitted will contribute to climate change.
7 We are on the front lines of climate change
8 because we live next to the ocean. We're susceptible to sea
9 level rise and harsher storms and, you know, I am opposed to
10 LNG because of the impacts that we face from climate change
11 and how Annova LNG would play a large role in releasing more
12 greenhouse gases that would exacerbate climate change.
13 I'm also deeply concerned with the proposed site PM01-246
14 of the terminals because it is in the pathway of hurricanes
15 and the safety impacts from a hurricane next to, going
16 through a LNG terminal, and I know that the Sabine LNG
17 export terminal and Sabine Pass, that's operated by --
18 what's it called, that company?
19 Yeah, the Sabine LNG export terminal during
20 Hurricane Harvey was leaking and that could have been
21 catastrophic to the nearby communities, so I'm deeply
22 concerned about these LNG terminals in the pathway of
23 hurricanes and I'm also opposed to the Valley Crossing PM01-247
24 Pipeline.
25 Annova LNG plants tap into the Valley Crossing

PM01 continued, page 106 of 110

PM01-245 GHGs and climate change are addressed in sections 4.11.1 and 4.13.3.9. Section 4.13.3.9 of the final EIS has been updated since issuance of the draft EIS.

PM01-246 Section 4.12.5.6 of the EIS describes the design measures that are proposed for the Annova Project to withstand hurricanes. We are also recommending additional measures to ensure the integrity of the facility in the event of a hurricane. See section 4.12.6.

PM01-247 Environmental impacts from the Valley Crossing Pipeline are included in our cumulative impacts assessment in section 4.13 of the EIS. Other matters related to the border crossing component of the Valley Crossing Pipeline would be addressed in the separate FERC docket number CP17-19-000.

Pipeline and I know there is opposition to the southern leg of this pipeline in Mexico and that is one of the reasons why I'm opposed to the pipeline and the plants it happened to. Yeah, I think that's it. And thank you. PM01-247 Cont'd

MR. SAXON: Kenneth Saxon, K-e-n-n-e-t-h, S-a-x-o-n. The first part of my comment is that I would like to see that the process is respectful in representing the desires of the people here locally. I feel like in these situations that the industrial -- the developers are able to set some of the terms of what is -- they want to develop. PM01-248 Cont'd

For instance, they can say that there's little or no environmental impact without sufficient data, and that might not be true, and so I feel like there's a great deal of opposition from individuals, from families and from communities here to this project, and I think that's very important.

The next thing I would like to say is that I feel like there's really no limit to development. Development can -- there always can be new projects. There's definitely however, a limit to the habitats that we have here in the Rio Grande Valley locally, and to the waterways and what they can -- what those waterways can handle in terms of remaining viable for the wildlife in them and for the ecosystem here. There's a limit.

PM01-248 Thank you for your comment. Environmental and social concerns identified by the public, including local residents, are evaluated in the EIS.

And it's not that we are just coming up to the edge of a dangerous point. We're way past the edge of the dangerous point. There is much that is lost -- much that is desolate, and yet, there can always be a new idea to develop an LNG terminal and other pipeline, but there are limits to these habitats and waterways and ecosystems.

Second, along that same line, while there can be no limit to development, there are definite limits to species -- 50 ocelots, and it's not, again, not just that there are endangered species here, there are many species that are gone from here and yet we're pushing on with this development. PM01-249

And third, along that same line, while there's no limit to development, there is a limit to how clean the water and air is for people who live here, and you can always put in more pipelines, you can always put in more LNG terminals, but you can't necessarily make the air and water clean again once you have those. PM01-250

The third thing, I mean the final thing, I'd like to say is that this is not a project that the world needs. We don't need to start saying, well, we're going to ship this overseas. It reminds me a great deal of the tobacco industry. When they found that they would not be able to sell their cigarettes well in the United States, they turned to other markets. PM01-251

PM01 continued, page 108 of 110

PM01-249 Potential impacts on endangered species, including the ocelot, is evaluated in section 4.7 of the EIS, as well as in our Biological Assessment. See also response to comment CO6-8.

PM01-250 Thank you for your comment.

PM01-251 See response to comment CO6-20.

I found that highly cynical and terrible that they would do that. So, that's my comment, thank you.

MS. LEAL: Xandra Leal, X-a-n-d-r-a, and Leal is spelled L-e-a-l. The LNG Pipeline will hurt the entire planet. If the LNG Pipeline goes through it will go over the bodies of our ancestors. It will do too much damage to our planet. Commenting is inaccessible to the public because nothing is in Spanish, while almost all people speak Spanish. PM01-252

The LNG Pipeline will kill a lot of wildlife. What about the people? The ocelots are still endangered because they aren't going to use the tunnels. They are going to stick a shovel in the ground 36 times to see if there's anything there. Why? 36 times? How is that going to see if there's anything there? PM01-253

How will that solve the problem? It won't, it just won't, they're still going to bulldoze over it.

(Whereupon, the scoping meeting was adjourned.)

PM01-252 The Annova Project does not include a proposed LNG pipeline. With respect to availability of the draft EIS in Spanish, see response to comment CO6-3.

PM01-253 The Annova Project does not include a proposed LNG pipeline. With respect to the number of shovel tests conducted for cultural resources, see response to comment IND20-6.

CERTIFICATE OF OFFICIAL REPORTER

This is to certify that the attached proceeding before the FEDERAL ENERGY REGULATORY COMMISSION in the Matter of:

Name of Proceeding: Annova LNG Project

Docket No.: CP16-480-000
Place: Port Isabel, TX
Date: Thursday, January 10, 2019

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

David Downey
Official Reporter

Thomas R Smith, Cleveland, TX.

I am a private citizen who worked in the petro-chemical industry for about 40 years and have seen the destruction of land and resources due to chemical contamination. I am not really qualified to make a comment other than to keep in mind what Revelation 11:18 says when we make any decisions regarding our great country and state. Since most do not carry a Bible around with them I will quote "Revelation11:18 The nations were angry, and Your wrath has come, And the time of the dead, that they should be judged, And that You should reward Your servants the prophets and the saints, And those who fear Your name, small and great, And should destroy those who destroy the earth." Thank you for your consideration and God bless. Sincerely, Thomas R Smith IND01-1

INDIVIDUAL COMMENTERS

IND01 Thomas R Smith, page 1 of 1

IND01-1 Thank you for your comment.

January 4, 2019

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

Annova LNG Project Brownsville
Docket No. CP16--480-000

Dear Ms. Bose: Please find my comments on the subject docket, enclosed. To summarize, the DEIS does not satisfy the requirements of NEPA for several reasons, including:

- Perhaps the biggest problem with the DEIS, is the assertion that the proposed pipeline that is proposed by Annova LNG to provide gas for liquifaction for export, is a separate project, to be owned not by Anova LNG, but by an independent third party, and thus, according to this DEIS (e.g. FERC and Annova), not subject to NEPA analysis with the other projects proposed by Annova LNG here. This assertion must be rigorously evaluated by an experienced NEPA attorney. There is a large body of NEPA case law dealing with the issue of "piece-mealing" under NEPA. The assertion that this pipeline is not part of the rest of Annova LNG's project appears to be a ridiculous assertion, regardless of the legal technicalities. Undoubtedly, such piece-mealing was not envisioned by Congress as an acceptable way of avoiding NEPA, when the NEPA was passed. I will urge some interested party with the means to do so, to carefully critique the legality of this maneuver. I urge other parties to consider pursuing legal action against FERC and Annova on this point. Undoubtedly, the proposed pipeline will have greater wetland and other aquatic impacts, than the proposed liquifaction facility. IND02-1

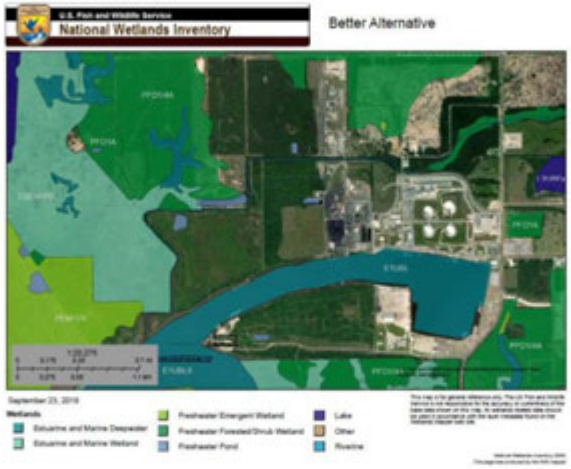
- Aside from the above maneuver, it is my opinion that the most serious environmental impacts of the proposed facilities, are their impacts to terrestrial endangered species, including (but not limited to), the ocelot and jaguarundi. Since I am not an expert on these species, I will defer to the U.S. Fish and Wildlife Service (USFWS) and Texas Parks and Wildlife Department staff regarding whether FERC and Annova have adequately disclosed potential impacts of the proposed project on these species. However, since the DEIS only states that Annova is still in discussion with USFWS regarding potential mitigation, it is obvious that FERC has not met the fundamental requirement of NEPA, by disclosing proposed mitigation to the public, for review and comment. FERC should issue a revised DEIS that includes this information, after USFWS and Annova have determined what mitigation will be proposed, for public review and comment. If FERC does not do so, I encourage some organization with the means to do so, to consider taking legal action against FERC, based on this failure to meet the fundamental requirement of NEPA. IND02-2

IND02 Kenneth Teague, page 1 of 7

IND02-1 Comment noted. Potential environmental impacts from the natural gas supply pipeline are addressed as part of our cumulative impacts assessment in section 4.13 of the EIS.

IND02-2 With respect to FWS and TPWD comments, see comment letters FA04 and SA02. The EIS discloses information on impacts and mitigation measures as known. With respect to the status of ESA consultation with the FWS, see response to comment CO10-65.

- A key requirement under NEPA, is consideration of alternatives. For the proposed project, consideration of alternatives to the proposed liquifaction facility is a key decision with very significant environmental effects. Both the sponsor and FERC failed to consider an obvious alternative location- a site on the east side of the Calcasieu River in Louisiana:
The alternative location is the undeveloped upland tract on the N side of the dredged artificial water body in the image above. While it is not certain this site would have fewer environmental impacts than the proposed alternative, this site would not have impacts on seagrasses nor would it impact threatened or endangered species. It probably would have greater impacts on wetlands then the proposed alternative however. IND02-3



IND02 continued, page 2 of 6

IND02-3 As stated in the EIS, Annova's stated purpose is to source natural gas from the South Texas Gulf Coast region. Our review of alternatives, however, expanded the area of our analysis to include the entire Texas Gulf Coast. We believe that the existing supply and pipeline network in the Texas Gulf Coast could meet Annova's objective for the source of natural gas, and this region of analysis would not significantly change the duration of LNG carrier transits. A site located on the Calcasieu River in Louisiana would require either an extended pipeline or a different natural gas supply network. We determined that locations this far removed from the proposal would modify the applicant's stated purpose and did not consider these further.

- The DEIS asserts that the proposed project will not result in dredging or disposal of dredged material that is contaminated. It bases this assertion not on its own analysis of dredged material testing data, but on the following report: IND02-4

  U.S. Army Corps of Engineers. 2014. Brazos Island Harbor, Texas, Channel Improvement Project, Final Integrated Feasibility Report-Environmental Assessment

  Upon reviewing the above report, I found that the only reference to any dredged material testing data is the following. No dredged material testing data are provided in this report.

  > *Three decades of water and chemistry data from the BIH have documented no concerns with contaminated sediments in the project area. Information describing the results of water, sediment, and elutriate water testing under current conditions are available upon request.*

  So, no dredged material testing data have been disclosed as part of this DEIS, nor were any dredge material testing data disclosed as part of the Environmental Assessment issued by the U.S. Army Corps of Engineers in 2014, which is the basis for FERC and the sponsor's refusal to provide dredged material testing data. Therefore, no dredged material testing data has been disclosed under NEPA (or any other authority) that would provide for public review of the potential for the proposed project to dredge or dispose of, contaminated dredged material. This does not meet the requirements of NEPA. While Annova has committed to test dredged material later, which is more than other proposed LNG export facilities have recently proposed to do regarding dredged material testing, this still does not meet the requirements of NEPA, for disclosure of environmental impacts to the public, with opportunity for the public to comment prior to final project approval. If FERC and Annova do not provide the public a DEIS that actually discloses dredged material testing data for contaminants, for public review and comment, then I urge an organization with the means to do so to take legal action against FERC and Annova, based on this failure to meet the requirements of NEPA.

- Seagrasses, highly valuable components of some coastal marine ecosystems, occur near the proposed dredging locations, including beds in the Bahia Grande, Mexique Flats, and South Bay Coastal Preserve. The seagrasses of the Mexique Flats have been identified as important habitat for the recently dramatically increasing population of juvenile green sea turtles, an endangered species, in the lower Laguna Madre (Metz and Landry 2013). Seagrasses are highly sensitive to decreases in light availability, such as occurs with elevated TSS. IND02-5

  - FERC and the project sponsor acknowledge that proposed dredging will result in increased concentrations of total suspended solids (TSS) in the Brownsville Ship Channel. However, they assert that this effect will be short-term and localized. To this DEIS's credit, apparently TSS as a result of dredging was actually modeled. This modeling determined that TSS would be elevated by 4 to 6 mg/l over "background" TSS concentrations, an increase of 11-17 percent, in the lower part of the Bahia Grande, up to 2.5 miles away from the dredge. However, the DEIS does not acknowledge that there are hundreds of acres of seagrasses in the Bahia Grande many of which could be affected by the increased TSS.

IND02-4 We have identified no indications that there might be contaminated sediments at the proposed Project site, therefore we do not consider it necessary to require testing of the area to be dredged. Without some indication that there is a concern for contaminated sediments, we maintain that previous studies and analysis are appropriate to establish baseline conditions.

IND02-5 The potential for the Project to impact seagrasses from turbidity caused by dredging is addressed in section 4.3.2.2 and 4.6.2 of the EIS. We have revised section 4.3.2.2 of the final EIS to acknowledge the potential presence of seagrasses in the Bahia Grande, however, no seagrasses are currently mapped in the Bahia Grande, nor is the Bahia Grande identified as an area containing seagrass in the TPWD's 2012 update to its Seagrass Conservation Plan.

- Annova proposes to dredge for approximately 8 months. If seagrasses are exposed to 8 months of elevated TSS, they will almost certainly be negatively impacted. IND02-5 Cont'd
- This represents a very significant potential impact, which was not disclosed or evaluated. FERC and Annova must disclose the existence of these seagrasses, and the risk factors I mention here.
- FERC and Annova must conduct an evaluation of the potential for these seagrasses to be impacted by dredging by Annova, as well as the potential for these seagrasses to be impacted by cumulative impacts of dredging by multiple LNG facilities. Another DEIS, completed by FERC for another proposed LNG facility here recently, acknowledged the potential for cumulative impacts of dredging by multiple LNG facilities, even though they didn't acknowledge the existence of seagrasses in Bahia Grande either.
- If these disclosures and additional analyses are not conducted and included in a revised DEIS, for public review and comment, FERC will not have met the requirements of NEPA. If this ends up being the case, I encourage other parties with the means to do so, to consider pursuing legal action against FERC and Annova on this point.

- FERC and the sponsor assume that most upland and wetland habitat impacts created by the proposed project can be reversed by restoration via revegetation by seeding. First, seeding is not the preferred method of revegetation in wetlands. Second, and more importantly, FERC and the sponsor acknowledge that climatic and other physical factors in the vicinity of the proposed project, make revegetation risky. Another DEIS issued for another proposed LNG facility, went further, including the results of actual discussions with local NRCS staff on this subject, who made it very clear that revegetation would be very difficult. This acknowledgement is in complete contradiction to FERC and Annova's assumption of simple restoration by revegetation. FERC and the sponsor must acknowledge that these facts are contradictory, and therefore their assumption that many of the habitat impacts (including wetland impacts) can be easily reversed with simple revegetation techniques, is erroneous. Therefore, proposed mitigation is inadequate. FERC and the sponsor must propose additional mitigation to compensate for the likely failure of efforts to revegetate. IND02-6

IND02-6 Annova's Plan and Procedures include measures designed to ensure temporarily disturbed areas are revegetated following construction, include post construction monitoring to determine revegetation success. However, our conclusions in the EIS related to habitat and wetland impacts is not contingent upon temporarily disturbed areas reaching a certain level of quality following construction. The potential need for mitigation for impacts on wetlands, whether temporary or permanent, will be addressed by the COE during review of Annova's Section 404/Section 10 permit application.

- The mitigation proposed to compensate for the project's impacts to wetlands and other waters of the U.S is interesting, successfully avoids the problems of proposing preservation-only mitigation, as two other LNGs recently did not, and have *bona fide* ecological restoration benefits. However, the proposal has some problems. IND02-7
  - First, and foremost, it is not clear that FERC and Annova have acknowledged and disclosed all impacts of the proposed project to aquatic habitats. More specifically:
    - FERC and Annova are attempting to avoid considering the required new pipeline that will supply the proposed LNG facility with natural gas, part of the project that is required to meet the requirements of NEPA. Therefore, FERC is avoiding disclosure of the environmental impacts of that pipeline. In addition, however, FERC actually asserts that the impacts of the pipeline on aquatic habitats are all temporary. While this seems to be the consistent assertion for all pipelines, it is clearly untrue. It is not certain that elevations/hydrology will be the same as they were prior to pipeline construction. It is certainly not clear that vegetation will be the same as prior to pipeline construction. Finally, even if similar wetland hydrology, soils, and vegetation are restored at the site of the pipeline, frequent mowing and elimination of woody vegetation using herbicides certainly impacts the wetlands and wetland functions. If you can see pipeline scars on the landscape from space, 50 years after pipeline construction, then it is likely that pipeline has had an environmental impact. Somebody needs to sue FERC and USACE on this ridiculous standard assertion. IND02-8
    - It also appears reasonably likely that the proposed project may have negative impacts to seagrasses in Bahia Grande, and potentially (via cumulative impacts) seagrasses in the Mexique Flats and/or South Bay. FERC and Annova must determine whether the proposed project will affect seagrasses, and if so, must either ensure the proposed mitigation will compensate for any seagrass losses, or propose additional mitigation. IND02-9
    - In addition, the proposed restoration will result in increases in aquatic habitat types, and likely, functions, that are different than those that will be lost as a result of the proposed project. More specifically, it is possible that the proposed mitigation project will not provide sufficient estuarine emergent marsh, and will provide a large excess of estuarine scrub shrub (mangrove). FERC and Annova must demonstrate that it is reasonably likely the proposed mitigation will result in sufficient estuarine emergent marsh to compensate for that to be destroyed by the proposed project. If this is the case, the additional mangrove will not be a problem. Rather, it will simply represent additional aquatic habitat. Finally, the proposed project does not provide any compensation for tidal flat habitats lost due to project construction. In fact, additional tidal flat habitat will be lost as a result of the proposed mitigation. It is not acceptable to sacrifice tidal flat habitat in order to create vegetated habitat (unless it can be demonstrated that this tidal flat habitat is actually degraded vegetated wetland habitat). Thus, FERC and Annova must propose additional compensatory mitigation for loss of tidal flats due to the proposed project and proposed mitigation. Perhaps there is a location where tidal flats were dredged or filled, which could be restored by restoring elevation (dredge or fill)? IND02-10
    - The DEIS and the Proposed Conceptual Mitigation Plan differ, regarding acreages of different aquatic habitat types that will be impacted by the proposed project. These discrepancies must be reconciled. IND02-11

IND02-7 Thank you for your comment.

IND02-8 We address the non-jurisdictional natural gas supply pipeline in section 4.13 of the EIS under cumulative effects. The COE is evaluating the supply pipeline as part of its review of the Section 404/Section 10 permit application.

IND02-9 See response to comment IND02-05.

IND02-10 See response to comment CO10-68. Impacts on tidal flats are acknowledged in the EIS, however mitigation for these impacts would be under the jurisdiction of the COE if considered appropriate during the COE's review of Annova's application to the COE.

IND02-11 See response to comment CO10-68.

- The Proposed Conceptual Mitigation Plan (Plan) does not provide goals or objectives for specific habitat types, based on acreage. In order to ensure that the requirement of the Mitigation Rule, that compensatory mitigation be *in kind*, is met, the Plan must include specific mitigation goals/objectives, by habitat type, based on acreages. It is not acceptable to ignore habitat type and acreages, and simply view proposed mitigation in terms of roughly estimated functions, with no consideration for actual habitat type. Estuarine emergent marsh, particularly in this region, is not at all similar to estuarine scrub shrub, or mangrove. It is not acceptable to compensate for loss of the unique types of estuarine emergent marsh here, by providing additional mangrove shrub scrub. Compensation must be *in kind*, by habitat type. IND02-12
- The Proposed Conceptual Mitigation Plan provides almost no details regarding what Annova proposes to do at the site. Most wetland restoration projects include detailed elevation and hydrology data. The limited engineering information provided is unclear. While the proposed project is based on hydrologic restoration, no estimates of actual changes in hydrology are provided. What is the current frequency and duration of an ecologically meaningful water surface elevation? What will the frequency and duration of flooding of wetland plants be, after the mitigation project is constructed?
- I recommend the proposed mitigation project be based on a Reference Area. Goals and objectives for hydrology and vegetation should be based on reference conditions. Both reference area and mitigation site should be monitored.
- Monitoring should be scientific and quantitative. Simple visual "monitoring" and "judgement" based monitoring is not sufficient.
- The Plan must include commitments to provide long term maintenance funds. The proposed mitigation site will almost certainly require maintenance dredging of the tidal channels. Required compensatory mitigation is required to be of infinite longevity, as would likely be the habitat that is to be destroyed, in the absence of human destruction.

These comments represent an overview of my concerns for the DEIS. While FERC and other agencies may expect reviewers to document specific sections, pages, paragraphs, and sentences, that represent specific concerns, the effort such a review and comment process would require represents a poor use of my time. FERC staff and their contractors are certainly capable of identifying sections, pages, paragraphs, and sentences of the DEIS on which my more general comments are based. The fact that I am not identifying such specific sections, pages, paragraphs, and sentences in the document, should not detract from the validity of my more general comments.

Sincerely,
Kenneth G. Teague, PWS, Certified Senior Ecologist
Austin, TX

IND02-12 See response to comment CO10-68.

Gary Richards, Harlingen, TX.
Following are my concerns on the Annova LNG Brownsville Project (LNG).

The construction of these LNG projects would bulldoze the pristine coastline of South Padre Island. Ugly storage tanks, and smoking flare stacks will dominate the skyline. People in the RGV do not need the added air pollution. Trucks carrying flammable fracked gas will pose a safety hazard to busses of children and citizens driving on those same roads. In addition, it will utilize valuable tax revenues to repair the roads. IND03-1 IND03-2 IND03-3

The National Wildlife Refuge Service spent tax revenue to buy up land in the proposed area. This insured wildlife a place to travel, rest and nest. Pipeline construction would damage prime wildlife nesting and migratory areas. IND03-4

These areas also bring in revenue from tourism. Projects such as LNG would hurt this business as money for those activities (birding, nature, fishing, beach-combing, etc.) decline. Tourists do not want to see or smell ugly smoke belching stacks where they recreate. IND03-5

In summary, LNG would be environmentally damaging to the RGV. It would waste valuable tax revenue. Light pollution, increased commercial traffic and air pollution are things we do not need in the valley.

For all the above reasons, I oppose the LNG project.

Gary Richards
Harlingen, Texas

IND03 Gary Richards, page 1 of 1

IND03-1 The Annova Project is not proposed to be located on South Padre Island. The potential visual impacts from the Project, including from LNG storage tanks and flare stacks, are addressed in section 4.8.5 of the EIS.

IND03-2 The potential impacts from air emissions are addressed in section 4.11.1 of the EIS. The proposed Annova Project would not include trucks transporting fracked gas, or LNG.

IND03-3 The potential impacts on local socioeconomics, including public services and taxes, is addressed in section 4.9 of the EIS.

IND03-4 We address the potential impacts on the National Wildlife Refuges in several locations in the EIS, including in sections 4.8.4, 4.8.5, and 4.11.2. Potential impacts from the non-jurisdictional natural gas supply pipeline are addressed in section 4.13.

IND03-5 The potential impacts on tourism are addressed in the EIS in sections 4.8.4 and 4.9.

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jim russell, cicero, IN.
Own property in Boca Chica Tx and would like to see this LNG project completed for the good economy it will impact RGV. IND04-1
The current modern technology available will keep the local environment on the same good level it now enjoys with clean air and nil climate change. IND04-2
Trust the FERC will do their right progressive leadership role and approve this project. My grandchildren need such forward decisions.

IND04 Jim Russell, page 1 of 1

IND04-1 Thank you for your comment.

IND04-2 Thank you for your comment.

Sumner Herrick, Los Fresnos, TX.
I have read the document of the in-depth study of the planning and construction of Annova's proposed LNG terminal along the south bank of the Brownsville Ship Channel. I would like to thank the commission for a very interesting, well-documented, and thorough study of Annova's proposal. IND05-1

I am interested in preserving an intact environment, as much as that is possible. However, FERC's findings of "less than significant" impacts for most-if not all-aspects of the projects leads me to conclude that the project should proceed, PROVIDED
Annova fulfills all the recommendations that have been delineated in bold print in the report.

I would also like to say that people whom I will term as "radical environmentalists" sounded loud alarm bells prior to the construction of the wind farms in the area, citing damage to migrating birds hitting the wind turbine blades. Apparently, that has not come to pass, and their opposition can be described as alarmist. I hope the same people don't win the day on this proposal if Annova does what it says it will do, and what the commission requires it to do.

IND05 Sumner Herrick, page 1 of 1

IND05-1 Thank you for your comment.

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Justin Vosburg, Harlingen, TX.
I have lived in Harlingen for 7 years now and am excited about the possibility of a LNG project being located in Brownsville Texas. I know a lot of fisherman and out door enthusiasts and even Texas Parks and Wildlife employee who has been notified about the planned pipeline for the Annova LNG project. I am confident that Annova LNG will do all they can to protect and preserve the natural habitat as they begin construction and as an operator once they are open for business. I look forward to the opening of the LNG facility as it will bring good jobs to the area and will attract other like minded businesses.

I believe that the Rio Grande Valley has lots of growth potential for business and industry and would like to see the regional economy grow into the potential it has.

I fully support Annova LNG being approved for operation in Brownsville Texas.

Justin Vosburg
Harlingen Texas resident

IND06 Justin Vosburg, page 1 of 1

IND06-1 Thank you for your comment.

IND06-2 Thank you for your comment.

Re: Annova LNG Permit Application Docket No. CP16-480-000 submitted by Annova LNG Common Infrastructure, LLC.

I respectfully request that this permit be denied because their is insufficient information, the mitigation proposed is inadequate, and the affected area is too environmentally sensitive and irreplaceable. If the permit is not denied a true public hearing should be held. IND07-1 IND07-2

Mitigation IND07-3

The proposed wetland mitigation is to re-flood Little San Martin Lake. This area is already owned by FWS and re-flooding could easily be done by them if they choose to do so. This proposal is in no way commensurate with the destruction of 53 acres of estuarine emergent marsh (EEM). The so named Scrub-Shrub (mangroves) are essential to maintaining the current eco-system in place. Mangrove forests are among the most productive ecosystems on earth, and serve many important functions, including water filtration, prevention of coastal erosion, coastal protection from storms, carbon storage, food, timber, and livelihood provision, and biodiversity protection, among others. This is according to numerous sources including but not limited to World Wildlife Foundation, Oceana, The Florida Museum of Natural History, and the Global Mangrove Alliance. This would be an unacceptable net loss of wetlands. All impacts to wetlands should be mitigated, including the 42.1 acres of wetlands impacted by the construction of the pipeline. The "maintained" 50-foot Right-Of Way would never allow the normal succession of mature vegetation, diminishing its wetland value and function. Additionally, the use of wetlands for temporary workspace for pipeline construction is a deviance from FERC procedures and should not be allowed. IND07-4 IND07-5

The pipeline project is questionable and the FERC should verify whether Valley Crossing has agreed to supply gas to Annova. VC has publicly stated (2017) they will not. Annova has not identified who will own, construct, and operate the 9 mile connecting pipeline, so who is the legally responsible party? We do not need another abandoned or mismanaged facility. IND07-6

Lomas IND07-7

Two of the EEM wetlands that Annova proposes to destroy are surrounded by lomas. Lomas are rare and unique clay hills that rise above the surrounding wind tidal flats and contain dense shrub and stunted forest vegetation. They number less than 15, are of immense value for wildlife, and are

IND07 Mary Branch, page 1 of 5

IND07-1 The Commission will consider the analysis in this EIS, including comments such as this one, as part of its determination of whether or not to authorize the Project.

IND07-2 As a matter of practice the Commission does not hold public hearings during its review of LNG projects.

IND07-3 See response to comment CO10-68.

IND07-4 See response to comment CO10-68 and IND2-08.

IND07-5 The natural gas supply pipeline is a non-jurisdictional facility and therefore not under the jurisdiction of FERC.

IND07-6 See response to comment CO4-07.

IND07-7 Potential impacts on lomas are described in several locations in the EIS. The COE is currently reviewing Annova's Section 404/Section 10 permit for the proposed wetland impacts.

essentially irreplaceable. The Corps should not allow the destruction of these 2 loma-surrounded wetlands. IND07-7 Cont'd

Horizontal Directional Drilling should be required wherever the pipeline goes through wetlands, not just for going under the Ship Channel. To do otherwise is to violate the "minimize impacts" requirement. IND07-8

CUMULATIVE IMPACTS OF MITIGATION PROPOSALS IND07-9

The mitigation proposal by Annova LNG is negated by other projects, thus the FERC should require a cumulative analysis of all 3 LNG projects and the Valley Crossing Pipeline. This is absolutely critical to the overall evaluation of the damage this additional project would incur. One example is the existing Valley Crossing compressor station, which is adjacent to San Martin Lake. This would impact Annova's proposed (but entirely inadequate) Little San Martin Lake mitigation. Another example of the need for a cumulative analysis is the proposed mitigation by Texas LNG and Rio Grande LNG. These would both be in the Loma Preserve and close to the Annova site. (They are also equally if not more inadequate proposals than is Annova's). How will the 24-7 lights, noise and traffic affect the likely outcome of the 3 LNG projects' (and the Valley Crossing compressor station) proposed wetlands mitigation? A cumulative analysis and more detailed information is very much needed and should be required.

ADDITIONAL CONSIDERATIONS IND07-10

Historically, these wetlands, including the Bahia Grande unit (which will be considerably affected,) served as an important nursery for a wide variety of fish and shellfish and was important habitat for wildlife and wintering waterfowl. The natural tidal flow between Bahia Grande and the Laguna Madre was cut off by oil and gas construction projects in the 1930's and 1950's. For nearly 70 years, the degraded wetland was a source of blowing dust, a site of massive fish kills, and a complicated natural resource problem. Today, Bahia Grande is considered one of the largest and most successful coastal wetland restoration projects in the United States. Why would you consider impacting it again with oil and gas industries when it is just now recovering? Another 70 years to recover is not acceptable. There is no effective mitigation plan in place to assure this will not happen again. Especially with three projects and four pipelines.

In 2000, Laguna Atascosa National Wildlife Refuge acquired the 21,700 acre Bahia Grande Unit located between the towns of Laguna Vista and Brownsville, Texas. Almost half of the unit is wetlands, including the 6,500 acre Bahia Grande basin for which the tract of land was named. Since the Bahia Grande is now IND07-11

IND07-8 The natural gas supply pipeline is a non-jurisdictional facility and therefore not under the jurisdiction of FERC.

IND07-9 A cumulative impacts analysis that includes the Rio Grande LNG and Texas LNG projects, as well as the Valley Crossing Pipeline, is included in section 4.13 of the EIS.

IND07-10 Comment noted. The significance of Bahia Grande, and the potential impacts of the Annova Project on this system, as well as the potential cumulative impacts of the Annova Project combined with other projects, is evaluated in the EIS.

IND07-11 The FWS estimated that the amount of dense shrub vegetation available in the Laguna Atascosa NWR and the surrounding area (within a 13.7-mile buffer around the refuge, the Project site being located just outside this buffer) is 19,200 acres. This is the habitat that is important for the ocelot. Construction of the Project would impact less than 1 percent of the dense shrub vegetation within a 13.7-mile radius around the Laguna Atascosa NWR. As explained in the EIS, we have determined that past and present cumulative impacts on ocelots and jaguarundis are significant and the future projects considered here will only increase this impact. That is, the addition of LNG terminals would not create a significant impact, they would merely exacerbate an existing significant cumulative impact.

part of the Refuge, this permit and all such permits should be denied based on destruction of the Wildlife Refuge per Section 7 of the ESA on endangered and threatened species. Your DEIS clearly states on page 31 of 452: The proposed Project, Rio Grande LNG, and Texas LNG Projects, as well as the pipeline projects proposed in the area, are anticipated to have the greatest cumulative impacts on ocelot habitat through removal and conversion to industrial uses and fragmentation, respectively. In addition, these projects along with several of the transportation projects could result in increased road traffic and/or additional roads for transiting ocelots and jaguarundis to cross, thus increasing the potential for vehicle strikes. The current remaining habitat corridor in the region to connect U.S. and Mexico populations of these federally listed species is within and adjacent to the proposed Annova Project site on the south side of the BSC, and adjacent to and within the proposed Rio Grande LNG and Texas LNG Project sites north of the BSC. Other impacts, such as those associated with noise, would be minimized by the projects to the extent practicable; however, due to the proximity of the proposed Annova Project and Rio Grande LNG Project to the wildlife corridors, facility-generated noise during construction and operation would still be audible to ocelots and jaguarundis utilizing the wildlife corridor. Due to the past, present, and proposed future development throughout the geographic scope for assessing cumulative impacts on ocelots and jaguarundis, as well as the associated increases in road traffic, light, and noise, we have determined that cumulative impacts on ocelots and jaguarundis would be permanent and significant. IND07-11 Cont'd

In 2005, a pilot channel was constructed that connected the Brownsville Ship Channel to the Bahia Grande and the waters began flowing into the main basin and refilling the wetland. In 2007, two interior channels were cut that reconnected the larger basin to two smaller interior basins – the Laguna Larga and the Little Laguna Madre -- ensuring natural tidal flow and exchange throughout the whole system.

While more work remains, once fully restored, the 10,000 acres of wetlands will enhance habitat for wildlife and fisheries, improve environmental conditions in surrounding communities previously affected by blowing dust, provide opportunities for recreation and environmental education, and contribute to the local economy through increased nature tourism. The construction of Annova LNG pipeline and terminal will negatively return this area to its previous degraded condition. The application should therefore be denied. IND07-12

A partnership of more than 65 groups known as the Bahia Grande Restoration Partnership collaborated to restore the degraded wetland. Partners included local, state, and federal agencies; municipalities; educational institutions from the secondary to university levels, commercial and recreational fishery organizations; corporations and foundations; local, state, and national conservation organizations; and private citizens and landowners.

IND07-12 See response to comment IND7-10. Also, impacts on the Bahia Grande would not itself be reason to deny authorization of the Project. However, the Commission will consider these impacts as part of its determination of whether or not to authorize the Project.

In 2007, the Laguna Atascosa Refuge and the 65 collaborating partners were recognized in the Presidential Wetlands Report and are proud recipients of the National Wetlands Conservation Award and the Coastal America Partnership Awards. I doubt that Annova LNG, Rio Grande LNG, Texas LNG, USACE and FERC will have such a noble resume when it comes to these wetlands and refuge IND07-12 Cont'

With the hydrology restored, this tidally affected lagoon system has once again an important nursery for finfish such as red drum and shellfish such as shrimp and blue crab. The interior islands are attracting breeding waterbirds such as gull-billed terns, skimmers and more recently the first nesting pair of brown pelicans in south Texas since the 1920's.

- Further, the petition on Annova LNG's website to encourage people to sign in favor of approving the project is false, misleading, fraudulent and biased. To wit: 1. 700 onsite jobs filled in the RGV. Not true. The indigineous population of the RGV is primarily (35-45%) under the poverty level. The skilled labor needed to construct, operate, maintain and oversee this facility is severely lacking in the RGV. They will not employ 700 skilled laborers from the Valley. And, upon completion, only 165 of those jobs will be permanent and according to Annova will pay $70K/annually. Again, where is the skilled labor to garner that salary? Not in the Valley. 2. This will be a boost to other businesses in the area. Wrong. There are not that many engineering and design firms, nor construction contractors suppliers and service providers in the area. There is no sufficient skilled labor pool in Cameron County to support this both on operational and safety issues. 3. LNG is non-flammable, will not explode and has no odor. False. A vapor cloud or vapor pool is fatal if ignited. Look at the history of LNG plant explosions. They are always catastrophic. In Austin this year they evacuated a 4 mile radius of an overturned propane delivery truck for fear of a vapor cloud ignition. 4. Annova will serve a niche market. They have no market that has agreed to take import their product. Please have them produce the so named contracted companies. I 5. $40 million given to the Caesar Kleberg Wildlife Institute at Texas A&M Kingsville for GPS collars. Fraudulent. I would like to see the appropriations of that $40 million. It is not all going to tracking collars. Tracking collars for animals runs from $20 to $300. There are not that many Ocelots to track that would incur $40 million in collar costs. After all, they are already ENDANGERED. As a state and federal taxpayer, I demand to see where that public institution money is going. I call foul on everything they have stated. IND07-13 IND07-14 IND07-15 IND07-16

PUBLIC HEARING & PERMIT ISSUANCE

IND07 continued, page 4 of 5

IND07-13 Comment noted. Estimated jobs that would be created during construction and operation are addressed in section 4.9 of the EIS.

IND07-14 Reliability and safety is addressed in section 4.12 of the EIS. We note that LNG is a form of methane, not propane, and the two gases behave very differently when released.

IND07-15 The Commission will evaluate Project need during its determination of whether or not to authorize the Project.

IND07-16 The Commission does not monitor information on an applicant's website. We rely on information filed with the Commission under oath.

A public hearing is needed to ascertain more information on the pipeline project and cumulative impacts to mitigation proposals by other projects. IND07-17

For all the reasons above the FERC should deny or withdraw Permit Application Docket No. CP16-480-000.

Due to the partial government shutdown and the inability of other federal resource agencies to fully evaluate and respond to this permit application, the comment deadline should be extended. IND07-18

IND07 continued, page 5 of 5

IND07-17 As a matter of practice the Commission does not hold public hearings during its review of LNG projects.

IND07-18 The public comment period on the draft EIS was extended to March 13, 2019.

ORIGINAL

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REGULATORY COMMISSION

Docket # CP16-480-000

IN RESPONSE TO A REQUEST FOR COMMENT,
I would like to say that I oppose ANY
further INVESTMENT IN fossil fuels
ACROSS the BOARD. IND08-1

I support the RESIDENTS of the RIO GRANDE
Valley who ARE Also opposed TO A pipeline
OR ANY OTHER MASSIVE INVESTMENT IN
fossil fuels, CITIZENS WANT A
"green REVOLUTION" IN THIS COUNTRY.

THANK YOU
MARIE NORRELL

IND08 Marie Norrell, page 1 of 1

IND08-1 Thank you for your comment.

Comments re: Draft Environmental Impact Statement:

Annova LNG Brownsville Project docket CP 16-480-000. drsarahbishopmerrill@ICloud.com
Dr. Sarah Bishop Merrill, Harlingen, TX, *2214 E. Pendleton, Hgn, TX 78550. 956 230 1263.*
https://www.ferc.gov/docs-filing/ecomment.asp?crt=8484923582566134285

ANNOVA LNG Docket CP16-480-000

I oppose the proposed ANNOVA project, Docket CP16-480-000 because the applicants have not shown adequate mitigation for wetlands and loma/brush IND09-1
habitats; nor is the location far enough from the Space X site to prevent VCEs, IND09-2
which will be not only major safety disasters, but economically prohibitive. See below in the Safety section for specific arguments against permitting this project.

Introduction: First Some Basic Logic:

With respect for the effective and responsive FERC Staff, I am grateful for the opportunity to comment on the two projects named above. I describe very specific concerns below, with citations and further questions needing responses. The Draft EIS for the Texas LNG Project, prepared by FERC staff, in itself shows clearly that this project is unacceptable, unsafe and environmentally unsatisfactory. Any persons or body of public decision-makers of sound mind would decide against these proposed projects. If they rule otherwise, they commit several basic flaws in basic logic and methods of data assembly. **Science, law**, responsible decision-making for the future, and **protection** of the public and common good are all based upon **logic**: the truth of facts contained in premises properly related. Here is the faulty reasoning about the above-named LNG proposal as described in the FERC DEIS:

a) **Begging the Question and Assuming a False Premise, viz., re: Mitigation** IND09-3

Its methodology **begs the question**, or reasons in a vicious circle: it pre-judges the LNG project as a given, to be followed by another LNG project now in the approval process.

This project is presented as subject to appropriate mitigation for significant unacceptable and illegal impacts, when no such mitigation is shown to be nearly adequate to the huge and irreversible scope of damage expected; and, in another slip of logic for the sake of public relations and profit, (so, "too broad"); indeed, their assumption laughable proposal that **mitigation** consist of merely "preserving" (past the lease renewal in a few years? likely not!) a small portion of wetlands **already** under Fish and Wildlife management and protection shows that they will act in disregard of the facts about highly significant harm to vulnerable wetland which they themselves acknowledge elsewhere. Only a completed and widened **Wildlife Corridor** could help mitigate these massive risks, but it is a monumental task.

Costs of this wildlife corridor would be substantial, (Conservation Fund experts estimate mitigation costs at about $ 100 million), but these could be reduced using our networks of Master Naturalists and the Rio Reforestation Project replanting efforts recruiting thousands

IND09 Dr. Sarah Stueber Bishop Merrill, page 1 of 16

IND09-1 Thank you for your comment.

IND09-2 Thank you for your comment. See responses to individual comments below.

IND09-3 With respect to the mitigation plan for wetland impacts, see response to comment CO10-72. With respect mitigation for impacts on wildlife habitat, including preservation of a wildlife corridor, see response to comments CO10-57 and CP10-58.

several times a year here. Many thousands of school children have helped plant wildlife habitats in the Valley. We in the Sierra Club and other Valley groups have long been working on the Wildlife Corridor to being to help defend our many threatened and endangered species here in the Lower Rio Grande Valley. The LNG developers would have to purchase at least 200 more acres of wetlands, and the remaining land with willing sellers between the Bahia Grande and the Laguna Atascosa National Wildlife Refuge. Mitigation cannot, as suggested in the DEIS, ever consist simply of continuing to preserve land already under the protection of another party. IND09-3 Cont'd

b) **Major Explosive Methane Risks Are Completely Overlooked:** The methodology and "findings" about security relative to the LNG facilities' proximity to the SpaceX launch site at Boca China (well within the illegal ten mile radius), are so narrowly focused as to constitute serious fallacies in thinking: :Flashlight Fallacy" and "Begging the Question or Circular Reasoning, by assuming the project can be built legally; Complete Non-Sequiturs occur here: e.g. (premise:) "There are significant impacts, so (bad conclusion:) it's OK to build anyhow." The fallacy of misplaced precision ("Flashlight Fallacy") occurs in the studies cited of VCEs. IND09-4

The Arguments (Sets of Reasons, Properly Related Logically) Against LNG in the RGV: IND09-5

There are four key reasons why the FERC should refuse to permit the dangerous, unnecessary, and obsolete Texas LNG project, and the pipeline feeding it. These are organized under the headings:

I. **Public Safety, Noise, &VCEs;**
II. **Unsatisfactory Mitigation in DEIS;**
III. **LNG is Obsolete; Not Economically Feasible (Trade War, China Taxes US imports); and Applicants' Projects Use Fracked Feedgas; Worsens Climate Change in many ways**
IV. **Air Pollution: Dangerous gases and particulates**

I. **Public Safety, Security and Noise Impacts Are Significant.** This is a **False Assertion: "Construction & operation of the pipeline facilities would not contribute to significant cumulative noise impacts…" (from the DEIS)** IND09-6

This false claim must resubmitted for further environmental analysis using comparable LNG sites. The purported quantifications listed in this DEIS should be questioned by those qualified to do so, at other LNG sites, -not a question-begging fallacy which posits deliberately false, fudged data. As Prof. Berg (UT, ENGG) pointed out at early hearings several years ago, the compressor noise alone would drive all wildlife away, for miles around, permanently. The security issues have already been discussed above, relative to the known pooling of Methane, which unlike LNG, is flammable in its gaseous form if fires occur. No IND09-7

IND09 continued, page 2 of 16

IND09-4 We disagree.

IND09-5 We assume the commenter is referring to the Annova LNG Project and not the TX LNG project. See responses to individual comments below.

IND09-6 As stated in table 4.13.1-1 of the EIS, the geographic scope for our cumulative impacts analysis for noise is any project that can cause an impact to an NSA within 1 mile of the proposed Annova LNG Project. There are no pipeline compressor stations located within this geographic scope.

IND09-7 DOT PHMSA's LOD issued on March 20, 2019 evaluated the overpressure or blast wave effects due to an explosion of flammable vapor. Specifically, section 9.5 of the LOD analysis showed the overpressure hazards would remain within the Project's property line and could extend into the Brownsville Ship Channel. In addition, section 4.12.5.6 of the EIS discusses Annova's design to protect against storm surges. To ensure the site would be protected from storm surges, we recommended in section 4.12.6 of the draft EIS that Annova provide a wave overtopping analysis for a 500-year storm that also accounts for sea level rise. Annova provided this analysis to show how the facility would be protected in the event of storm surge and flood inundating the facility. We have included a recommendation in section 4.12.6 of the final EIS that Annova demonstrates how the Project would be protected against wave run-up from the 500-year event. In addition, the facility would be designed to withstand a Category 4 hurricane. FERC staff also recommends in section 4.12.6 of the EIS that Annova implement a routine monitoring plan to ensure that the site does not fall beneath an elevation of 16.5 feet NAVD 88, and the earthen berm be maintained at an elevation of no less than 21 feet NAVD 88.

system of transport and transfer from pipeline into the LNG facility, and in the loading process into tankers, is perfectly flawless. Operators are never as careful or "perfect" as design engineers. IND09-7 Cont'd

As a professor at Purdue University and Kansas State, I taught Engineering Ethics, as well as Environmental Ethics units and Ethics Across the Curriculum for more than 20 years. I know that engineers receive little training in the ecological and health systems they impact, but that they pledge first of all, in their codes of ethics, to protect, first of all, (before profits) "the safety and health of the public," in their work. Indeed, they were often highly ethical, principled Kantian thinkers, who solved problems for the common good with their professional skill sets. They know they are governed by regulations which their professional societies, e.g., the American Society of Civil Engineers, helped to write, and aid in implementation and enforcement. Professional engineers are problem-solvers, not corporate public relations people or advertisers. The lose their licenses if they lie or mislead the public, and their professional support truth-telling, —even whistle-blowing by engineers who document the facts. Even one major explosion at this site would lead to serious legal penalties and costs to all involved in approving/permitting the LNG projects given what we know.

But instead of seriously studying this serious risk to the public safety, the DEIS shows that the reasoning and testing methodology of the LNG and Pipeline project proposers commits the serious illogic of the "Flashlight Fallacy." In short, they did not look at the major risk of the Vapor Cloud Explosion (VCE's) of the pooled Methane above the LNG site, being blown around the whole region by prevailing winds, if and when a fire elsewhere erupts.

In fact, Vapor Cloud Explosions (VCEs), as well as destruction and undermining the facility by storm surges and rising coastal water levels, will occur. It is highly likely that, contrary to FERC's own requirements, the storm surges and rising Gulf water levels will disastrously damage **"cryogenic transfer piping; marine/cargo unloading platforms; primary and emergency electrical power;..." (FERC Guidance Manual)** No one who has survived a massive hurricane making landing expects the power to remain on. Locating this LNG facility here on the Gulf Shore near Bahia Grande, Port Isabel, and Brownsville, TX, within blast range of schools, popular fishing, and commercial shrimping areas, is shear folly, and a direct contradiction of FERC's own policy.

A. Serious Risk of Catastrophic and Widespread Fire Storms: IND09-8

FERC has required, since at least 2005, that applications for liquefied natural gas (LNG) import terminals include fire protection. FERC adopted the National Fire Safety Standards, which were revised in 2003, based upon the 2001 edition of National Fire Protection Association (NFPA) Standard 59A. (These have also been U.S. Department of Transportation requirements for at least 15 years.)

But as the LNG project approval process has "progressed," our local uniformed services, especially firefighters, have come to us to report that they have had no training or equipment to deal with the massive sort of fire storm which an LNG explosion brings. No funding or equipment can be provided for this eventuality. A VCE in this region is not

IND09-8 Section 4.12.5.8 of the EIS as well as a FERC staff recommendation in section 4.12.6 discuss a Cost Sharing Plan. This plan would highlight how Annova would cover the costs of state and local first responders that are required for the security and emergency response for the site. First responders would have an opportunity to discuss any resource or training need during this consultation. DOT PHMSA and Coast Guard also have training requirements of personnel involved in emergency response. We also note that NFPA 59A (2001) was revised and issued in 2006, not 2003.

unlikely, given the live rocket fuel which SpaceX launches will involve, ***within ten miles of the proposed LNG plant.*** ***Safety studies have completely ignored risks of pooled gas above.*** IND09-8 Cont'd

FERC's Guidance Manual requires applicants (under 18CFR, 380.12, 49 CFR Part 193, and ASCE 7) "to demonstrate that the potential hazard to the public from failures of facility components resulting from natural catastrophes is addressed, and that there would not be a significant impact on public safety from seismicity and other, natural hazards at LNG facilities." (quoting from Background section of Guidance Manual). The scope of natural catastrophes in coastal areas given the new normal of extremes due to climate change is so vast today that the LNG proposers can neither demonstrate nor address such potential hazards, —now much more likely to occur. IND09-9

In the case of the Chinese port explosion in August 2015, cars were thrown more than a kilometer away from their original location under the 3 massive explosions at a port location where some journalists reported they suspected LNG was being imported and reprocessed for use, near where stored toxic chemicals were ignited, and the "whole sky" appeared to explode very high above skyscrapers. in general, it is well known that LNG has a relatively high cost of production and needs to be stored in expensive cryogenic tanks; though it explodes only when trapped in a certain space, its by-products after liquefaction with a source of ignition, its vapors in a pool in the sky above the facility, or blown downwind, may burn more readily when other fires or, say, live rocket fuel, are present. IND09-10

We, the environmental advocates and citizen scientists (individual Certified Texas Master Naturalists, and others who have studied these issues "on our own nickel" and not representing any body but that of scientific truth) are concerned about a possible problem not mentioned so far, that CEII, the "Critical Energy Infrastructure Information" not be abused to hide actual risks, under bogus "security" and "Trade Secrets" cover stories. There are such serious risks to public safety in the LNG project that failure to disclose and consider them would not be excused, when a disastrous explosion occurs, by an industry-pressured move to force FERC to approve an inherently unsafe and polluting project. Accidents do happen. The "Titanic Effect" of allowing those selling the project to claim it is flawless and "cannot go down" (as with the tragic Titanic sinking, in fact) appears to be in effect with regard to FERC vulnerability to the people "selling" us the whole LNG process, somehow without reason or logic, eliminating the significant impacts and risks by saying it, as if a magic wand were waved. And as if the withholding of crucial information about VCEs were not enough, there is the recently-reported news of the catastrophic impacts expected from Climate Change, including, in short, **major crop failure** here in Texas due to alternating floods and droughts. IND09-11

The Fourth Annual U.S. Report on Climate Change, released on the Friday of Thanksgiving week-end, 2018 (weeks ago as of this writing), presents the Rio Grande Valley of Texas as a major Case Study, which I present in full prior to discussing storm surges:

"FOURTH NATIONAL CLIMATE ASSESSMENT Volume II: Impacts, Risks, and Adaptation in the United States," U.S. Global Change Research Program, released 11-23-2018,

IND09-9 Section 4.12.5.6 of the EIS discusses how the Project would be resilient against natural hazards such as geological, meteorological, and hydrological events. Sea level rise has also been considered in the analysis. In addition, the facility has been designed to withstand natural hazards (such as earthquakes, hurricanes, and winds) based on mean return intervals in accordance with federal regulations and best practices. Also see response to comment IND09-013 for statement on recent hurricanes.

IND09-10 DOT PHMSA's LOD issued on March 20, 2019 evaluated the overpressure or blast wave effects due to an explosion of flammable vapor. Specifically, section 9.5 of the LOD analysis showed the overpressure hazards would remain within the Project's property line and could extend into the Brownsville Ship Channel. In addition, we evaluated whether layers of protection would be in place to reduce the risk of offsite impacts on the public from hazards, including explosions. Based on the proposed layers of protection, FERC staff recommendations, and DOT PHMSA's LOD, we find that the risk of potential impacts from explosions were sufficiently evaluated.

IND09-11 See response to comment IND9-9.

https://nca2018.globalchange.gov/?fbclid=IwAR2b68JTOso-RrQ9fZgKN9FdBjoK4vb3GFBvi_pCGI6yKHr2XRv25wil34U. The following is from Chapter 23 that covers the Southern Great Plains (Kansas, Oklahoma, and Texas) at https://nca2018.globalchange.gov/chapter/23/ IND09-11 Cont'd

(Citations of relevant research documenting claims is numbered below, but edited out. See link.)

Case Study: Rio Grande Valley and Transboundary Issues

*In the U.S.–Mexico transboundary region of the Southern Great Plains, no hydrologic resource is more critical than the Rio Grande and its attendant tributaries. Partnered, binational management of the basin's water supply is essential to supporting the agricultural, industrial, and community infrastructure in place along the Rio Grande valley. Proactive and collaborative water management strategies allow for effective flood control, mitigation of drought impacts, and maximization of water quality, among other benefits.42. The Rio Grande is highly sensitive to variations and changes in the climate of the Southern Great Plains, where changes can have marked impacts on the valley's extensive agricultural productivity.43, 44 Increasing regional temperatures,45 consistent with global trends, will enhance the severity of drought impacts via the acceleration of surface water loss driven by evaporation, particularly in large Rio Grande reservoirs such as Lake Amistad. Changes in regional precipitation patterns, including observed increases in extreme rainfall events as part of a regional "dipole" dry-wet-dry-again pattern,10 will affect both drought and flood occurrence and intensity along the Rio Grande channel. Other climate-driven impacts, such as changes in wildfire frequency46 and increased vulnerability to heat events,40 will further challenge the preparedness and resilience of communities on both sides of the border. (**End quote** from 4th Annual US Climate Change Report. See links provided above for details and report summary.)*

The import of this very important scientific report is that if we do not positively mitigate harms our GHGs are causing atmospherically, and stop new fossil fuel projects like LNG, we cannot prevent inevitable catastrophic suffering, famines, and uninhabitability of major parts of the region, including the Brownsville Ship Channel's "lands" on which the LNG is to "stand," — which will likely be entirely swept away by storm surges of the future. The LNG sites will be under water permanently within ten years. Climatologists' predictions are highly accurate: Klaus Jakob predicted exactly how long the subways and infrastructure in New York and New Jersey would be inoperable. Jakob made these accurate predictions in writing, five full years before SuperStorm Sandy caused the damage Jakob predicted. It also gives us a view of the future in which wildfires could ignite our power facilities, or be ignited by power lines or other utility infrastructure, as happened in California in November of 2018. ***Think*** *what will happen to the LNG facilities, pipelines, and sky when a wildfire roars through the dry coastal dunes, from the upland lomas and burning brush, after another multi-year drought:* ***huge VCEs.***

As if this were not unacceptable in the extreme, we now have seen the risk presented by the large new rockets of the SpaceX facility located within ten miles of the proposed LNG plants. During wind storms of the 23rd of January, 2019, a new rocket was blown down, causing extensive damage and costly reparations. Though it is unlikely SpaceX would launch in such weather, wind patterns will become more extreme, hard to predict, and damaging as climate change worsens, since the atmosphere becomes unstable, and has violent responses to carrying such a heavy load of Greenhouse Gases. We cannot rule out the likelihood that SpaceX rockets will be blown off course in unpredicted, arbitrary winds, and that the pool of Methane above these LNG sites will also be blown into the path of the rockets launching with live rocket fuel. Again, a major VCE is predictable, with a far higher probability than has been assumed. IND09-12

IND09-12 DOT FAA regulations cover safety of SpaceX launches and consider wind conditions. In addition, the risk of a rocket launch failure resulting in releases from the Project site that could impact the public is extremely low given the low likelihood of debris that would result in large releases and the distance between the public and the Project site. For debris to impact the Project site, the direction of wind that would cause a failure at the Project site would be in opposite direction from the public.

B. New Storm Data After Hurricanes Harvey, Irma, Florence, etc: IND09-13

In *APPENDIX 13.1.3 ff.* of the DEIS, I see no persuasive, clear commitment to, or even a reasonable possibility to meet FERC requirements (cited below), given new storm surge facts from Hurricanes Harvey in Texas, Florence, and rising coastal water levels with climate change extremes, esp. more water in each storm event due to evaporation from warming oceans, more rainfall *(65-70 inches in Harvey, https://www.nhc.noaa.gov/data/tcr/AL092017_Harvey.pdf)*. Harvey was a thousand year storm, formerly thought less probable than .01%. *The weather extremes resulting from Climate Change are accelerating: The U.S. has experienced at least 24 of these "500-year" rain events in the past 9 years. Previously "rare" events will become the norm as we continue to warm the atmosphere, since warmer air contains more moisture. This pattern is greatly worsened by more LNG facilities.*

The LNG Project will release the considerable heat generated by cooling the natural gas down to minus 260 degrees: according to specifications we have seen, into the ***air****, since releases into the* ***waters*** *of the recently restored Bahia Grande area will kill most fragile, healthy organisms. But even releases into the* ***air*** *above the LNG facility, which is what is proposed, would eventually warm the Gulf waters and those of the fragile Bahia Grande within a month or so, given the fact that warmer air holds moisture, which will then fall back down as rain. The warm rains raise the humidity, rather than cooling the land below.*

Please See Reports From These Newer Sources, Links for which are provided BELOW:
https://www.paddouglasweather.com/atmospheric-afterthought-here-houston-was-25th-500-year-flood-across-usa-since-2010/
and https://pubs.usgs.gov/of/2018/1172/ofr20181172.pdf

Building LNG terminals in the Port of Brownsville would lead to a tremendous increase in fracking in the Eagle Ford Shale region, with devastating consequences. Already, rural south Texas is being transformed into an industrial zone. With today's attack on the Clean Water Act, we become vulnerable to the kinds of toxic emissions into drinking water supplies which industrial Corpus Christi experience often, e.g., in the 2017 Christmas season. IND09-14

Scarce Texas water resources are being depleted, and in some instances permanently contaminated. The pollution associated with fracking is making people sick, increasing health care and insurance costs for all employers and the insurance plans.(7)

1 "Guidance on Risk Analysis and Safety Implications of a Large Liquefaction Natural Gas (LNG) Spill Over Water." Sandia National Laboratories, Dec 2004.

IND09-13 The proposed facility is designed to withstand a sustained wind speed of 150 mph (183 mph 3-second sustained wind speed) which has an approximately 30,500 year mean return interval and would be designed to manage wave overtopping from a 500 year storm surge.

The equivalent return period for a storm event is specific to the spot or area where the storm hit and should not be compared to the total number of 500-year events that occur across the country. Hurricane Harvey caused 1000-year precipitation and flooding in various areas of Texas; however, it made landfall 170 miles north of Brownsville. Other recent hurricanes such as Hurricanes Florence, Irma, and Maria impacted the eastern coast of the United States.

Furthermore, the 65 to 70 inches of rainfall from Hurricane Harvey which caused 1000-year floods in some places was the maximum observed rainfall in an isolated area where the eye of the storm had hit (with the most intense rainfall). The NOAA document in the comment also provides a figure that shows total rainfalls drops significantly just 25 miles outside of where the eye made landfall and the vast majority of coastal Texas affected by Harvey experienced between 1 and 25 inches of rain.

IND09-14 See our response to comment CO10-81. Section 1.3 of the final EIS has been updated to clarify that production, extraction, and end-use of natural gas are not part of the proposed action evaluated in the EIS.

2 Ted Sikinger. "Gas explosion at LNG facility in Washington prompts concerns about proposed export terminals in Oregon." *The Oregonian*, 1 Apr 2014.

3 Kristi Pihl, "Evacuation Area Near Plant to Be Reduced." *Try-City Herald*. 31 March 2014.

4"Liquefied Natural Gas (LNG) Import Terminals: Siting, Safety and Regulation." Congressional Research Service, 27 May 2004.

5 "Texas LNG Overview Greenfield Barge-based LNG Liquefaction & Export Project" Slideshow.txlng.com. Dec 2013.

6 U.S. Energy Information Agency, "Effect of Increased Natural Gas Exports on Domestic Energy Markets," Jan 2012. http://www.eia.gov/analysis/requests/fe/pdf/fe_lng.pdf

7 Jim Morris, Lisa Song, and David Hasemyer, "Big Oil and Bad Air: Fracking the Eagle Ford Shale of South Texas," Center for Public Integrity and the Weather Channel, 18 Feb 2014.

For a very clear map showing the areas to be impacted, beyond the good maps shown in the DEIS, see the green (vs. yellow) areas in: http://www.savergyfromlng.com/ where. There are 12 fragile upland lomas in this region. Three of the finest are within the ANNOVA proposed site, and absolutely no mitigation has been proposed for these. IND09-14

Though there are numerous agencies, including the Army Corps of Engineers, cooperating to review these projects, *the official FERC Guidance Manual* states the basic duties and principles applying to applicants: IND09-15

_____ *Inserted from Guidance Manual): (Extended Quote)*_____

Applicants to FERC for LNG projects must do the following, (but have not):

... Describe the design storm surge elevations for the project site and their basis for both still water and with wind/wave effects conditions considering site-specific studies. Include all project elevations for dikes, storm surge walls, piers, docks, unloading and loading arms and other pier and dock facilities, and other elevated features of the project, their design basis, and demonstrate how they will conform to industry and Federal standards and protect critical equipment or ensure minimal consequences. Include the historical or scientific basis for wind and storm surge conditions used as design criteria. Compare with 100- and 500-, 1,000-, and 10,000-year return period elevations and NOAA storm surge elevations for hurricane prone areas at the site for Category 1, 2, 3, 4 and 5 hurricanes. Include in these elevations the effects of sea level rise and regional subsidence considering the design life of the facilities for time dependent severe natural hazards.

13.1.3.1 Wind and storm surge design basis and criteria

13.1.3.2 Identification of design wind speeds (sustained and 3-second gusts) and corresponding return periods, wind importance factors, and storm surge design elevations for all structures, systems, and components

IND09-14a Potential impacts on lomas are described in several locations in the EIS, and the discussion of lomas in the final EIS has also been updated in response to comments on the draft EIS. With regard to mitigation for impacts on lomas, see response to comments CO10-57 and CP10-58.

IND09-15 As stated in section 1 of the FERC Guidance Manual for Environmental Report Preparation, the Guidance Manual is not a mandatory document. Furthermore, the return period does not correspond to the number of storms across the U.S or a region, but to a focused and refined area. For example, the 10,000 year return periods from NUREG/CR 4461 are used to evaluate tornado effects for an areas defined by 2 degrees in latitude and longitude (approximately 139.4 miles by 139.4 miles or 19,044 square miles). Also see response to comment IND09-013.

13.1.3.3 Comparison of design wind speeds (sustained and 3-second gusts) and storm surge (still water, wind/wave run-up effects, crest elevations) with hurricane and other meteorological event wind speeds corresponding to:

13.1.3.3.1 10,000 year return period
13.1.3.3.2 1,000 year return period
13.1.3.3.3 500-year return period
13.1.3.3.4 100-year return period

(End of citation from FERC Guidance Handbook)

Note that these time periods for return events are now out of date since Hurricanes Michael, Harvey, Irma, Maria and Florence, and since the global data on storms within the past decade includes a much higher probability of 500-year storms. Higher storms surges are now so much more probable that insurance companies and local governments are changing what is acceptable in construction for the future, —not even allowing some to rebuild in such areas. Storms are longer and bring more water due to hotter oceans and air. We have experienced 26 (twenty-six!) 500-year storms within the past eight or nine years, since 2010. This is being written at the start of 2019.

So this Environmental Review should at least have included a revisiting of the specific site elevations given the new post-2017 storm surge data (NOAA). **Failure to include this data is unacceptable and renders the project proposals ineligible for a FERC permit according to FERC's own guidelines quoted above.** IND09-15

Summary: **The public safety and security risks presented by LNG facilities and pressurized pipelines, compressors, etc. include dangers from VCEs, from wildfires in drought years, as well as power outages from increasingly intense storms, storm surges, and temperature extremes. These involve major explosions with blast ranges covering several miles in diameter. The proposed ANNOVA LNG site is located a mere six (6!) miles from Space X, with its live rocket fuel launches and their projected paths, directly under the likely range in which the flammable gases will pool above both the LNG liquefaction and the loading facilities. Studies are flawed as they looked only at the buildings on the ground within the SpaceX blast range, not the far wider blast range of the pooled Methane which will have gradually accumulated above the LNG sites.** IND09-16

II. **Unsatisfactory Plan in DEIS to Mitigate Irreversible Environmental Harms to our Listed Species: Noise Levels and Incomplete Wildlife Corridor Threaten These Species** IND09-17

The 18 species which are federally listed will be seriously endangered by this ANNOVA project, especially Ocelot, Aplomado Falcon, and the extremely rare Jaguarundi. ANNOVA's proposal violates the "no net loss" federal policy, and will completely destroy the very rare and ecologically crucial upland lomas of this fragile, beautiful region: three of these lomas are within the ANNOVA site. Absolutely no mitigation for this destruction is planned! Instead, a false premise on page 5 of the DEIS is asserted, along with untruths on pp. 4-32.

IND09-16 The ACTA studies (see response to comment CO10-073) considered the entire Project site as well as specific areas within the Project site to determine potential cascading effects. Also see response to comment IND09-012 above. DOT PHMSA's LOD issued on March 20, 2019 evaluated the overpressure or blast wave effects due to an explosion of flammable vapor. Specifically, section 9.5 of the LOD analysis showed the overpressure hazards would remain within the Project's property line and could extend into the Brownsville Ship Channel.

IND09-17 Potential impacts on lomas are described in several locations in the EIS, and the discussion of lomas in the final EIS has also been updated in response to comments on the draft EIS. With regard to mitigation for impacts on lomas and their value as wildlife habitat, see response to comments CO10-57 and CP10-58.

Hundreds of pages of the DEIS are wasted on numerous **mentions** of "threatened" and "Endangered Species" and "critical habitat," but **no actual actions are proposed** to mitigate effects on our state and federally listed species; assuming falsely exactly the thing that needs proving, -e.g. "no critical habitat has been established;" and that someone else will be able to mitigate the significant cumulative impacts environmentally, both of which are demonstrably false. Indeed, effects are so great they would cost more to mitigate than the project will be worth in profits, if built, though the completed Wildlife Corridor would help many species. IND09-17 Cont'd

Wetlands and ***lomas*** are highly fragile zones, not evenly distributed around the country. Ours are unique, highly valued, and necessary for clearing up the waters and air crucial to the lives and health of humans, too. This is why the Bahia Grande at this site was restored (and this largest restoration project in the Northern Hemisphere was completed just in 2003), at great cost, to remove hazards like "dead fish dust" for the health of Brownsville residents as well as the health of the millions of organisms in these wetlands which purify the water, balance the system, cool the area, and provide food for many species. All living creatures are sensitive to loud sounds. Even what seem to be small impacts can harm such fragile balance irreversibly, also damaging eco-tourism and shrimping. But oyster beds and shrimp breeding grounds cannot just be moved elsewhere. In spite of the need to deal with this last problem, one form of mitigation remains a possible key to permitting even just one of the 3 proposed LNG facilities: a Mega Mitigation Wildlife Corridor ($100 million worth.) IND09-18

Given the magnitude of the significant and irreversible environmental harms to the wetlands and upland lomas of the proposed LNG sites, the only possibly meaningful mitigation, if even one major project is approved and built, would be the completion of a Mega-Wildlife Corridor throughout the Rio Grande Valley, a project already begun but still needing extensive funding and support of organizations like the Army Corps to be effective. Friends of the Wildlife Corridor have long worked to make it a reality so that road kills and other human threats have less impact on our endangered and threatened species. Wildlife Corridor expansion, construction and enforcement would have to remove the many substantial and ecologically damaging sections of the Border Fence/Wall to protect habitats or create new ones where the useless Wall was, to offset such large scale losses of wetlands which the LNG construction would surely cause. A more effective "wall" indeed than those proposed by the Trump Administration would be a wall of native shrubs and plants, which, as one can see in Santa Ana NWR and other Valley habitats even at places along Rte. 100, have large painful prickers and thorns, cactus spines, and provide very human-proof cover for ocelot and other small mammals and birds who make this impenetrable native landscape their safe homes. Underbrush is far better a defense for ocelot and against androgenic harms than concrete and cleared territory of the planned "enforcement zones" of 150 feet on either side of the proposed new Wall segments, and a Wildlife Corridor would also cost far less than the appallingly costly Border Wall as most recently proposed. The segments of barbed wire recently installed by the military forces costing us 100 million dollars near the border would also have to be removed, in favor of thorny, prickly, spiny native cacti and brush such as could be planted during another set of Rio Reforestations. The Army Corps of Engineers has in its ranks now several leaders who have obtained certification in our Texas Master Naturalist Program (through TX A&M Agri-Life Extension services and staff) and who would be qualified to

IND09-18 See response to comment ING09-17.

work with the environmental inspectors and auditors to enlist volunteer labor to assist with the reforestation with native barriers at the border, providing not only the barrier to illegal immigration, but also the completed Wildlife Corridor which would mitigate the extensive and irreparable harms to habitats from LNG and pipeline sites. Mitigation requires new wetlands to be purchased or restored. IND09-18 Cont'd

The DEIS recommended "additional mitigation related to nest identification, monitoring, and implementation of best management practices for the Northern Aplomado Falcon." These habitats are not a zoo, where animals can just be "managed." This vague recommendation is unsatisfactory, insufficient, and would be fruitless without an expanded Wildlife Corridor including new sections for wildlife to expand into. And another factor is glossed over and understated: the **noise levels** noted in the DEIS have no adequate mitigation proposed. re: Endangered Kemps Ridley Sea Turtles, it is simply false that "No critical habitat has been designated for this species,…" as those of us who have served on Turtle Patrol on S. Padre Island beaches, and who have visited the Padre Island National Seashore nesting sites know. The LNG and Pipeline will "adversely affect the Northern Aplomado Falcon, the Piping Plover (and its critical habitat), and the Ocelot," as the DEIS states, but no mitigation plan in the DEIS is adequate, or even a reasonable attempt, since there is none of adequate scale possible given the nature of these LNG projects. Best practice here is **not to build** at all. IND09-19

Wildlife refuges and wetlands are not zoos, or packages we can just "relocate." This is their habitat. We humans can go elsewhere, or even change our minds about how we generate power. Only a Wildlife Corridor would help. But this Mitigation Wildlife Corridor would not be just any old partial or fragmented, non-continuous Wildlife Corridor: it must be enhanced, parts restored, widened, and most importantly, completed, so that the listed species of wildlife can survive moving around in their habitats without the instant death and looming extinction that comes from roadkills.

Perhaps these LNG developers plan to redefine what a "wetlands" is by falsely maintaining that they do not count unless they are never "dry". This false premise that an area is only a wetlands and thus protected if the area is wet 365 days a year, (which is never the case with actual wetlands) was tried by the first Bush Administration, resulting in much ecological damage and human suffering, when the wetlands which were built upon flooded badly later on. As climate extremes bring more water in rain in each major storm event, alternating with years on end of drought, much soil and biomass is being lost when wetlands are disturbed, like those near New Orleans, unlike our vast lagunas in the Laguna Atascosa WR, which are dry for long periods, and only for that reason can handle major influxes of storm water. When wetlands which are sometimes necessarily dry are built upon, major flooding results. Those risking construction on such sites regret having built or lived there. IND09- 20

The INGAA Foundation's ***Construction Safety Consensus Guidelines*** (3.3.1) remind us that managing projects like LNG liquefaction requires: Management and any supervisory bodies (being) responsible for empowering: "…all personnel with the authority to "Stop Work whenever hazardous conditions or potentially hazardous conditions are identified." In a supervisory and evaluative role, FERC is also responsible to avoid costly, often fatal impacts of such projects, if not with "Stop Work" orders (always likely to impact contractor scheduling and thus increase costs by delaying construction deadlines), then with a duty to IND09- 21

IND09-19 See response to comment IND09-17.

IND09-20 As described in section 4.4.1 of the EIS, the wetlands within the Project site were identified in accordance with the COE Wetland Delineation Manual and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region, and classified according to the Classification of Wetlands and Deepwater Habitats in the United States (Cowardin et al. 1979).

IND09-21 A standard condition contained in all FERC authorizations, and recommended here, provides delegated authority to the Director of OEP, or the Director's designee, to take whatever steps are necessary to ensure the protection of life, health, property, and the environment during construction and operation of the terminal. This authority includes stop-work authority and authority to cease operation. Annova proposes to implement the FERC's Wetland and Waterbody Construction and Mitigation Procedures, as modified for the Project-specific site, which we call in the EIS Annova's Procedures. See section 2.5 and appendix B of the EIS. As indicated in the section 4.4 of the EIS, only about one-third of the site contains wetlands.

"Stop the Project" as a whole, or to exercise its power to deny a permit to the LNG Projects before incurring unmanageable costs and liabilities. In the May 2013 version of the ***FERC Wetlands and Water Body Construction and Mitigation Procedures***, we find the following example of a crucial preventive measure, which seems impossible in our specific site for this LNG liquefaction facility: **"Install sediment barriers; and Relocate hydrostatic test manifolds outside wetlands to the maximum extent practicable."** It follows that if the coastal wetlands site is as extensive as this project requires, such mitigation as locating the hydrostatic test manifolds outside the wetlands is impossible. Even so we need the Corridor. IND09-21 Cont'd

The construction and purchase of remaining lands in the existing Corridor, of an extended Wildlife Corridor throughout the Lower Rio Grande Valley, would be the only meaningful mitigation possible to protect the more than 24 threatened and endangered species at risk here. This region has for more than 15 years had "Rio Reforestation" events where hundreds of school buses and vans bring volunteers to replant the region with native trees, plants, and shrubs, to host our many rare birds, butterflies, insects, dragonflies, damselflies, reptiles and mammals. We have already constructed some parts of the Wildlife Corridor, though many road kills of those few remaining ocelot still occur, to the point that even Laguna Atascosa National Wildlife Refuge and Santa Ana NWR have closed their bicycle and van tour roads formerly open to the public, to prevent ocelot kills, in recent years the major cause of death of this seriously endangered species. The Corridor would also need to pass over, overcome, bridge, or tunnel under (as is already being constructed) (preferably **over**) numerous roads, like Rtes.100 & 48, Port Isabel to So. Padre Island, Los Fresnos and San Benito, in part of this large, unique and rare wetlands and upland loma habitat set. The Border Fence (Wall) sections of land also served as crucial habitat, and the 150 foot "enforcement zones" of cleared former habitat, if more wall segments are built, would need to be converted into wildlife corridor, and portions of the wall through sensitive habitats **removed** in favor of drones, scrub, cacti, and other tools of the Border Patrol in effectively patrolling the Border. IND09-22

A major given premise here is the well-documented presence of numerous federally and state-listed species of highest concern in these fragile marine and coastal habitats, already recognized: The Ocelot, Aplomado Falcon, Kemps-Ridley Sea Turtle, plant species listed on the NEPA site, and the fragile breeding grounds in the small remaining areas of Black Mangrove swamps along Route 48 just across from another proposed LNG construction site, for shrimp and Brown Pelican. The latter were saved once already from near extinction by the public outcry generated by Rachel Carson's *Silent Spring* and widespread scientific reporting 50 years ago, based on scientific studies of effects of DDT on bird egg formation. Now, coral reefs and all sea animals with shells are threatened by the massive increase in Carbonic Acid in the oceans/Gulf, from our CO_2. Even the Wildlife Corridor won't help ocean pollution.

There is no possible mitigation for this project's impact, except perhaps a huge ($100 million dollar) completed (continuous, even under or over the many roads and railroads in the whole Lower Rio Grande Valley) Wildlife Corridor. Preventing irreparable harm is FERC's role. The Commissioners are liable, if you knowingly put us all at risk.

Summary: Unsatisfactory/Irreversible Environmental Harms to our Listed Species; Mitigation Would Be Either Impossible or Far Too Costly, Outside of a Mega-Corridor. IND09- 23

IND09-22 See response to comments CO10-57 and CP10-58.

IND09-23 See response to comments CO10-57 and CP10-58.

III. Process Inadequate and Outdated; for Assessing Risks and Cost-Benefit Ratio; IND09-24

Outline of Points:

The Rio Grande Valley has a long term Green Infrastructure Plan Already;

The Trade Tariff War makes the LNG product too expensive for the Chinese to import, and for domestic sale;

Obsolescence of fracked gas fed LNG Production; Market forces now favor renewables and leaving oil in ground. For work already underway toward a greener, more cost-effective future for the Valley, see: https://nca2018.globalchange.gov/downloads/NCA4_Report-in-Brief.pdf

Summary: The Carbon Footprint of this project is immense, and unnecessary: it includes the pollution from fracked gas, and transport, —all contributors to the carbon and water footprints in the whole life cycle of LNG production & delivery. Increases in GHGs threaten the survival of our species as well as the threatened and endangered species listed. Its costs are not only related to habitat loss and survival. As recent reports of new research about energy show, LNG rates very low in its cost-effectiveness, way below industrial scale wind and solar. LNG is no longer a competitive "transitional fuel," as industrial wind and solar are many times less costly.

Each of the proposed LNG projects, and most of all this ANNOVA project, has very high carbon and water footprints, not to mention the impacts of the construction process, which will increase androgenic warming significantly, worsening the already oppressive heat and humidity in the Valley at least 6 months of the year, and also worsening the severity of storms which carry the evaporated water vapor. This will produce more extreme weather and flooding, as we've seen. As for the claim that burning the "transitional fuel" Natural Gas has less impact than oil, or "burns clean," it is ***false***: the fracking of the source gas, the whole transport process in tankers and pipeline, and releases of methane into the atmosphere make its atmospheric effect far worse! Methane traps heat 33 times worse than CO_2. We are already mostly past the tipping point of irreversible and catastrophic feedback loops of planetary warming. Even if this were "denied," LNG is also no longer profitable. Even Nancy Pelosi was ***misinformed*** when claiming that LNG produces "50% less CO_2 than fossil fuels," since of course LNG *is* a fossil fuel, and its production greatly worsens global climate change. In the form of these LNG projects, the LNG has a large carbon footprint in its whole "life cycle." IND09-25

Given that LNG production costs are high even in the fossil fuel industry, and that most of us have energy stocks in our retirement mutual fund investments, FERC has a duty to prevent dangerously bad risks to investments. More viable, less problematic energy alternatives exist even right here in Texas, already a world leader in wind energy, with great potential in distributed load using solar arrays and other renewables. The 3 proposed LNG projects to be located in this extremely fragile marine area and coastal bioregion all are surely completely unacceptable in terms of highly significant, lasting, irreparable environmental damage and public safety risks of unimaginable scope. For this latter reason, the uniformed IND09-26 IND09- 27

IND09-24 Greenhouse gases and climate change are addressed in section 4.13.3.9 of the EIS. See also response to IND9-14.

IND09-25 Greenhouse gases and climate change are addressed in section 4.13.3.9 of the EIS. See also response to IND9-14.

IND09-26 Project cost, or risks to Project investors, is beyond the scope of the EIS.

IND09-27 Cumulative impacts, including from construction of the 3 proposed LNG projects, is addressed in section 4.13 of the EIS.

services (police and firefighters) joined our early efforts to stop these projects. Surely the scrapping of one of the original four projects proposed, and the pull-out of the French banks formerly funding LNG here in Texas, testifies to this complete failure of the LNG projects and pipeline to meet even the most basic FERC requirements, without even considering the next key issue covered in the Guidance Manual viz., Vapor Cloud Explosions (VCE), which would completely shut down and destroy not only the LNG Facilities, but also the eco-tourism industry, plus major shrimping and other fishing and marine breeding capacity of the whole Lower Rio Grande Valley's coastal region. Recent explosions in the whole sky above a Chinese port city where LNG had been offloaded from tanker ships show how significant the pooling of Methane and VCEs are. They justify the continuing withdrawal of investor support for LNG projects, as we see for example in the lower stock price of NextDecade, a parent LNG corporation, down to one third of its original value as of this writing. VCEs are deadly. IND09-28

Further, the very fracking that generates the feedgas, natural gas to be cooled to minus 260 degrees F. in an extremely heat-producing process, here in our already overheated region, and the transport of gas in pressurized pipelines, are likely to generate more earthquakes, and thus may generate highly unpredictable tsunamis which will inundate and undermine energy facilities on our Gulf Coast. The costs of LNG production make it a poor risk financially, and a long-lasting eyesore and species destroyer in a fragile location. The feasibility of this obsolete form of fossil fuel energy is highly limited. Not only stockholders, but bankers worldwide are refocusing on renewables over LNG: banks are now required to include energy, society, and governance concerns. French bank Societe Generale already pulled out its support of LNG here, and since the tariff war has started, U.S. exports are now being taxed by other nations, e.g. China, and Mexico, countries which our Administration has offended. Russia and China already have other gas suppliers, e.g., Qatargas. Just this fall, the Chinese tariffs on LNG were raised to 10%, which is well known in September's business reports, e.g.: https://www.ogj.com/articles/2018/09/china-imposes-10-tariff-on-us-lng.html, soon >25%. IND09-29 IND09- 30

We entrust our energy agencies to create and enforce policies which protect the public safety, and balance projected energy needs against mere profiteering at public expense, and short term private gain which ineluctably leaves unusable hulks littering the seascape, increased asthma in young and old, and irreversible pollution of our natural resources. Seeing California burning from prolonged drought and documented rises in temperatures, we now understand that the extremes of Climate Change are upon us already. As the nation's trustees for energy policy and public safety, you as Commissioners, to be credible and authentic as a body, must sometimes cancel and refuse to permit projects of great risk and such significant harm. The net Carbon Footprint of the LNG project in its whole life cycle is far larger than that of the alternatives: energy conservation, wind, solar, and other renewable energy projects underway. Since the expensive LNG will be sold abroad, rather than raising the prices of natural gas here in the US, LNG producers intend to transport the LNG to assumed Chinese markets in super-tankers. Dangers are possible leaks underway, and the simple scientific fact that Methane is lighter than other components of air: thus, it traps in heat from above them, at IND09-31

IND09-28 The incident at the Chinese port in August 2015 did not involve an LNG facility nor did it result in any known cascading consequence at the nearby LNG facility. VCEs are further discussed in response the comment IND09-010. Section 4.12.5.7 of the EIS addresses launch failures from the SpaceX launch site.

IND09-29 See response to comment IND9-14.

IND09-30 Project cost, or risks to Project investors, is beyond the scope of the EIS.

IND09-31 The Commission will consider the analysis in this EIS, including comments such as this one, as part of its determination of whether or not to authorize the Project. With regard to construction of a wildlife corridor for mitigation, see response to comment CO10-58.

factors many times worse than even CO_2 traps heat. FERC's very existence depends on its efficacy in doing its duty to the common good. I strongly urge you, Commissioners, to deny the permit for this LNG project, and to encourage the far less costly and less damaging, safe alternatives in renewable energy here in Texas. Do not permit even one tiny LNG project here, and/or: construct a continuous, complete Wildlife Corridor of massive proportions. IND09-31 cont'd

In this new era of climate change extremes, efficiency and cost-effectiveness are all the more necessary. Industrial scale wind and solar energy are even now already definitively shown to be more efficient by far than LNG and other fossil fuel energy types, as Dan Gearino has concisely shown in his reporting of studies in the ***Clean Economy Weekly***, **https://insideclimatenews.org/campaign-archive/clean-economy-weekly** IND09-32

"Pro-LNG" hand-written notes, all submitted in a single 1.5 hour period, were written without reference to any specific issues, like which species are threatened, and what their habitat requirements are. They are obviously the result of the activities, perhaps a dinner meeting gathering those who would parrot their vague support of LNG, organized by STEER, a partisan, biased, pro-oil group set up to "steer" the ignorant into supporting LNG projects. See https://www.bizjournals.com/sanantonio/news/2018/05/31/oil-and-gas-industry-funded-group-to-expand-in-the.html, and note the timing of the advent of STEER to the Rio Grande Valley. Other statements of support are shallow, not based on actual facts about the environmental and security risks, and misleading regarding the number of jobs to be "created." Full time permanent jobs will total under 100 people, according to our studies, and the records of other LNG facilities we have studied. So after irreversible damage to our ecological infrastructure, —roads over wetlands, wildlife habitat permanently disrupted, noise levels continuing to drive living things away and ruin the hearing of humans in the area, — we will be left with useless hulks of concrete, steel, and toxic substances, mostly under water. In the end, a net loss of jobs results from such ruins, and from destruction of lovely eco-systems and habitats, formerly bringing hundreds of millions of eco-tourism dollars annually.

IV. **Air Pollution:**

IND09-33

The ANNOVA facility would release dangerous chemicals into the air, to be carried by prevailing winds up to Laguna Vista, Rio Hondo, Bayview, and Harlingen, as well as further north to depressed Willacy County where agriculture will be affected. The chemicals include: carbon monoxide, hazardous air pollutants, nitrogen oxides, volatile organic compounds (VOCs), particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, and sulfuric acid mist.

This project, if built, would probably provide a few more health sector jobs in cancer treatment, asthma management, and economic hardship due to the collapse of the eco-tourism movement are likely to result from the large explosion risks, may well result from the LNG projects. But "thousands of jobs?!" More likely: 31 permanent jobs. Indeed, when the media explore the misguided economic "incentives" exchanged between the oil and gas industry and IND09-34

IND09-32 As stated in section 3.1 of the EIS, wind and solar energy cannot meet the purpose for the Project and are not considered or evaluated further in the EIS. All comments on the project, including comments in support, are considered in our EIS.

IND09-33 The potential impacts on air quality from the Project are addressed in section 4.11.1 of the EIS.

IND09-34 The potential impacts on the socioeconomics of the surrounding communities from the Project are addressed in section 4.9 of the EIS. Section 4.9 of the final EIS has also been revised to include additional analysis of the potential impact on the local shrimp industry. As stated in section 4.5.1.4 of the EIS, the Annova Project would not remove any mangrove habitat.

elected officials, many careers and livelihoods at the public expense may end. Indeed, several local school districts, towns, and cities near the proposed LNG sites have refused to participate in these economic incentives and tax abatements to "lure" oil and gas industry proposals by those already awash in extra cash. Oil and gas industry profits are at an all time high, while most of us, viz., middle class Americans, struggle to pay taxes and other bills. The Port of Brownsville obviously supports LNG because their letter shows no mention or consideration at all of environmental and eco-tourism's healthy and needed benefit to our region economically: thousands of eco-tourism jobs and **$430 million** in ***annual*** income to the Valley from eco-tourists. The shrimp and fishing industries are crucial economic drivers for the Port. But these are also not mentioned, nor the devastating effects the LNG tankers will have on the shrimping, plus the removal of the Black Mangrove swamps needed for breeding, and toxins entering the waters here. IND09-34

As a former professor of Ethics, Business Ethics, Environmental Ethics, Bio-Medical Ethics, and Engineering Ethics, as well as a Fellow of the Center for Women in Government and Civil Society of the Rockefeller Institute of Public Affairs, University at Albany, I have many concerns about whether our elected and appointed local public servants and FERC Commissioners have been given false "data" and incentives toward making them more "sympathetic" to these unacceptable LNG Proposals. Letters now in the public record supposedly "supporting" LNG now show absolutely no concern with environmental damage and global climate impact, but shortsightedly mention mere business motives for wanting LNG here. But business must have drinkable water and healthy employees, with breathable air, to function. Paying huge fines, and damages for predicted explosions will be financially disastrous. Damages will likely be highly punitive, given that FERC was warned. IND09-35

I would be happy to answer any questions about empirical premises used in the above reasoning and arguments against the permitting of the Texas LNG project. Please carefully weigh my comments and my quotations from FERC's own documents and *raison d'être*. The very existence of the FERC and our energy industries depends on rational decision-making, using good logic and good facts which are scientifically documented. Thank you for your time and attention to good logic, which must support your choices for the common good and the benefit of the whole eco-system, not of a few self-interested parties. I strongly urge you to **reprioritize our energy production** in favor of much more affordable, safe, and profitable fish and shrimp, wind, solar, and tidal energy sources. These will not release GHGs and heat.

It is your duty, regardless of the greedy demands for very uncertain short-term profits, to deny the permit for the ANNOVA LNG project, for all the reasons detailed here. If you are truly the public servants you purport to be, please prove it by doing your public duty and denying these LNG permits. You will be hailed as heroes who put the common and environmental good above private profits for a dangerous few who have unduly influenced you and others. Earn our trust. If you do not deny these LNG permits, you will be liable for the catastrophic damages predicted: the disastrous VCEs and vast irreversible destruction.

IND09-35 Thank you for your comment.

Respectfully and hopefully (for denial of ANNOVA's proposal), submitted,

Dr. Sarah Stueber Bishop Merrill, M.S., Ph.D. drsarahbishopmerrill@ICloud.net

20190129-0034 FERC PDF (Unofficial) 01/29/2019

ORIGINAL

FEDERAL ENERGY REGULATORY COMMISSION COMMENT FORM

ANNOVA LNG BROWNSVILLE PROJECT (DOCKET NO. CP16-480-000)

Comments can be: (1) left with a FERC representative tonight; (2) mailed to the address below or (3) electronically filed[1].

Please send one copy referenced to Docket No. CP16-480-000 to the address below.

For Official Filing:

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

2019 JAN 25 P 3:20

COMMENTS: (PLEASE PRINT) [*continue on back or attach an additional sheet if necessary*]

The Annova LNG liquefaction export facility has been extremely problematic from its inception, particularly with respect to environmental destruction. It is targeted for placement in a pristine ecosystem of rare lomas that have hosted a unique array of native plants for centuries, including the endangered Lily de las Lomas, and have provided a habitat for ocelots and other terrestrial and avian wildlife that are on the endangered Species List. So, damage to wildlife and native vegetation in this vulnerable location portends an irreversible loss of the remaining small percentage of pristine natural habitat on the Texas coastal tip.

It's essentially a tragedy-to-nature in the making.

Do not permit!

IND10-1

Commentor's Name and Mailing Address (*Please Print*)

Joyce Hamilton
1047 Sunnyside Dr.
Harlingen
TX 78552

[1] The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at http://www.ferc.gov under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account". The Commission has staff available to assist you if needed at (866) 208-3676 or FercOnlineSupport@ferc.gov.

IND10 Joyce Hamilton, page 1 of 1

IND10-1 Thank you for your comment. See our assessment of potential Project impacts on vegetation, lomas, and wildlife in the respective sections of the EIS.

ORIGINAL

LETTER OF SUPPORT FOR Annova LNG

January 18, 2019

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

Dear Secretary Bose:

I am writing this letter in support of the Annova LNG project at the Port of Brownsville in Brownsville, Texas that was issued on December 14, 2018 by FERC for Docket No. CP16-480-000.

After a careful review of the matter, I have found that Texas has an abundant supply of natural gas, and Annova LNG can help the State of Texas export LNG safely and efficiently. Annova LNG's proactive environmental mitigation efforts – including the use of electric driven motors to reduce air emissions – are commendable. IND11-1 IND11-2

I have seen that Annova has collaboratively worked with a multitude of Brownsville's local community leaders, it's citizens, various local and federal stakeholders. IND11-3

Additionally, the firm Annova LNG has modified its layout to create a 185-acre environmental conservation corridor and avoid impacting over 100 acres of wetlands. The project also proposes to restore and enhance over 250 acres of wetlands and shallow water habitat. These proposed efforts would restore tidal exchange and estuarine habitat lost when the Brownsville Ship Channel and State Highway 48 were constructed and supplement ongoing efforts to restore critical estuarine habitat in the area. IND11-4

The Annova LNG project is expected to create 700 construction jobs and 165 high-paying permanent jobs. IND11-5

For these reasons, I support the Annova LNG project and urge FERC to issue its Final Environmental Impact Statement according its schedule.

Please reach me at [956-455-2588] so we can move forward. I look forward to supporting you. Thank you.

IND11 Individual, page 1 of 1

IND11-1 Thank you for your comment

IND11-2 Thank you for your comment

IND11-3 Thank you for your comment

IND11-4 Thank you for your comment

IND11-5 Thank you for your comment

Brian Schill, Spring Branch, TX.
The idea of an LNG facility anywhere is dangerous to an extreme degree. This is even more significant in areas near shipping, human populations, and natural flora and fauna, due to the prospect of explosions. The intended area for this project fits all those criteria, it is fair to say. This explosion potential exists for both the facility itself as well as ships carrying the product and pipelines bringing it into the facility. IND12-1
Any of these would also constitute a tempting target for terrorist organizations, to inflict harm or extract payment from the commercial entity operating the facility, or from governmental bodies.
And even if the above were not a factor, global climate change is still a highly compelling reason NOT to allow this LNG facility to be built. IND12-2
Though we have known of this danger for at least 4 decades, industry and government have pushed back preventive action in changing over to renewable, non-carbon sources of energy, and phasing out the use of fossil fuels like oil, LNG, gasoline and coal. There is simply no excuse for continuing to develop sources of fossil fuels.
Why commit enormous amounts of investment money in a technology that is proven dangerous? To do so would be morally bankrupt, and a foolish long-term strategy for business. The world's nations have committed to reducing their carbon output, and we cannot ignore that commitment. IND12-3
Sincerely,
Brian Schill
1760 Spring Branch Rd.
Spring Branch TX 78070

IND12 Brian Schill, page 1 of 1

IND12-1 Sections 2.8, 4.12.1, 4.12.3, and 4.12.4 of the EIS address security of LNG vessels and the LNG facility. The security requirements for the proposed Project are governed by 33 CFR 105, 33 CFR 127, and 49 CFR 193, Subpart J – Security. 33 CFR 105, as authorized by the Maritime Transportation Security Act, requires all terminal owners and operators to submit a Facility Security Assessment and a Facility Security Plan to the Coast Guard for review and approval before commencement of operations of the proposed project facilities. Annova LNG would also be required to control and restrict access, patrol and monitor the plant, detect unauthorized access, and respond to security threats or breaches under 33 CFR 105.

IND12-2 Climate change is addressed in section 4.13.3.9 of the EIS.

IND12-3 Project cost, or risks to Project investors, is beyond the scope of the EIS.

Valley Crossing Pipeline CP17-19-000
Texas LNG CP16-116-000
Annova LNG CP16-480-000

A couple of simple but urgent questions for Valley Crossing Pipeline, Texas LNG, and Annova LNG regarding Texas and Annova LNG's statements that they will be getting their feedgas from Valluey Crossing. IND13-1

Can Valley Crossing confirm that it will be providing feedgas to Texas and/or Annova LNG as both Texas and Annova claim? Given that on 01-09-2017 it stated it would not provide feedgas to any LNG operation.

Can Texas and or Annova provide concrete evidence that Valley Crossing will be providing their feedgas beyond their simple statements that they will be getting their feedgas from Valley Crossing? IND13-2

> In the 03-23-2018 document as cited below, Texas LNG says it's plans are "subject to execution of definitive agreements between Texas LNG and Valley Crossing Pipeline." Have these definitive agreements been finalized? If so, what are the publicly disclosable details of the agreements.

Texas LNG indicates that more compression, provided by a compressor station midway between the Aqua Dulce Hub and its Facility at the Port of Brownsville, will be necessary for it to receive the quantity of feedgas it will need from the Valley Crossing Pipeline.

Will Annova LNG also need additional compression in the Valley Crossing Pipeline to receive the quantity of feedgas it will need?

What will Valley Crossing Pipeline's Blast Zone radius be if its compression is increased to accommodate Texas and/or Annova LNG's feedgas needs? How will the compression be provided? IND13-3

Background:

Regarding Vally Crossing:

It seemed back in January 2017 that Valley crossing said it would not be providing any feedgas for any LNG operation (Valley Crossing's 01-09-2017 "Motion for Leave to Answer and Answer of Valley Crossing Pipeline, LLC under CP17-19," http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20170109-5340, pages 3 and 23).

> On page 3:
>
> The Valley Crossing System is not designed to be attached to any LNG facilities.
>
> On page 23:

IND13 Young, page 1 of 3

IND13-1 Because of this comment and other similar comments received on the draft EIS, on March 15, 2019, we requested that Annova respond to these concerns. In its response filed March 25, 2019 (see FERC docket accession number 20190325-5179), Annova acknowledged that an expansion and design changes to the Valley Crossing Pipeline system would be required to accommodate the natural gas supply required for the Annova LNG Project. Annova anticipates the design changes could include expansion of the Valley Crossing receipt header system and addition of approximately 150,000 hp of new compression. This information has been added to revised section 1.4.1 of the final EIS.

IND13-2 See response to comment IND13-1.

IND13-3 Potential expansion of the Valley Crossing Pipeline and related reliability and safety review is beyond the scope of this EIS.

D. The Border Crossing Project's Purpose and Need Is to Transport Gas to the International Boundary.

As discussed in Resource Report 1 in the Application, the purpose of the Border Crossing Project is to transport gas to the International Boundary.79 There, the gas will be received by a non-affiliated pipeline to provide fuel for natural gas-fired electric generation plants owned by the Comisión Federal de Electricidad ("CFE").80 Commenters nevertheless claim that the Project is intended to supply gas to LNG facilities including a planned Texas LNG export facility.81 These claims are incorrect as Valley Crossing specifically stated in the Application that the proposed Border Crossing Project does not include any LNG facilities or contemplate attachment to any future LNG facilities.82 Moreover, the Valley Crossing System as a whole is not designed to be attached to any LNG facilities.

79 Resource Report 1 at 1-1.
80 *Id.*
81 *See, e.g.*, Frontera Audubon Comment at 1; Young Comment at 6.
82 Application at 5.

Regarding Texas LNG:

Texas LNG, in Section 1.4 of its *Draft Environmental Impact Statement Volume I* (page 51)

The following non-jurisdictional actions were identified in association with the Project:

• construction of an intrastate natural gas pipeline from an interconnect with another intrastate natural gas pipeline (Valley Crossing Pipeline[VCP]) to the Project site;

Also see the US Army Corps of Engineers 11-01-2018 Full Public Notice page 3 at https://www.swg.usace.army.mil/Portals/26/docs/regulatory/PN%20Now/PN.201500175.pdf?ver=2018-11-01-132008-727

The applicant proposes to construct and operate a 10.2-mile-long, 30-inch-diameter pipeline that would provide natural gas to Texas LNG's proposed natural gas liquefaction, storage, and export facility (Terminal). The proposed underground pipeline would interconnect with the Valley Crossing Pipeline currently being constructed by Enbridge, Inc.

For more details on Texas LNG's proposed lateral and the need for an additional compressor station, see the 03-23-2018 document entitled "Texas LNG Brownsville LLC submits response to data request from U.S. Army Corps of Engineers under CP16-116," page 4 at http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20180323-5169:

The proposed Texas LNG Lateral consists of a 30-inch-diameter pipeline that is proposed to be interconnected to an expansion of Enbridge, Inc.'s Valley Crossing Pipeline1, subject to execution of definitive agreements between Texas LNG and Valley Crossing Pipeline for the expansion services on the pipeline. The Lateral will be

10.2 miles in length and originate just upstream of the compressor station associated with the Valley Crossing Pipeline Project. Figure 1 provides an overview of the Lateral route. The Lateral will be mostly collocated with the Valley Crossing Pipeline north of State Highway 48 and collocated with the Valley Crossing Pipeline and Rio Bravo Pipelines south of State Highway 48 within a 25-foot-wide permanent right-of-way for its entire length between the compressor station and the Texas LNG Terminal. The Lateral's planned point of interconnection would allow receipt of natural gas at the desired pressure for operation of the Texas LNG Terminal. The planned operating pressure within the Valley Crossing Pipeline between the compressor station and Texas LNG Terminal prohibits interconnecting with the Valley Crossing Pipeline closer to the proposed terminal.

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Christine G Rakestraw, Harlingen, TX.

These comments are being submitted by me on behalf of the Lower Rio Grande Valley Sail & Power Squadron. It is a 501(C)(3) organization and a subsidiary of the United States Power Squadrons-America's Boating Club®, the world's largest not-for-profit boating organization, teaching boating for over 100 years.

The comments will mainly address the impact of the Annova Project on boaters who enjoy using the waterways impacted by this project. Additionally, our concern is increased due to the cumulative impact created by the construction and operation of 3 LNG Projects in close proximity. IND14-1

Some areas of concern:

Delay Time:

Page 400: "The total estimated corresponding annual delay time for small vessels from the cumulative additional 467 inbound plus outboard LNG carrier trips range from 11 to 32% of daylight hours per year." 32% of daylight hours seems quite a bit of lost boating time.

"Moving Security Zone": IND14-2

Page 400: ..."moving security zone which could preclude the other vessels from transiting the waterway." As we understand it, the correct word should be "would", not "could". As we understand it, moving security zone means no other vessels allowed, shutting down the waterway to all others. Period.

Note: this and other such worded comments throughout seem to downplay the impact created by construction/operation of these projects.

Jaime J. Zapata Memorial Boat Ramp Fishing Pier and Kayak Launch Area: IND14-3

Page 201: "Accessed via Highway 48, the Jaime J. Zapata Memorial Boat Ramp Fishing Pier and Kayak Launch Area is located along a short channel connecting the BSC to San Martin Lake, approximately 1.5 miles west of the Project site (figure 4.8.4-1). Site facilities include a public boat ramp, two picnic pavilions, a lighted fishing pier, and a kayak launch ramp. The site offers fisherman, boaters, bird watchers, kayakers, and others easy access to San Martin Lake and the BSC". This is a very important facility to many people, many of whom are low income- Sounds like there will be a continued disruption for many years to come. Will this facility even survive or be 'enjoyable'?

South Bay: IND14-4

Page 432: "This cumulative impact would represent a substantial increase in the number of large and ocean-going vessels in the BSC, and small vessels and recreational boaters attempting to access South Bay and the BSC would likely experience delays, ranging from 11 to 32 percent during daylight hours per year."

No Section specifically on possible impacts to the Lower Laguna Madre:

The Lower Laguna Madre is a major fishing, boating and dolphin watch site. Yet this body of exceptional significance is not address in this draft EIS - other than to be mentioned a few times in conjunction with other topics. Note: the draft EIS doesn't acknowledge that this body of water, directly connected to the BSC, is unique and exceptional: "... is

IND14 Christin Rakestraw, page 1 of 2

IND14-1 Thank you for your comment.

IND14-2 The impact of the moving safety security zone on other vessels would depend on variables such as the distance and direction of travel relative to the LNG carrier. Therefore, the moving safety security zone would not shut down the waterway to all vessels in all cases.

IND14-3 The potential impact on users of the Jaime Zapata Memorial Boat Ramp is addressed in section 4.8.4.2 of the EIS under the heading Recreational Fishing.

IND14-4 Because the BSC crosses the Lower Laguna Madre in an open body of water, transit by LNG carriers, including the associated moving safety and security zone, would primarily affect other deep draft vessels that must stay within the navigation channel. There would be limited impact on small, shallow draft vessels that normally operate outside of the defined navigation channel. Section 4.8.4 of the final EIS has been revised to include additional discussion of recreational boat traffic within the Lower Laguna Madre.

the only hypersaline coastal lagoon on the North American continent and only one of five worldwide". (The Laguna Madre of Texas and Tamaulipas. Texas A & M University Press, College Station, 2002). IND14-4 Cont'd

We are also concerned with the impact on the quality of life and the quality of recreation in our area. As stated multiple time in the draft EIS, this area is a recreational wonderland of all sorts of activity, including just chillin' out. As is stated in the draft EIS, page 393, "The lands surrounding the Project site are largely undeveloped, providing a variety of dispersed outdoor recreational activities, including fishing and bird watching." On page 205,the terms rural, undeveloped and relatively natural are used. This would change with these 3 LNG projects. Page 396 states, "As multiple industrial facilities are constructed along the BSC and nearby the visual quality of the area would change from natural and partially developed to more industrial". Relax and chill don't mix well with 'industrial surroundings'. IND14-5

In addition to affecting locals, tourists come to our area, by-passing and traveling many additional miles, for a reason: they do not enjoy "recreation" in industrialized areas. If the sight (obvious), sound, air quality/smell ("Operation of the Project would result in permanent air quality impacts", page 428) of our garden spots reflect industry not nature, why should they bother to make the additional effort to get here?

It is impossible, however, to know the full impacts of this project and comment accordingly, due to the large volume of information that is yet to be addressed in the draft EIS: (specifics cut due to space limitation) Lighting Plan, wetland mitigation plan, migratory bird plan, CZMA compliance.... Page 429 is especially important - missing information on Since Space X. Launch Area is stated in the draft EIS to be 6.3 miles away, the control center 4.0 miles away, we would think that a more complete investigation of these 2 facilities, which are in such close proximity, would have been completed by now. IND14-6

We are also concerned about the large number of "recommendations" for mitigation, before, during construction/operation in the draft EIS. IND14-7

Pages 433-452: FERC STAFF'S RECOMMENDED MITIGATION - 20 pages worth, 124 recommendations, plus subdivisions. Note: there is no mitigation possible for boaters when a waterway is closed to them.

Pages 240-255 also lists 102 'recommendations'.

Are these "recommendations" required or just an option which can be ignored.

Lots more to find out .....

Respectfully cut short and submitted by a volunteer and 'non-professional'

Thank you.

IND14 continued, page 2 of 2

IND14-5 Comment noted. Potential impacts on recreation and tourism are addressed in sections 4.8 and 4.9 of the EIS.

IND14-6 It is standard practice for an EIS to be completed prior to the completion of all plans, and if a project is approved, for the Commission Order to include a condition that construction may not proceed until after all necessary plans and related agency consultations have been completed. This practice is also upheld by the courts (see Grapevine v FAA). The public will continue to have the opportunity to review and comment on filings as they are made with the Commission.

IND14-7 As stated in section 5.2 of the EIS, recommendations in the EIS are made by FERC staff who prepared the EIS, and if the Commission authorizes the Project, they are measures that FERC staff recommends be included as specific conditions in the Commission's Order.

Diane Teter, Edinburg, TX.

As a local RGV (Rio Grande Valley) biologist who studied and lived very near the Laguna Madre in the town of Laguna Vista, I am in strong opposition to the Annova LNG Export Terminal for the following reasons: IND15-1

1) Annova's mitigation plan is grossly inadequate. There is no mitigation plan whatsoever for the 3 lomas (409 acres) that will be mostly cleared, graded and built upon. Lomas are unique geologic and biologic formations of immense habitat and wildlife value. Annova's DEIS repeatedly dismisses or minimizes their immense value, and offers no mitigation. From a biological perspective this is criminal.

2) For the wetlands that will be destroyed (53 acres) Annova proposes to re-flood Little San Martin Lake by opening up an abandoned earthen levee, something that could be done by 2 people with a shovel. Also, this area is already under the protection of the U.S. Fish & Wildlife Service. That is not meaningful mitigation and is in no way commensurate with the wetland impacts Annova will cause. IND15-2

3) The wetlands mitigation plan as proposed will violate the "No Net Loss" federal policy. IND15-3

4) The DEIS states (p. ES-5) "…we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32) These are utterly false statements, as any biologist not in the employment of Annova will attest. Also, the plan to revegetate 53 acres after 4 years of construction is unrealistic. Lomas are densely vegetated, few in number, and can't be rebuilt or re-created. On page 4-48 it states "…we conclude that impacts on terrestrial wildlife and wildlife habitat would be minor." This conclusion is not supportable and we strongly disagree. IND15-4

5) Annova's vegetation survey of the Project site is inadequate. It states there are no species present from the Annotated County List of Rare Species (TPWD) which is not true. Also false is the statement that the Ebony Snake eyes vegetation community does not exist on the site. IND15-5

6) The "Facility Lighting Plan" has significant wildlife implications, and should be required by FERC as part of the EIS, not just done "before construction." Again, you leave the public out of the process. IND15-6

7) In return for agreeing to move the Project site slightly eastward, the USFWS agreed to surrender over 100 acres of Loma Ecological Preserve land. This formerly protected habitat needs to be mitigated. IND15-7

8) The DEIS states (p ES-5) "Sediment-laden water could be transported into the Bahia Grande and result in a potential for some increased turbidity and sedimentation effects near the channel entrance …" This is not acceptable for what was the largest wetland restoration in North America in 2005. Also, the DEIS erroneously states that the Bahia Grande was itself a mitigation site. It was not. There are extensive beds of seagrass upon which migratory fowl depend on feeding during migration. Also, these seagrass beds are a source of oxygen for the marine and land animals - which include us humans! IND15-8

9) Dredging impacts to South Bay need to be examined, particularly since the DEIS says "Cumulative impacts on surface water quality during operation would be permanent and moderate to significant…". Sea grasses and oyster beds can be affected by even mild dredge spoil deposition. IND15-9

IND15 Diane Teter, page 1 of 2

IND15-1 Potential impacts on lomas are described in several locations in the EIS, and the discussion of lomas in the final EIS has also been updated in response to comments on the draft EIS. With regard to mitigation for impacts on lomas, see response to comments CO10-57 and CP10-58.

IND15-2 See response to comment CO10-68.

IND15-3 See response to comment CO10-68.

IND15-4 See response to comment CO6-04.

IND15-5 We are not aware of evidence that specific vegetation types exist on the site that were not identified in Annova's vegetation survey.

IND15-6 Annova has included proposed lighting design measures to minimize contrast with the night sky in the landscape. These are discussed in the EIS. It is standard practice that some plans, such as the Facility Lighting Plan, are not prepared until projects advance into the final design phase. As stated in section 4.6.1.1, we recommend that the Facility Lighting Plan be filed prior to construction, and in section 4.6.1.2 we recommend that Annova consult with the FWS during development of the plan. We will evaluate the Facility Lighting Plan when it is filed, the public will also have the opportunity to review and comment at that time.

IND15-7 As described in section 4.6.1.2, all land within the Project site is under control of the Brownsville Navigation District. With regard to potential mitigation for loss of wildlife habitat, see response to comment CO10-58.

IND15-8 See response to comments CO4-3 and CO4-4.

IND15-9 Section 4.3.2.2 of the EIS describes the potential impact on South Bay, including seagrass beds, from sedimentation from Project dredging and LNG carrier traffic during operation. Cumulative impacts, including from operation of the 3 proposed LNG projects, are addressed in section 3.13.3.2, 3.13.3.3, and 3.13.3.4.

Wave and wake impacts from increased tanker traffic should be examined as well. IND15-9 Cont'd

10) Regarding migratory as well as nesting bird impacts, the DEIS says "Annova would attempt to limit clearing on the Project site to between September 1 through February 28 to avoid impacts…" "Would attempt" is very weak and unenforceable language and should be changed to "is required." IND15-10

11)The DEIS states that wetlands, the Channel, & mudflats at the terminal site are essential fish habitat (EFH). Yet it appears no study has been done of the fish & benthic resources in the channel at the Project site. IND15-11

12)Annova's consultations with FWS with regards to the Migratory Bird Conservation Plan and the Endangered Species Act should be finalized, as well as consultations with NMFS under the Magnuson-Stevens Fishery Conservation and Management Act. All should be included in the EIS for public review and comment. Requiring this information only "before construction" (hence after permitting) is not acceptable as it excludes the public. IND15-12

13)The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the costs for security, safety, and emergency response that will include our local police, fire, and medical services. These costs will be covered through a cost-sharing plan, and will include, but not limited to, training, emergency management, security/emergency equipment, patrol boats, firefighting equipment, overtime for police or fire personnel, and LNG marine carrier security. IND15-13

14)If Annova is built it would be one of the largest single stationary sources of nitrogen oxides, carbon monoxide, VOC's, sulfur dioxide, particulate matter and greenhouse gases in the Rio Grande Valley. To dismiss the proposed emissions because the NAAQS standards would not be exceeded ignores the unacceptable reality that air quality would be permanently worsened. The higher the air pollutant levels the more adverse health effects there are, especially to vulnerable populations. IND15-14

15)The Annova site is ¼ mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND15-15

16)The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? That the entire Annova site is within the launch closure area makes the site unsuitable for LNG. In Jan. 2019, high winds the SpaceX Starship Hopper prototype sample rocket was blown over.This is an indicator of what WILL happen in the future. Hurricanes? IND15-16

IND15-10 As stated in section 4.6.1.2 of the EIS, in the event that clearing could not be accomplished during the stated time window, Annova proposes to implement additional measures, as recommended by the FWS, designed to avoid or minimize impacts on nesting birds, which would be acceptable.

IND15-11 On February 5, 2019, the National Marine Fisheries Service filed comments with the FERC agreeing with the conclusions in the EFH Assessment (see FERC accession number 20190206-5004.

IND15-12 The Courts have upheld the Commission practice of issuing a conditioned Order (see Del. Riverkeeper Network v FERC). It is standard practice for a Commission Order to include a condition that construction may not proceed until all required consultations with federal agencies has been completed. This practice is also upheld by the courts (see Grapevine v FAA). The public will continue to have the opportunity to review and comment on filings as they are made with the Commission.

IND15-13 As described in section 4.12.5.8, Annova would be required to develop a comprehensive Emergency Response Plan (ERP), and Section 3A (e) of the NGA (as amended by EPAct 2005) specifies that the ERP must include a Cost-Sharing Plan that contains a description of any direct cost reimbursements the applicant agrees to provide to any state and local agencies with responsibility for security and safety at the LNG terminal and in proximity to LNG marine facilities. The cost-sharing plan must include the LNG terminal operator's letter of commitment with agency acknowledgement for each state and local agency designated to receive resources.

IND15-14 As described in section 4.11.1.2 of the EIS, the NAAQS, primary standards set limits the EPA determined would protect human health including sensitive populations such as children, the elderly, and asthmatics

IND15-15 Section 4.12.5.7 of the EIS includes an evaluation of potential impacts on the Annova Project from external events, including incidents at the proposed Rio Grande LNG and Texas LNG facilities.

IND15-16 Section 4.12.5.7 of the EIS includes an evaluation of potential impacts on the Annova Project from external events, including a launch failure at the SpaceX facility.

Patrick Anderson
Los Fresnos, TX

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

I, Patrick Anderson, hereby submit this comment regarding the DEIS for Annova LNG, Docket CP16-480-000.

FERC PROCEDURES AND TIMING OF THE RELEASE OF THE DEIS ARE COMPROMISING PUBLIC INPUT IND16-1

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

All consultations with all agencies should have been completed for transparency and public commenting on the DEIS.

All endangered species consultations with FWS and NMFS should be completed before the FERC Record of Decision, not "before construction." IND16-2

The FERC comment deadline should be extended for reasons that the FERC, USACE, and TCEQ commenting periods were at the same time. If government agencies are to take public comments with due diligence, then adequate time should be given to review documents from each agency IND16-3

The DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND16-4

CONCLUSORY STATEMENTS IN THE EXECUTIVE SUMMARY

FERC reached the conclusion that Annova LNG would have adverse environmental impacts. Our communities agree, as demonstrated from numerous local municipal and NGO resolutions opposing the Project including, but not limited to; IND16-5

IND16 Patrick Anderson, page 1 of 17

IND16-1 See response to comment IND14-6.

IND16-2 See response to comment CO10-65.

IND16-3 On February 7, 2019, FERC extended the comment period on the Draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

IND16-4 We disagree that the draft EIS was incomplete because of its non-availability in Spanish. See also response to comment CO6-3.

IND16-5 Comment noted. The EIS addresses the potential impacts of the Annova Project on the resources listed and addresses the potential cumulative impacts of the Annova Project combined with the TX LNG and Rio Grande LNG projects. The Commission will consider these potential impacts in its decision whether or not to authorize (permit) the Annova Project.

- Action South Texas
- Rio Grande Delta Audubon Society
- Laguna Madre Water District
- Surfrider Foundation, South Texas Chapter,
- Port Isabel City Commission
- South Padre Island Business Owners Association
- Laguna Vista Town Council
- South Padre Island City Commission
- RGV Hispanic Chamber of Commerce
- LRGV Sierra Club Chapter
- P.I. EDC
- Point Isabel School Board Withdrew 313 applications for Rio Grande and Annova LNG
- Long Island Board of Directors
- Rio Grande Delta Audubon Society
- Friends of the Wildlife Corridor
- Friends of Laguna Atascosa NWR
- Cameron County Democratic Party
- Hidalgo County Democratic Party

IND16-5 Cont'd

With regards to policy decisions and local control, permits should be denied.

LATERAL PIPELINE IND16-6

As stated in the Annova LNG DEIS, the LNG terminal would receive natural gas to the export facilities from an as-yet undetermined third-party intrastate pipeline. As identified in the USACE, Annova LNG plans to connect to the Valley Crossing Pipeline. Before issuance of any permits, verification of agreements between Valley Crossing and Annova LNG should be requested by the USACE.

Annova LNG has not found who will construct, own, and operate the pipeline that will feed Annova LNG. Thus, a complete consultation of avoidance and minimization between Annova LNG, the 3rd party builder/owner/operator and other agencies, has not been established, let alone completed. For this reason alone, a permit denied should be denied.

The validity of the 3rd party pipeline is put into question due to: IND16-7

IND16-6 See response to comments IND13-1 and IND13-2.

IND16-7 See response to comments IND13-1 and IND13-2.

1. Valley Crossing's multiple communications with FERC stating they will not attach to LNG facilities (i.e. they would not provide gas for LNG companies). IND16-7 - Cont'd
2. There is no publicly available information in FERC dockets, or otherwise, that indicates Valley Crossing has agreed for a connection to their pipeline. Connection to the Valley Crossing would likely change testing or service to the Border Crossing section of the Valley Crossing Pipeline. FERC communication would be required if any changes in testing or service to the Border Crossing project were to occur. No such communication appears to be in FERC dockets of Valley Crossing.
3. The cumulative impact with both Texas LNG and Annova LNG connecting to the Valley Crossing has not been determined, at least from publicly attainable information. It is likely that the amount of gas and/or psi of the pipeline may change. Communication with regulatory agencies and to the public and changes in amounts of gas and/or pressure has not happened and is not in the DEIS for Annova in the cumulative analysis. IND16-8

The validity of the pipeline and confirmation of agreements between Valley Crossing and Annova should be verified and reflected in the USACE and FERC decision to approve or deny permits.

WATER SUITABILITY ASSESSMENT IND16-9

The Coast Guard's suitability assessment overlooks factors, thus needs to re-examined. First and foremost, the Brownsville ship channel is currently not at a depth that is suitable for LNG tankers. The channel requires deepening and widening.

The Coast Guard did not take into consideration recommendations by the Society of International Gas Tanker and Terminal Operators (SIGTTO) as published in "Site Selection and Design for LNG Ports and Jetties".

The SIGTTO lists clear guidelines for site selection:

1. *There is no acceptable probability for a catastrophic LNG release.*

   A. Three LNG facilities proposed at the Port of Brownsville, in close proximity to each other, increases the probability of catastrophic LNG release and thereby not in accordance to SIGTTO guidelines and standards.

IND16-8 See response to comments IND13-1 and IND13-2.

IND16-9 The design, construction, and operating requirements for the Project are contained in 33 CFR 103 through 105, 33 CFR 127, and 49 CFR 193. In addition, Annova must meet the DOT PHMSA's siting regulations in 49 CFR 193. These regulations do not require the use of SIGTTO publications. However, certain design criteria described as recommendations in SIGTTO Information Paper No. 14, Site Selection and Design for LNG Ports and Jetties, (i.e., strength/positions of mooring systems and breasting dolphins; interlinking of ship and shore ESD systems; installing quick acting valves at the PERC connections; using sensors to monitor the positions of the LNG loading arms; limiting ignition sources on the jetty; use of tugs and pilots to safely maneuver the LNG marine vessel to the jetty, etc.) are considered during the Coast Guard and FERC's evaluation of the Project. In addition, as indicated in section 4.12.5.2 of the EIS, FERC staff conducted a engineering review on the use of various layers of protection or safeguards to reduce risks of potential hazards to off-site public. We also reviewed potential impacts from natural hazards and external impacts from the surrounding areas.

2. Liquefied natural gas ports must be located where LNG vapors from a spill or release cannot affect civilians. IND16-10

A. Tankers will be exiting the Port of Brownsville ship channel thereby passing only a matter of feet by Isla Blanca Park and the Jetties heavily populated by civilians' temporary residence at the Isla Blanca RV Park, and civilians using the beach, fishing, boating, taking eco tours, partaking in watersports, etc.
B. SIGTTO sites recommendations from Sandia National Laboratories of a distance of 2.2 miles and Dr. Jerry Havens (former Coast Guard LNG vapor hazard researcher) of 3 miles. Populated areas including Long Island Village, Port Isabel, and Isla Blanca Park are within these recommendations.
C. LNG industrialization at the Port of Brownsville do not adhere to SIGTTO guidelines and standards in regards to location where LNG vapors from a spill or release cannot affect civilians.

3. LNG ship berths must be far from the ship transit fairway; a) to prevent collision or allision from all other vessels, b) to prevent surging and ranging along the LNG pier and jetty that may cause the berthed ship to break its mornings and/or LNG connections, c) since all other vessels must be considered an ignition source. IND16-11

A. The Port of Brownsville ship channel is a narrow one-way channel that will be in close proximity to all Port of Brownsville ship transit fairway and thereby presents collision and ignition sources to LNG tankers.
B. The location of all proposed LNG facilities (Annova, Texas LNG, and Rio Grande LNG) are on the end of the ship channel near the entrance/exit. This results in all Port of Brownsville ship traffic passing by all three LNG sites entering and exiting the Port.
C. The SIGTTO also defines conflicting waterway uses to include fishing and recreational boating. Such water use in addition to eco tourism such as dolphin watches is heavy around the jetties and the waterways at the exit of the Port of Brownsville ship channel.
D. LNG industrialization at the Port of Brownsville do not adhere to guidelines and standards by SIGTTO in regards to ship transit fairway.

IND16-10 See response to comment IND16-9.

IND16-11 See response to comment IND16-9.

4. LNG ports must be located where they do not conflict with other waterway uses now and into the future. IND16-12

A. LNG tankers for one LNG facility, and especially 3 facilities, will conflict with other waterway uses in the ship channel and adjacent areas along the chip channel exit. The Brownsville ship channel is a one-way ship channel, and thus the waterway will be affected due to incoming and outgoing LNG tanker traffic. In addition, eco tourism (dolphin watches, fishing tours, etc.), and recreational use (kayaking, parasailing, windsurfing, fishing, etc.) traffic is heavy near the exit of the Port of Brownsville ship channel and the jetties.

5. Long, narrow inland waterways are to be avoided, due to greater navigation risk. IND16-13

A. As aforementioned, due to the narrow one-way ship channel, it presents a navigation risk compounded by an area that is heavily used by civilians near the exit of the ship channel.

6. Waterways containing navigation hazards are to be avoided as LNG ports. IND16-14

7. LNG ports must not be located on the outside curve in the waterway, since other transiting vessels would at some time during their transits be headed directly at the berthed LNG ship.

8. Human error always exists, so it must be taken into consideration when selecting and designing an LNG port.

A. Human error is a risk due to a narrow channel with marine traffic from other Port of Brownsville operations, multiple LNG land based operations, LNG tanker traffic servicing multiple LNG facilities, and the proximity to Space X.

IND16-12 See response to comment IND16-9.

IND16-13 See response to comment IND16-9.

IND16-14 See response to comment IND16-9.

It is in the public interest for FERC to request a response from the Coast Guard regarding the SITTGO recommendations and the conclusions to which deviance from these recommendations are acceptable. IND16-15

AFFECTED AREAS WITHOUT PROPOSED MITIGATION IND16-16

The applicant has stated that no permanent fill of wetlands or waterbodies would occur as a result of pipeline installation, and that temporary fill of wetlands or other waters filled would total 42.1 acres for the pipeline. Temporary workspace in wetlands is a deviance from FERC procedures. It appears that Annova LNG has not made requests to FERC for deviances in FERC procedures with regards to temporary workspace.

In addition to the aforementioned wetlands, mitigation should be required for the 409 acres of lomas that will be destroyed of which mitigation is not proposed. Lomas are unique geologic and biologic formations that have important functions to the ecosystem and for wildlife habitat. The plan to revegetate 53 acres after 4 years of construction is unrealistic. Lomas cannot be rebuilt or re-created. IND16-17

AVOIDANCE AND MINIMIZATION

Avoidance and minimization is not being proposed regarding the lateral pipeline. A comprehensive avoidance and minimization would require HDD for all wetlands. Considering the function and sensitivity of the ecosystem, the habitat it provides, and especially considering the cumulative impact to wetlands from all 3 proposed LNG projects, HDD should be required by the 3rd party builder of the pipeline for all wetlands. Seeing as how the 3rd party has not been acquired by Annova to build the pipeline, avoidance and minimization consultations cannot be made. FERC should require HDD for all wetlands and also not allow temporary workspace in wetlands. IND16-18

Annova's attempt to demonstrate that the modification of the project layout is a measure to fulfill the first two steps in the mitigation sequence (avoid and minimize) is suspect. While wetlands may be avoided, the sole purpose of the change by Annova was to avoid the wildlife corridor to the west of the Project and was communicated as such to the public and the press, as as exemplified in the Brownsville Herald on April 25, 2016. Annova made no statements with regards to modifying the project layout to avoid wetlands. Therefore, claiming the modified project layout as avoidance and minimization of wetlands is suspect and contradictory to previous communication from Annova. Furthermore, the modification of the project layout to accommodate a wildlife corridor on the west side of the Terminal project site ("Western Wildlife Corridor"), introduces other detrimental impacts, particularly on lomas. From a biological perspective, this is in no IND16-19

IND16-15 See response to comment IND16-9.

IND16-16 Annova's application to FERC does not include a pipeline. Potential impacts on wetlands from the supply lateral pipeline is under the jurisdiction of the COE.

IND16-17 See response to comments IND9-14a and IND15-1.

IND16-18 See response to comment IND16-14.

IND16-19 It is acknowledged that the Annova Project would permanently impact wetlands and lomas. This is disclosed in the EIS. Cumulative impacts on wetlands, lomas, and rare species, including from construction of the 3 proposed LNG projects, is addressed in section 4.13 of the EIS.

way avoidance and minimization. In any case, the modification of the project layout to accommodate the wildlife corridor would be negated if Rio Grande and/or Texas LNG is constructed. A cumulative analysis should be done by FERC and USACE on the conflicts between the project sites of Texas LNG, Rio Grande LNG, Annova LNG and mitigation proposals of all three companies. IND16-19 Cont'd

The original and modified project layout result in detrimental impacts on lomas which surround the wetlands on the project site. Lomas are tracts of land that should be of concern when issuing a formal determination. Lomas are of high importance to the public interest as they are unique geologic and biologic formations of immense ecological value and are essential for habitat and wildlife. Three lomas (409 acres) will be cleared, graded and built upon. No mitigation is proposed for the destruction of lomas. Regardless of the fact there is no mitigation plan for loma destruction, lomas cannot be mitigated via restoration or creation. From a biological perspective, this is more detrimental than the destruction of the wetlands. Therefore, the modified project layout should not be viewed as a viable measure for avoidance and minimization. Furthermore, Annova's mitigation proposal is not balanced against its foreseeable detriments. Taking into account other factors such as conservation and general environmental concerns, Annova's mitigation proposal is inadequate even by the most reasonable of standards. IND16-20

The DEIS inaccurately/falsely states "no forested vegetation would be affected by construction and operation of the Project. The majority of the Project site is covered in South Texas loma grassland and shrublands, Gulf Coast salty prairie, and coastal sea ox-eye daisy flats".[1] The DEIS specifically identifies three distinct lomas—Loma del Potrero Cercado, Loma del Divisadero, and the eastern portion of Loma de la Juaja—are located within the Project site.[2] Lomas are forested vegetation, not grassland. Lomas provide important and rare ecological functions. The picture below is a sampling of forestation on a loma in the project site. IND16-21

[1] Annova LNG DEIS 4-32
[2] Annova LNG DEIS 4-31

IND16-20 See response to comment IND16-19. With regard to mitigation for impacts on lomas, see response to comments IND14-a and IND15-1.

IND16-21 See response to comment CO6-04.

IND16-21 Cont'd

IND16-22

AFFECTED WETLANDS WITH PROPOSED MITIGATION

For the 53 acres of wetlands that will be destroyed, Annova proposes to re-flood Little San Martin Lake, an area already under the protection of the USFWS, and as such violates the no net-loss policy of the Clean Water Act.

The location of the Valley Crossing Compressor station should also be taken into account. Valley Crossing's compressor station will degrade the mitigation site proposed by Annova with regards to wildlife habitat.

IND16-23

CHARACTERIZATION OF LITTLE SAN MARTIN LAKE

Little San Martin Lake is characterized in Annova's mitigation plans as an area without water or much vegetation with terminology such as "LSML basin". Sheets 7, 10, 18, 22 show aerial images that depict the area as an area without water. The Public Notice states: "aerial photography shows emergent marsh surrounding LSML prior to the access road construction, but the wetlands gradually disappeared.[3] Annova also references mangroves that would be planted along the channels. Review of the mitigation area should be conducted by the USACE. The mitigation proposed by

[3] USACE Public Notice Annova LNG Application SWG-2015-00110, p6

IND16-22 See response to comment CO10-68.

IND16-23 See response to comment CO10-68.

Annova is enhancement, not creation as indicated in the USACE Public Notice. FERC should require Annova to demonstrate the difference between current mitigation site conditions and final conditions of the mitigation site represented with renderings to include where water is added, specific locations vegetation is to be planted and the types of vegetation to be planted. FERC should also request an analysis of current site conditions from the USACE. The site conditions at Little San Martin Lake, as described by Annova, are not accurate. IND16-23 cont'd

The following images were taken on January 27, 2019.

Little San Martin Lake as seen from Hwy 48.

The following pictures were taken from the location as indicated by the red arrow.

IND16-23
Cont'd

Water has not disappeared as as stated by Annova LNG in the USACE Public Notice.[4] Also notable is mangrove vegetation that is present in many areas that Annova states they will plant in channels. IND16-23 Cont'd

The mitigation proposal is not balanced against its reasonably foreseeable detriments. Detriments that not only include destroying more wetlands than being enhanced at Little San Martin Lake, destruction of lomas that can't be mitigated but also contributions to climate change IND16-24

CUMULATIVE ANALYSIS REGARDING MITIGATION IND16-25

The FERC and USACE should conduct a cumulative analysis of Texas LNG, Rio Grande LNG, and Annova LNG with regards to all respective permit applications. Annova LNG is proposing mitigation in which other projects would negate. For example, Valley Crossing's compressor station would negate Annova's proposal to re-flood little San Martin Lake, and the modification to accommodate the wildlife corridor is negated by Rio Grande LNG and Texas LNG from their impacts with sound and light on the wildlife corridor which would result in an environment that wildlife will avoid, thus voiding the original intent of the Annova's modified project layout and the purpose of the USFWS lease of the area for the purpose of preserving migration of wildlife. Annova LNG will negate the mitigations proposals proposed by Texas LNG and Rio Grande LNG with their project site which appears on or very near their mitigation proposals.

HISTORIC PROPERTIES IND16-26

With regards to historic properties, the USACE public notice states; "*The (gas supply pipeline) permit area is likely to contain terrestrial cultural resources that could be eligible for inclusion in the National Register of Historic Places. The applicant will need to conduct an investigation for historic properties.*" FERC should require an investigation for historic properties and it should have been conducted by Annova and included in their application to the USACE and the DEIS. This is reason enough for the permits to be denied.

WILDLIFE AND HABITAT

[4] USACE Public Notice Annova LNG Application SWG-2015-00110, p6

IND16-24 See response to comment CO10-68.

IND16-25 Cumulative impacts, including from construction of the 3 proposed LNG projects, is addressed in section 4.13 of the EIS.

IND16-26 Comments on the referenced COE public notice and permit application will be addressed by the COE. Potential impacts from the Annova Project on historic resources are addressed in section 4.10 of the EIS, and cumulative effects on cultural and historic resources are addressed in section 4.13.3.8.

The Living Wildlife Report found in its latest Living Planet Index that the wildlife population has declined by 60% in the last 40 years.[5] Locally in the the Rio Grande Valley, between 95-98% of the native landscape has been cleared for urban, agricultural, or industrial use. Annova LNG proposes to destroy valuable remaining habitat that will significantly impact our wildlife, wildlife habitat and ecosystem. With regards to the macro and micro trends of the last 60 years, this places native habitat in our region at a greater importance and value. The location of Annova LNG further segments habitat and will impact wildlife migration between the Laguna Atascosa and Lower Rio Grande Valley Refuges. The direct and indirect impacts will have a large scale impact environmentally. The values to the environment, wildlife and habitat in relation to these trends are not reflected in the DEIS. Thus, the impact to the environment is greatly understated and underestimated in the DEIS. IND16-27

The Annova LNG project is in direct conflict of regional, state, and national efforts to restore lost habitat. These efforts have resulted in the creation of the Lower Rio Grande Valley NWR, Laguna Atascosa NWR, Loma Ecological Preserve, Wildlife Corridor, Bahia Grande Restoration Project, Federal Ocelot Recovery Plan, and the recent conservation of 3,200 acres on South Padre Island and several hundred acres along the Bahia Grande near Port Isabel. These efforts represent strong social and cultural values within our region of the Rio Grande Valley. IND16-28

LNG projects negate the work and continued efforts of the citizens, organizations, government resources, and millions of dollars put forth over the time span of many decades. Thus, permitting of LNG projects that pose direct and indirect impacts outside of the Port of Brownsville boundaries should be denied, especially with consideration that only 2-5% of native landscape remains. LNG projects negate from the monies and efforts put forth to our environment and are in direct conflict with social and cultural values of the region and should be denied permits. Permitting of LNG projects that continue the trend of destroying that last remaining ecosystems in the RGV should be denied.

Any destruction of habitat within the Port of Brownsville should be mitigated prior to construction of the LNG Terminal as recommended by FERC. Because the mitigation plans are not in the DEIS, mitigation plans should be finalized and available to the public with a commenting period before issuance of FERC permitting. IND16-29

[5] https://c402277.ssl.cf1.rackcdn.com/publications/1187/files/original/LPR2018_Full_Report_Spreads.pdf, p4.

IND16-27 see response to comment CO10-57.

IND16-28 See response to comments CO10-57 and CO10-58. The Commission will take into account the potential impacts on these resources when considering whether or not to authorize the Annova Project.

IND16-29 See response to comment IND14-6.

As noted in the DEIS, an emphasis of the Laguna Atascosa Wildlife Refuge is for the conservation of habitat for endangered species. Additionally, an integral function of the refuge is the wildlife corridor immediately adjacent to the Rio Grande LNG boundary, rendering Annova's modified project layout useless. The wildlife corridor will experience the high noise levels, making it unlikely to be used by wildlife. The Lower Rio Grande Valley NWR, Laguna Atascosa NWR, Loma Ecological Preserve, Wildlife Corridor, Bahia Grande Restoration Project provide resources to many of the endangered and threatened species. IND16-30

Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...".

The permit should be denied according to Section 7 of the ESA due to the direct and indirect impacts on threatened and endangered species and habitat.

Annova LNG's mitigation proposals are not viewed by the public, nor should it be accepted by the agencies, as a viable or acceptable proposal. The RGV cannot afford net losses of wetlands and destruction of lomas at a time when only 2-5% of the native environment remain. Their proposals result in a net loss of habitat and wetlands and not in accordance to federal policy, and therefore FERC and USACE should deny permits. IND16-31

SOCIOECONOMICS IND16-32

The DEIS, nor Annova LNG, has identified a need for the Project and has not identified contracts to sell the LNG. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts, an unequivocal need for the product must be shown. This alone is reason enough to deny the permit.

The socioeconomic analysis detailed in the Draft EIS is narrow in view and incomplete. The analysis does not include costs to the taxpayer, and costs in response to the micro and macro consequences of LNG development that negate claimed benefits. IND16-33

Tax dollars will be used for security and emergency response. Security, safety, and emergency response will include our local police, fire, and medical services. Additionally, costs associated with training, emergency management,

IND16-30 As stated in section 4.7.3 of the EIS, consultation under the Endangered Species Act is ongoing. See also response to comment CO10-65.

IND16-31 The Commission will take into account the potential impacts on these resources when considering whether or not to authorize the Annova Project.

IND16-32 The Commission will take into account project need when considering whether or not to authorize the Annova Project.

IND16-33 We disagree the socioeconomic analysis in section 4.9 of the draft EIS is narrow in view and incomplete. With regard to cost of public safety and security, see response to comment IND15-13.

security/emergency equipment, patrol boats, firefighting equipment, overtime for police or fire personnel, and LNG marine carrier security are not accounted for. IND16-33 Cont'd

Annova will use public infrastructure. Public infrastructure requires maintenance and repair. Annova LNG's use of public infrastructure during construction and operations will include sewage, landfill, and streets. These costs are not accounted for in the socioeconomic analysis.

The cost associated with Annova LNG's contribution to climate change and damage to the environment is not accounted for in their economic analysis, which significantly negates claimed economic benefits. The Annova's Social Cost of Carbon defined by the EPA should be included in the socioeconomic analysis and negated from claimed economic benefits. While other costs associated with climate change are not as easily quantifiable, it is no reason for FERC or other agencies to wash their hands of it. As indicated in the 4th Climate Assessment, impacts on other sectors of the economy (e.g. agriculture, health care, insurance, etc.) are resulting from consequences to climate change. Exacerbating the impacts are the increased production and burning that Annova LNG and other LNG facilities will have. Natural gas and LNG is not a transition energy. When taking into account the whole value chain from extraction to re-gasification, LNG is more polluting than coal. IND16-34

The socioeconomic analysis also does not address the national concern for the protection and utilization of important resources which has national and international implications. The Pentagon was quoted on October 13, 2014 stating, "*climate change poses immediate risks to national security and will have broad and costly impacts on the way the US military carries out its missions.*" U.S. Defense Secretary was quoted as calling global warming a "threat multiplier" and that rising seas and increasing numbers of severe weather events could exacerbate the dangers posed by threats ranging from infectious disease to terrorism.

Permits to Annova LNG should be denied as these developments are detrimental to the US economy in the long term and have grave social costs on an international level. These economic and social costs are scientifically identified in recent findings by the Intergovernmental Panel on Climate Change and the US Government's 4th Climate Assessment. While it is recognized that FERC takes a free market approach, it is the responsibility of FERC to regulate and protect the public regarding social cost and impact which will occur on a regional level as well as an international level.

IND16-34 See response to comment CO7-03.

A complete and true cost to benefit analysis would demonstrate that Annova LNG, and all other fossil fuel use and continued development, is not economically beneficial and is a threat to our economy. As aforementioned, this is recognized by our own US government in the recent Fourth National Climate Assessment which identifies annual losses in some economic sectors projected to reach hundreds of billions of dollars by the end of the century—more than the current gross domestic product (GDP) of many U.S. states. Specifically in Texas, where oil and gas development is the highest in the country, it is also paired with among the highest costs to to respond to the consequences of continued development, particularly on coastal communities. IND16-34 Cont'd

The DEIS does not address the social cost and financial impact of hundreds of thousands of dollars and efforts that has been put forth towards ecological initiatives (e.g. Lower Rio Grande NWR, Laguna Atascosa NWR, Loma Ecological Preserve, Bahia Grande Restoration, Jaime Zapata Boat Ramp, etc.), that the Annova LNG project will directly impact . The DEIS does not take into the account social impact of the direct and indirect impacts to combined While not easily quantifiable, the social impact will be great due to Annova LNG's negative effect on many years of efforts of citizens and organizations. The efforts of thousands of citizens, organizations, and government agencies, which have occured at all levels, need to be taken into account in the cost-benefit analysis. The social issues and impacts must be weighed equally with the financial considerations in a true cost-benefit analysis. The social impact assessment of Annova LNG is non-existent in the DEIS. IND16-35

SOCIAL AND CULTURAL VALUES IND16-36

It must be noted that many years and efforts towards conservation and preservation of native land and habitat have occured in the region where the Project is proposed. This demonstrates strong social and cultural values to conservation, preservation, rehabilitation of native habitat and wildlife. These efforts have included citizens and organizations at all levels from municipal to federal and has led to the creation of, but not limited to;

1. Lower Rio Grande Valley NWR
2. The Laguna Atascosa NWR
3. Loma Ecological Preserve
4. Wildlife Corridor
5. Bahia Grande Restoration Project

IND16-35 In response to this and other similar comments on the draft EIS, section 4.9.2.3 of the final EIS has added to include a discussion of the potential Project impacts on the various conservation initiatives in the Rio Grande Valley.

IND16-36 See response to previous comment IND16-35.

6. Federal Ocelot Recovery Plan
7. The recent conservation of 3,200 acres on South Padre Island and several hundred acres along the Bahia Grande near Port Isabel

IND16-36 Cont'd

LNG projects negate the work and continued efforts of the citizens, organizations, government resources, and millions of dollars put forth over the time span of many decades. Thus, permitting of LNG projects that pose direct and indirect impacts outside of the Port of Brownsville boundaries should be denied. LNG projects negate from the monies and efforts and are in direct conflict with social and cultural values of the region and should be denied permits. Permitting of LNG projects that continue the trend of destroying that last remaining ecosystems in the RGV should be denied.

SPACE X SAFETY ANALYSIS

IND16-37

The DEIS does not include the Space X launch failure analysis. Since the completion of the Space X analysis, Space X is has changed their launch operations and are now considering launching the BFR rocket. An updated analysis of launch failures with new details regarding the BFR rocket needs to be initiated and included in the DEIS.

CUMULATIVE IMPACTS

38 - Cumulative Effects CrossRef1 Air Quality

Cumulative emissions of greenhouse gases would be massive (10.7 million tons per year), with Rio Grande being by far the largest contributor (8.5 million tpy). And this would continue for 20-30 years or longer, when we need to reduce carbon emissions drastically much sooner. This project, if approved & built, would move us in the opposite direction. That Annova's contribution to cumulative impacts on climate change cannot be precisely measured is no reason for it to be ignored.

IND16-39

The Annova LNG project is not balanced against its reasonably foreseeable detriments. Detriments that not only include destroying more wetlands than being enhanced at Little San Martin Lake, destruction of lomas that can't be mitigated but also contributions to climate change that is posing a national security concern as communicated by the Pentagon. Annova LNG will significantly contribute to climate change with a total of 363,649 tons per year of emissions from operations. This is not including contributions to climate change from other sources of their value chain (e.g. exploration, extraction, processing, pipelines, shipping across the world, re-gasification, distribution, and burning). It is contrary with the Pentagon's view, and other international leaders, to approve a permit for Annova LNG.

IND16-37 See response to comment CO10-75.

IND16-38 Cumulative impacts on air quality, including from the 3 proposed LNG projects, is addressed in section 4.13.3.9 of the EIS.

IND16-39 The contribution of the Annova Project to impacts on the resources listed are addressed in the respective sections of the EIS. The Commission will take into account the potential impacts on these resources when considering whether or not to authorize the Annova Project.

Other cumulative impacts as noted in the Rio Grande DEIS include, but certainly not limited to; IND16-39 Cont'd

- The greatest cumulative impacts" would be on soils, surface water quality, vegetation, wildlife, aquatic resources, threatened and endangered species, visual resources, land & water-based transportation, air quality, and noise.
- Cumulative impacts of the 3 LNG terminals on visual resources would be potentially significant. IND16-40
- 3 LNG projects cumulatively "would contribute significantly to air quality impacts, potentially exceed the NAAQS in local areas, and result in cumulatively greater air quality impacts. IND16-41
- 3 proposed LNG projects, would result in "significant cumulative impacts…" Therefore if FERC chooses to permit one project, it should deny all others. By FERC's own analysis the cumulative impacts would be too great (i.e. significant). IND16-42

Any one of the aforementioned cumulative impacts are reason enough to deny this permit.

IND16 continued, page 17 of 17

IND16-40 Comment noted.

IND16-41 Comment noted.

IND16-42 A finding of significant impact is not in itself reason for denial of a project.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking poses significant risks to our planet, our health, our ability to transition to renewable energy. For the sake of future generations, please oppose the LNG projects.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND17-01 IND17-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND17-03

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND17-04

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND17-05

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sarah Simpson
sarah.leslie.simpson@gmail.com
711 Patterson Ave
Austin, TX 78703

IND17 Sarah Simpson, page 1 of 1

This form letter or a nearly identical letter was also received from the following, which are not repeated here in this appendix:

Sanders (IND76), French (IND112), Arcand (IND113), FM (IND116), Nelson (IND152), Noriega (IND155), Neeley (IND157), Dieter (IND158), Garza (INC159), Sinclair (IND160), Manske (IND162), Goodman (IND163), Swearingen (IND165), Demarais (IND168), Collins (IND169), Williams (IND171), Guh (IND174), Wierenga (IND175), Jordan (IND176), Moczygemba (IND182), Hines (IND184), Beltran (IND186), Page (IND187), Carey (IND188), Shephard (IND190), Foreman (IND192), Powe (IND193), Unger (IND194), Traietti (IND195), Dixon (IND196), Hopson (IND197), Tanski (IND200), Myones (IND201), Telfair (IND202), Mulcihy (IND205), McIntosh (IND206), Oflaherty (IND207), Nongbri (IND208), Rives (IND212), Lyall (IND213), Rowland (IND214), Tatum (IND215), Rojas (IND218), Bush (IND220), Hall (IND222), Cantu (IND226), Wasserman (IND229), Wash (IND230), Garcia (IND231), Parker (IND233), Klugiewicz (IND234), Wiley (IND235), Navarro (IND240), Erdmann (IND242), Garcia (IND245), Huddleston (IND246), Shields (IND247) Gilath (IND248), Rivas (IND249), Bacon (IND252), Sulak (IND253), Mathre (IND256), Martin (IND308), Dingley (IND250), Holt et al (IND360), Russell (IND362), Adams (IND363), Mcvey (IND369), Smith (IND415), Dunlap (IND903)

IND17-1 Thank you for your comment. See the EIS for our assessment of potential impacts on communities and the local environment.

IND17-2 Thank you for your comment. Based on surveys completed and consultation with the Texas Historical Commission, the Annova Project would not destroy any known indigenous cultural sites. See section 4.10 of the EIS. Potential impact on local industries is evaluated in section 4.9 of the EIS.

IND17-3 Thank you for your comment.

IND17-4 Production, extraction, and end-use of natural gas, including from fracking, are not part of the scope of the EIS. NEPA review of the Project is limited to the socioeconomic and environmental impacts of the proposal before the Commission; therefore, the effects of production and end-use are outside of the scope of this EIS. Section 1.3 of the final EIS has been updated to clarify. See also response to comment IND9-14.

IND17-5 Thank you for your comment.

IND18 Donald Hockaday, page 1 of 1

Donald L Hockaday, Port Isabel, TX.

I prepared my comments and have them ready to submit in pdf format, but I can't figure out how to submit a pdf. If I copy and paste the word file, it will lose formatting and be difficult to read, plus it is much longer than 6000 characters. I will mail it to you via U.S. Mail. Thanks, Don Hockaday IND18-1

IND18-1 Thank you for your comment.

Christine G Rakestraw, Harlingen, TX.
In my opinion, there is a glaring omission in the draft EIS, Docket CP16-480-000, for the Annova Project: IND19-1
Acknowledgment of, research into and discussion of, impacts on the Lower Laguna Madre - the body of water through which the BSC and the Intracoastal Waterway pass through and are part of.

"The Laguna Madre of Texas and Tamaulipas is the only hypersaline coastal lagoon on the North American continent and the only one of five worldwide." "__the lagoon is renowned for its vast seagrass meadows, huge wintering bird population, and bountiful fishing grounds." "Recent concerns about increasing human activity have focused attention on the long term health of the Laguna Madre as growing population pressures, pollution problems, and dredging threaten this unique ecosystem." (source: The Laguna Madre of Texas and Tamaulipas, Edited by John W. Tunnell, Jr. and Frank W. Judd, Texas A & M University Press). Note: underline = my emphasis.

The Lower Laguna Madre is addressed in the draft EIS as a side reference when discussing other topics, i.e. page 117 - seagrass beds; page 153 - fisheries & South Bay Coastal Preserve; page 179 - turtles; page 202 - city of South Padre Island tourism, et al.

page 153: "The BSC is the only waterbody that occurs within the Project site. Bahia Grande and South Bay are connected to the BSC and are the nearest other waterbodies to the Project site." The BSC and South Bay and the Lower Laguna Madre are all directly connected. Check out nautical chart 11302, the relationship between these entities is quite plain - all connected. South Bay may be 2 miles from the Project site but the (water) entrance to South Bay is directly off the Lower Laguna Madre. Further, page 117 states, "Figure 4.3.2-2 identifies these waterbodies in relation to the Project site, and table 4.3.2-1 provides a summary of attributes associated with these waterbodies." No mention of the Lower Laguna Madre.

The word count discussing South Bay, The Bahia Grande, the Jaime J. Zapata Memorial Boat Ramp,
historical battlefield sites, National Wildlife Refuges, etc. is voluminous. Not so with the Lower Laguna Madre.

Also, a great deal is spent on discussing land based "recreation"; less on water based recreations - fishing, kayaking are mentioned, - what about recreation on the Lower Laguna Madre? Fishing- both by vessel of some sort and by wade fishing, kayaking, para sailing, dolphin watching, the Pirate Ship, the 'fast boat', etc. IND19-2

The impact on the Lower Laguna Madre from this Project, and especially the cumulative impact of 3 such large, industrial facilities, whether it be none to significant, should certainly have been addressed, in detail, in an EIS. The detail and repetitiveness of discussion on historic sites, etc. made the omission of the Lower Laguna Madre, as an entity, even more galling. IND19-3

IND19 Christine Rakestraw, page 1 of 2

IND19-1 Further discussion or reference to the Laguna Madre has been added to sections 4.3.2, 4.8.4, 4.8.5, and 4.9 of the final EIS.

IND19-2 Section 4.8.4 of the final EIS has been revised to include additional discussion of water-based recreation within the Laguna Madre.

IND19-3 See response to comments IND19-1 and IND19-2.

As is stated in the draft EIS, page 393, "The lands surrounding the Project site are largely undeveloped, providing a variety of dispersed outdoor recreational activities, including fishing and bird watching." On page 205, the terms rural, undeveloped and relatively natural are used. This would change with these 3 LNG projects. Page 396 states, "As multiple industrial facilities are constructed along the BSC and nearby the visual quality of the area would change from natural and partially developed to more industrial." IND19-4

Which leads me back to a sentence in the first paragraph: "Recent concerns about increasing human activity have focused attention on the long term health of the Laguna Madre as growing population pressures, pollution problems, and dredging threaten this unique ecosystem."

Why wasn't this unique and extremly important body of water given 'prime time' consideration in this EIS?

Note: ERROR - the EIS stated that the boat ramp on the Arroyo (Colorado) was in Willacy County. It is not. The popular boat launch facility is located in the Adolph Thomae Jr County Park, managed by Cameron County Parks & Recreation. This is the kind of error which makes one wonder about other items. IND19-5
Note: 35 pages of recommendations, a couple hundred plus - lots of items still to be addressed.

C. Rakestraw, private citizen and property owner, Port Isabel and South Padre Island
Chair, Lower Laguna Madre Foundation.

Disclaimer: 452 pages plus 242 pages is quite a bit for a private party to digest. While I tried to review the 452 pages, time* was short and it was not possible to review and digest All the pages. IND19-6

*I have a problem with time allotted to review and comment. This EIS was released just prior to holidays, reducing the realistic time for review/comment by a couple of weeks for most private citizens. Less than a month for review of 694 pages total and create comment is unacceptable.

IND19 continued, page 2 of 2

IND19-4 Project-related impacts on the Lower Laguna Madre would generally be limited to LNG vessel traffic within the existing navigation channel/BSC, where the channel passes along the very bottom of the Laguna Madre after passing through the Brazos Santiago Pass. However, based on this and similar comments additional discussion has been added to the final EIS.

IND19-5 Thank you for your comment. Section 4.8.4.2 of the final EIS has been revised to note that the boat ramp in Arroyo is in Cameron County.

IND19-6 Comment noted. On February 7, 2019 FERC extended the comment period on the draft EIS until March 13, 2019.

Barbara Hegarty
New-York, NY

Re: Annova LNG Docket No. CP16-480-000

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND20-1

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND20-2

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND20-3

SOCIOECONOMICS

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. IND20-4

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND20-5

CULTURAL RESOURCES IND20-6

Annova's archeological survey is inadequate. Concluding the absence of sites by

IND20 Barbara Hegarty, page 1 of 3

This form letter or a nearly identical letter was also received from the following individuals, which are not reproduced in this appendix:

Osborne (IND24), Fetonte (IND25), Sjodin-Bunse (IND27), Hyde (IND29), Penny (IND32), Carpenter (IND34), Tharp (IND35), Gay (IND36), Wright (IND37), Gagble (IND38), Villamizar (IND39), Garrett (IND42), Velez (IND43), Cohen (IND49), Killelea (IND50), Salinas (IND52), Perez (IND53), Hamilton (IND57). Holleschau (IND58), Schaffer (IND61), Mason (IND62), Hanks (IND63), Chavez (IND69), Maggs (IND75), A Gonzalez (IND1054), Acevedo (IND1055), Anderson (IND1057), Anzaldua (IND1058), Bloom (IND1061), Brown (IND1062), Celedon (IND1066), Cornejo (IND1068), DeLaGarza Und Senkel (IND1070), Galarza (IND1079), Garcia (IND1081), Gardner (IND1082), Goette (IND1083), Guerra (IND1085), Goette (IND1087), Herrera (IND1089), J Martinez (IND1093), Leekwijck (IND1096), M Hollmann (IND1097), Martinez (IND1099), Meinerding (IND1101), Mendieta (IND1102), Salinas (IND1112), Thurston (IND1116), Watts (IND1118), Williams (IND1142), Nieland (IND1143), Goette (IND1146), Goble (IND1148), Wittington (IND1150), Summers (IND1151), Herbig (IND1152), Salinas (IND1154), Cornejo (IND1160), Anderson (IND1165), Gonzalez (IND1166), Sheats (IND1167), Senkel (IND1169), Garcia (IND1171), Lara (IND1173), Hoenes (IND1177)

IND20-1 See responses to individual comments below.

IND20-2 We disagree that all plans and information must be available during preparation of the draft EIS. Information filed by Annova during the draft EIS comment period is available to the public for review after filing with FERC. On February 7, 2019, FERC extended the comment period on the draft EIS until March 13, 2019, as a result of the partial Federal government shutdown.

IND20-3 We disagree that the draft EIS is incomplete because of its non-availability in Spanish. See also response to comment CO6-3.

IND20-4 The need for the project will be evaluated by the Commission when determining whether to authorize the Project.

IND20-5 As described in section 4.12.5.8 of the EIS, Annova would be required to develop a comprehensive Emergency Response Plan (ERP), and Section 3A (e) of the NGA (as amended by EPAct 2005) specifies that the ERP must include a Cost-Sharing Plan that contains a description of any direct cost reimbursements the applicant agrees to provide to any state and local agencies with responsibility for security and safety at the LNG terminal and in proximity to LNG marine facilities. The cost-sharing plan must include the LNG terminal operator's letter of commitment with agency acknowledgement for each state and local agency designated to receive resources. The potential contribution of the Annova Project on climate change is evaluated in section 4.13.3.9 of the EIS. It is beyond the scope of this EIS to evaluate the micro and macro costs of climate change in general.

IND20-6 We disagree that the cultural resource surveys were inadequate. The survey protocol and results have been reviewed by the Texas Historical Commission. The reference to the number of shovel tests in the EIS is specific to just a small portion of the site that was surveyed and was not the total number of shovel tests conducted for the Project.

sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND20-6 Cont'd

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND20-7

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND20-8

PIPELINE IND20-9

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT IND20-10

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking

IND20 continued, page 2 of 3

IND20-7 Section 4.12.5.7 of the EIS includes an evaluation of potential impacts on the Annova Project from external events, including incidents at the proposed Rio Grande LNG and Texas LNG facilities.

IND20-8 See response to comment CO10-75 and CO10-73.

IND20-9 See response to comment IND13-1 and IND13-2.

IND20-10 See response to comment CO6-04.

into account the impact solely to lomas. IND20-10 Cont'd

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND20-11

IND20-11 See response to comment CO4-08.

February 4, 2018

Kimberly D. Bose, Secretary!
Federal Energy Regulatory Commission
888 First St., NE, Room 1A Washington, DC 20426!
Via FERC *eFiling*

Re: Draft EIS Docket No. CP16-480-000

Dear Ms. Bose:

Please include this transmission as a comment on the subject Draft Environmental Impact Statement.

Thank You,

Don Hockaday

Draft Environmental Impact Statements are prepared for three individual proposed LNG projects. Each DEIS has a cumulative impact analysis. There is no indication that if cumulative impacts are judged to be excessive, whether all permits will be denied or that one or two will be denied and how those decisions will be resolved. A more appropriate procedure would be to have a single, cumulative DEIS with sections on the individual proposals instead of, or in addition to, individual applicant proposals. The one cumulative impact statement would include all activities that would occur if all permits are issued: the individual projects, any deepening and widening of the Brownsville Ship Channel (BSC, Brownsville Harbor Canal), gas pipelines and stations for their entire lengths, all LNG carriers at maximum operation of all facilities, all restrictions of boating and fishing activities including shoreline fishing, the Space-X launch facility at Boca Chica and, of course, safety, congestion and pollution concerns. The process should be clear regarding how decisions would be made on individual applications should cumulative impacts be judged to be excessive. Lacking this clarity, the assumption seems to be that cumulative impacts are pre-judged to be acceptable and, it follows, so would individual applications. IND21-1

IND21 Don Hockaday, page 1 of 9

IND21-1 The Commission must evaluate each individual application as proposed and prepare the appropriate NEPA document. Within the cumulative impacts analysis in the EIS, the effects of all relevant projects on each resource is considered and disclosed. Reformatting the discussion would not impact the conclusion. The Commission will take into account the analysis in each EIS, including the cumulative impact assessment, when it considers whether or not to authorize each project.

I am disappointed that the term "public hearing" no longer means that members of the public may contribute public statements so other members of the public will be afforded a variety of opinions and facts. Sequestering individuals in corners to quietly provide input is far from America's historic respect for public discourse and participation. IND21-2

It is impossible to adequately contribute to the DEIS because it seems little more than a string of opinions without supporting documentation. The public should be provided a comprehensive environmental report similar to that of Espy-Houston's Environmental Report on the Deepening and Widening of the Brownsville Harbor Canal so the foundations of the opinions expressed in the DEIS can be reviewed. It is also impossible to adequately contribute to the DEIS if 120 paragraphs listing submissions and plans that are required are not included in the DEIS. The statement of section 3.2 NO-ACTION ALTERNATIVE is instructive: "Under the no-action alternative, the environmental impacts described in this EIS would not occur; however, the stated purpose of the Annova proposal would not be met." Section 3.8 CONCLUSION says, "Although many of the alternatives appear to be technically feasible, we identified no alternatives that would provide a significant environmental advantage over the Project. Based on these findings, we conclude that the proposed Project, as modified by our recommended mitigation measures, is the preferred alternative than can meet the project objectives." This focuses on a national level and pretty much says that the local impacts, and consequently alternatives, are of trivial concern. There is no reason that the national interest in LNG export cannot be addressed by LNG export terminals beyond south Texas. Just because the applicant prefers the BSC is not justification for restricting alternative analysis to within an arbitrary span of the nearby Texas coast. The "stated purpose" overrides all other considerations. Port Mansfield was dropped from consideration simply because it would cost more. The fact is ignored that the three proposed projects combined are estimated to cost in the billions of dollars no matter where sited. IND21-3 IND21-4

Scoping is the process used to determine the appropriate contents of an Environmental Impact Statement (EIS). Public participation is an integral part of scoping. In good faith, I contributed to the DEIS scoping process with two written comments and one oral recitation on September 4, 2015. My concerns were that some crucial aspects and risks of proposed LNG terminals would be overlooked: IND21-5

IND21-2 Comment noted.

IND21-3 CEQ directs agencies to reduce paperwork and the accumulation of extraneous background data. Conclusions contained in the EIS are based upon much additional information that is on the public record and the FERC project docket, as referenced in the EIS. Conclusions are also based upon the extensive experience of staff who have prepared numerous impact statements describing gas infrastructure projects and, importantly, have conducted compliance reviews of gas infrastructure projects that were constructed. With regard to plans that are not yet finalized, see response to comment IND14-6.

IND21-4 See response to comment IND02-3. Port Mansfield was eliminated from further analysis due to the extensive amount of dredging that would be required and the environmental impacts within the Laguna Madre that would be associated with that dredging. Section 3.4 of the final EIS has been revised to clarify.

IND21-5 See response to comments IND21-6 through IND21-10.

- The fact that the enormous LNG carrier transits of the Brownsville Harbor Canal (Brownsville Ship Channel, BSC) could critically impact its ability to support bait shrimping, a keystone industry in the Laguna Madre Area (Port Isabel, South Padre Island, Laguna Heights, Laguna Vista and Long Island Village). IND21-6
- The sites of the proposed LNG facilities and the BSC are located very near a dangerous, lawless border and will present an attractive soft target for terrorists. IND21-7
- The Laguna Madre Area is dependent on fishing, tourism and retirees for its economy and way of life. Industrialization, industrial blight, congestion and perceived safety issues are sure to degrade the attractiveness of the area for visitation and retirement. This is likely to cause loss of existing jobs and closing of existing small businesses for those who make the LMA their home. The "jobs created" are most likely to be minor in impact compared to the jobs lost. IND21-8
- The possibility of routine or permanent closure of most of the BSC to shoreline fishing, camping and picnicking may be the final blow eliminating appropriate family shoreline recreational opportunities for low-income Hispanic families in Cameron County. IND21-9

Now, three-and-one-half years later I find that FERC simply ignored my concerns in their entirety. IND21-10

Please refer to my September 4, 2015 scoping comments and documentation, but here are some brief excerpts on terrorism threat:

> Our area is unique among potential LNG export sites because it presents a special terrorism threat. Brazos Santiago Pass is only seven-and-one-half miles from Mexico. All the proposed sites are within five miles of Mexico, a short flight for drones or suicide pilots. Five miles is an almost negligible distance considering smugglers move thousands of human beings and hundreds, if not thousands, of tons of drugs to every part of the US every year. ...
>
> With eleven existing FERC jurisdictional import/export terminals, ten proposed new or expanded terminals approved for construction, and over twenty other potential terminals being processed at locations presenting very low terrorism risk, siting even one LNG terminals this close to the Mexican border is an unnecessary and unacceptable security risk for the United States and, especially, Cameron County. How will Homeland Security protect against those risks? Indeed, what will the precautions entail after a terrorist attack on any port in the US, an attack on any LNG facility in the US or Europe, or any attack near or across the US border with Mexico or Canada? Even unsuccessful attacks are adequate to dramatically elevate security protocol (*viz.* Shoe bomber, Underwear bomber). ...

At a meeting of concerned Cameron County citizens at the U.S. Coast Guard office in Corpus Christi, Texas I asked LNG cognizant Coast Guard officers how the Coast Guard planned to address the risk of terrorist attack from the adjacent, lawless border. I also asked whether there would be restrictions on beachgoers and fishermen when LNG carriers passed through the Jetties and along the ship channel. In both cases, I learned that these were not within the purview of the

IND21-6 The potential impact on bait shrimping is addressed in section 4.9, however additional analysis has been added to the final EIS.

IND21-7 The potential threat of terrorism is addressed in the discussion of LNG terminal and marine facilities security in several locations within section 4.12 of the EIS. See also response to comments IND12-1, and IND21-5.

IND21-8 The potential impact on the existing economy of the region, including fishing and tourism, is addressed in section 4.8 and 4.9 of the EIS. Additional description of the recreation-based industry of the Laguna Madre has also been added to the final EIS.

IND21-9 Construction of the Annova Project, as well as the Rio Grande LNG and TX LNG projects, would result in eliminating public access to the BSC shorelines within each facility. With the exception of the shoreline within the LNG terminal facilities themselves, no restrictions are anticipated on recreational fishing or other shoreline activities along the BSC or along beaches or jetties that would be passed by LNG carriers.

IND21-10 See response to comments IND12-1, and IND21-5.

Coast Guard because its purview stops at the water line. I still have no answer to those questions and I see no indication in the DEISs that FERC has even addressed them. I stress again that the proposed projects in the BSC are unique among all other existing and proposed LNG export sites and must be treated as such. Until a full and public investigation and evaluation has been accomplished, all LNG permit applications should be put on hold. The applicants and FERC should have pursued resolution of the questions long ago and have had ample time to have done so. IND21-10 Cont'd

I was also specific in my scoping comments about the serious threat to the Laguna Madre Area economy and way of life presented by the addition of enormous LNG carriers to BSC traffic. One such risk is possible decimation of our bait shrimping industry. IND21-11

> The Brownsville Ship Channel is almost the only source for live bait in our area. Any disruption in our live bait supply can have far-reaching, cascading impacts that we must recognize. Laguna Madre Area charter boat captains need live shrimp for their bread and butter charters. The bait stands and charter fishing industry, in turn, supports weekend and longer-term tourism, day-trips of area and regional fishermen, and our retirement and Winter Texan communities. The economy of these industries has multiplication effects on nearly all area businesses. Our bait shrimpers also supply the Arroyo Colorado bait stands and often augment the bait supply at Port Mansfield. Sports fishing boat sales and manufacturing and tackle shops are spread across the entire four-county area. The Port Isabel bait and sports fishing industry not only supports the area's tourism industry, they add immeasurably to the quality of life of many families across the entire socio-economic spectrum throughout our four county Rio Grande Valley. Reliable, long distance trucking of live bait shrimp is economically impractical at any time of the year and especially during the high tourism season in summer. The necessary zoning, closing and restricting of access to the Ship Channel due to increased safety and security risks and threats because of LNG terminals and ships will very seriously encumber the bait shrimping industry, and hence the economy of the area.

The DEIS mentions bait shrimping: (emphasis mine):

> **4.6.2.2.** "Dredging would also permanently remove the soft bottom habitat of the BSC within the footprint of the dredged area, causing a loss of habitat. Some bottom dwelling (demersal) species such as mollusks, crustaceans, **and shrimp (if present)** may be entrained (and likely injured or killed) during dredging activities.
>
> **4.9.2.3.** "Commercial fishing near the Project mainly takes place in the Gulf of Mexico, with some fishing also taking place in estuarine waters, **and a few shrimp boats that trawl in the BSC** for marketable bait shrimp. … The commercial fishing that does occur in the estuarine waters of Cameron and Willacy Counties are dominated by bait fisheries, with a small black drum (*Pogonias cromis*) commercial fishery also present (Fisher 2015). The bait fisheries are almost exclusively shrimp, **with most shrimping occurring in and around the Intracoastal Waterway** where the water is deep enough for the gear to deploy (Fisher 2017). … Dredging

IND21 continued, page 4 of 9

IND21-11 Potential impacts on the bait shrimping industry that uses the BSC are discussed in section 4.9.2.4 of the EIS. As noted in the section, TPWD provided information about bait shrimping in the area (i.e., Fisher, 2015, 2017). We issued an EIR to Annova on March 15, 2019, requesting additional information regarding potential impacts on the Brownsville-based shrimp industry from proposed LNG vessels transiting the BSC. The information request asked that Annova provide a discussion of mitigation measures to reduce the potential direct impacts of Project-related LNG vessel traffic on the Brownsville-based shrimp industry. The request also asked if Annova would commit to funding a study of the cumulative impact of LNG vessels from all three proposed LNG terminals on the Brownsville-based shrimp industry. See information filed by Annova in response to our EIR, on the FERC docket under accession number 20190325-5179.

activities during Project construction would temporarily affect those shrimpers who operate adjacent to the Project site. Annova estimates that in-water dredging would require approximately 176 working days. **Temporarily displaced shrimpers would be able to trawl elsewhere in the BSC or nearby Gulf of Mexico.** Access to the portion of the BSC adjacent to the Project site would be restored following the completion of dredging, subject to any security measures in place while LNG carriers are present. … In addition, for safety reasons, **the few shrimp boats that trawl for bait shrimp in the BSC** may be required to delay or postpone shrimping activities when an LNG carrier is moving through the fairway due to the moving safety zone located around the LNG carriers (see section 4.9.10.2). … Bay shrimping vessels primarily dock at Port Isabel, **with those that come into the BSC to trawl** for bait shrimp **generally operating between sunrise and noon** … IND21-11 Cont'd

It is difficult to believe FERC even read my comments nor spoke with area bait shrimpers or Texas Parks and Wildlife Department. Here are my notes on the highlighted text above.

- "Shrimp (if present)": Yes, shrimp are present in the BSC and in harvestable numbers.
- "most [bait] shrimping occurring in and around the Intracoastal Waterway": Nearly all bait shrimping occurs in the BSC.
- "Temporarily displaced shrimpers would be able to trawl elsewhere in the BSC or nearby Gulf of Mexico": It is difficult enough for bait shrimpers to make a living and supply the needed resource when allowed to trawl where they know they have a good chance for success. All locations are not equally productive. Bait shrimping is not done in the Gulf of Mexico in our area.
- "The few shrimp boats that trawl of bait shrimp in the BSC" and "with those [bait shrimpers] that come into the BSC to trawl": Pretty much all bait shrimp boats trawl in the BSC. The number (large or small) of bait shrimp boats is determined in part by the market.
- "generally operating between sunrise and noon": By Texas Parks and Wildlife Department regulations, bait shrimping in Cameron County is restricted to daylight hours.

Almost all mentions of turbidity and bottom scouring in the DEIS relates to point-source, temporary dredging activity at the individual projects' berth during construction activities. Almost all mention of LNG carrier impacts treats LNG carriers as just additional ships, comparable to tankers, container ships and barge tows and on shoreline erosion. The fact that LNG carriers have enormous displacement tonnage, width and draft (38-40') is ignored in terms of habitat impact. The cumulative impact of LNG transport by the three applicant LNG export facilities on turbidity, benthic disruption, and shrimp habitat degradation is not specifically addressed in the DEIS, but page ES-13 does state that combined activities of the three applicant projects "would result in significant cumulative impacts from sedimentation/turbidity and shoreline erosions within the BSC during operations from vessel transits." The fact that it is IND21-12

IND21-12 Section 4.3.2.2 of the EIS includes an evaluation of potential impact on water quality from LNG vessel transit within the BSC, including from shoreline erosion from vessel wakes and propeller wash, and from resuspension of bottom sediments from propeller wash during transit of fully loaded, outbound LNG carriers. Section 4.3.2.2 in the final EIS has also been updated to note that the BSC was specifically created to provide deep water access for maritime commerce, and as such, use of the waterway by LNG carriers would be consistent with the planned purpose and use of the BSC.

In section 4.13.3.2 we address potential cumulative impacts on surface water, and as stated in that section, given the substantial increase in large vessel traffic within the BSC related to the three Brownsville LNG projects, and other projects, it is expected that cumulative impacts on surface water resources associated with shoreline erosion and turbidity from increased vessel traffic would be persistent and moderate to significant throughout the life of the projects, particularly along unarmored portions of the BSC.

currently proposed that LNG carriers will transit the BSC only during daylight hours is positive from some perspectives but disastrous to bait shrimping. Page ES-12 allows that "small vessels and recreational boaters attempting to access South Bay and the BSC would likely experience delays, ranging from 11 to 32 percent of daylight hours per year." Most bait shrimping is done during morning hours and a single passage of even a moderate size ship ruins bait shrimp harvest for hours. We can expect that LNG carriers will be staged offshore or at birth to move into the channel at first light. Bait shrimpers will have to vacate the channel at the peak of productive trawling and it will be pointless to return after LNG carrier passage. Perhaps TPWD will modify its regulations to partially ameliorate the damaging restrictions on trawling hours and if FERC had even considered the impacts on bait shrimping it would have asked. However, habitat destruction and turbidity caused by LNG carriers presents no apparent mitigation opportunities. IND21-12 Cont'd

What will be the short and long-term impacts on the future of bait shrimping due to cumulative impacts of LNG transport in the BSC? Further, what is the economic importance of any negative impact on bait shrimp production to the Laguna Madre Area economy? Finally, were area stakeholders in the bait shrimp industry (bait shrimpers, bait retailers, charter boat captains) and Texas Parks and Wildlife Department Coastal Fisheries consulted concerning the potential impacts of regular, aircraft carrier-size ship traffic on daily and long-term bait shrimp production and, if so, will FERC please provide summaries of the meetings and a list of attendees?

The DEIS tends to have a bias concerning scale. Positive economic impacts and jobs are evaluated broadly over a two-county area, washing out the negative impacts on the adjacent communities. The Laguna Madre Area is nearly ignored by FERC even though every elected commission and board in the Laguna Madre communities have passed resolutions opposing LNG export terminals in our area. Port Isabel is the nearest populated area to the three proposed projects and isn't even listed among "nearby municipalities" in Section 4.9.1 POPULATION; neither are the municipalities of Laguna Vista and Long Island Village. Another set of my scoping comments that seems ignored is the impact on recreational tourism and retiree population. IND21-13 IND21-14

A rarely asked question is why do so many people come to our hotels and resorts instead of other, closer and often cheaper locations with good fishing, clean beaches, and good accommodations and services. The obvious hypothesis is we have the only coastal recreational and resort area left in Texas with clean beaches, good fishing, and watersports infrastructure that does not also have industrial blight. Except for an occasional offshore

IND21-13 In response to this comment, population information for the city of Port Isabel, the town of Laguna Vista, and Long Island Village has been added to section 4.9.1 of the final EIS.

IND21-14 The contribution of recreation and tourism to the regional economy is discussed in section 4.9.2.2. As noted in section 4.9.1, the Rio Grande Valley is home to a large seasonal winter population of retirees temporarily relocating to the area. Impacts on existing recreational resources are assessed in section 4.8.4.2. Construction and operation of the Project would result in site-specific impacts on recreation and visitor use during construction and operation. As discussed in section 4.9.2.2, these site-specific impacts are not expected to affect overall regional tourism patterns, but could result in localized impacts, with visitors and other recreationists seeking similar opportunities nearby or elsewhere in the region.

oil rig in port for maintenance and an industrial park near Brownsville, the Laguna Madre area has been spared the fate of other Texas beach and bay resort areas.

IND21-14 Cont'd

It is crucially important in the hospitality industries to maintain repeat patrons. Although the market is notoriously fickle, our tourism and hospitality industries have an admirable record for returning visitation. Our repeat patrons will not overlook miles of 15-story high Borg-like chemical plants with 20-story high storage tanks and 400' high flares, nor will they appreciate the light-pollution sky glow. Our many eco-tourists, especially, will be not be only displeased, they will be appalled and insulted that this will be nestled within a National Wildlife Reserve, a wildlife corridor and the largest wetland restoration project in North America.

In a 2006 survey of South Padre Island visitors, "a safe place to visit" was selected as the number one attribute responsible for their choice of the Island. Eco-tourism was listed as number three among "most popular activities." A "tropical island atmosphere" ranked as number two for the "primary reason" they visited South Padre Island. An astounding ninety-five percent of respondents said they planned to return.

Our visitors will see what they see and will be disinterested in lectures on safety records or aesthetics. Miles of industrial blight with multiple fifty-five-million gallon storage tanks filled with hazardous liquid is not a tourism amenity. Enormous ships filled with thirty to fifty million gallons of flammable liquid passing nearby, escorted by Coast Guard gunboats, will not be ignored by those who have been coming here yearly for "a safe place to visit," to enjoy the "tropical island atmosphere," and for "eco-tourism" activities.

The economy of eastern Cameron County is directly dependent upon tourism, Winter Texans, and retirees. These are especially fragile markets. Market surveys are a common tool for industries and resort areas. It is quite reasonable that FERC supply or require comprehensive, unbiased surveys of these populations to predict the LNG impact on these markets.

There should be market studies of summer tourists, holiday tourists, spring breakers, Winter Texans, and retirees to estimate project impact on these markets. It is important to include Mexican nationals. They visit in large groups especially during Cinco de Mayo, pre-Christmas, and the hottest part of the summer. Shopping is an important purpose of their visits, and their economic impacts are felt throughout the Rio Grande Valley. Separate surveys should be prepared for each of these target populations. Typical tourism market questions should be included to allow comparisons to other resort areas.

Three-and-one-half years later, no such market study is found referenced in the DEIS and little more than unsupported opinion is provided. The fact that the Laguna Madre Area is largely unspoiled by industrialization and presents visitors with ecotourism and natural environment experiences that are much different than other current, planned and under construction LNG export sites makes this area unique among alternate sites in North America. While it might be possible over time to partially recoup visitor numbers, the repeat visitors should not be expected to return to a different experience from the one they have been enjoying, year after year. Retirees and Winter Texans, in particular, may be especially sensitive to the drastic change.

The DEIS provides opinions related to environmental justice, mostly related to the project site itself. I find no mention of my expressed concerns related to access to appropriate shoreline and coastal recreation access for the low-income, predominately Hispanic, community. IND21-15

> The Hispanic community is very family oriented. Its recreational activities tend to involve active participation among all family members from great grandchildren through great grandparents, and they are most often outdoors. Over the last decades, these opportunities have slowly been eroding in coastal Cameron County, and disproportionally so for the many low-income Hispanic families. Private land, including along the shoreline, is being fenced from fear of litigation. County parks have been expanding, but fewer are free and entry fees are rising for the others. It is difficult to find free parking within the town of South Padre Island for beach access. There are fees to use the county parks and even the undeveloped beach on Padre Island. Boca Chica has been popular for poor families and middle-income Hispanic families, but Space-X will seriously impact its use and the Boca Chica area might eventually be closed entirely. The Jaime Zapata boat ramp park and shoreline fishing along the ship channel and Bahia Grande are about the only opportunities left for these community members and their families to take advantage of our coastal zone. It is essential to assure that these last meager opportunities are not curtailed even slightly.

Project elimination of appropriate, free access to accommodate low-income Hispanic family groups for coastal recreation is not mentioned in the DEIS. Perhaps this is due to the lack of mitigation opportunities.

Conclusions

Preparation of the Final EIS should include: IND21-16

1. A comprehensive study by the Department of Homeland Security on risks of and response to possible terrorist attacks on the soft targets of storage tanks and ships so near a dangerous, lawless border. Further, likely appropriate regulations that may be implemented if any port, any border or any LNG facility in North America is found to be a target of terrorism should be clearly outlined.
2. Consultation with Texas Parks and Wildlife Department to determine what, if any, changes in regulations are foreseen to allow bait shrimping to continue to supply necessary bait shrimp for the Laguna Madre Area. IND21-17
3. A funded study of potential impact on bait shrimping of massive LNG carrier transits in both directions by all three proposed LNG projects operating at their full design capacity added to projected traffic by other ships.

IND21-15 As discussed in section 4.8.4.2, construction and operation of the Project would not permanently affect access to the majority of regional fishing locations in the waters in the vicinity of the Project site, including the estuarine waters of Cameron and Willacy counties and the offshore Gulf of Mexico. Project construction and operation may, however, as discussed, temporarily affect access to recreational fishing and boating activities along the BSC, including the Jaime J. Zapata Memorial Boat Ramp Fishing Pier and Kayak Launch Area. As described in the EIS, the Project site has been used in the past as an informal fishing location, boat launch, and BSC access point for anglers. Public access to the site is presently blocked, following a request from the U.S. Border Patrol, and would continue to be blocked during Project construction and operation.

IND21-16 We do not agree that a separate study by the Department of Homeland Security is required. See also response to comment IND12-1.

IND21-17 We are not aware of any consultation with TXPWD with regard to changes in regulations related to bait shrimping should the Annova Project, or the other two LNG projects, be approved, or of a funded study of potential impact on the bait shrimp industry. However, in response to this and similar comments on the draft EIS, we issued an EIR to Annova on March 15, 2019, asking if Annova would commit to funding a study of the cumulative impact of LNG vessels from all three proposed LNG terminals on the Brownsville-based shrimp industry. See information filed by Annova in response to our EIR, on the FERC docket under accession number 20190325-5179.

4. Fund Laguna Madre Area joint Economic Development Corporations for a comprehensive study to determine the number, demographics and economic contributions including multipliers for short-term and long-term visitors, day trippers, Winter Texans, Mexican Nationals, spring breakers, retirees, and vacation homeowners. The potential impacts of LNG projects and carriers on visitation and retiree communities should be evaluated. Additionally, survey Laguna Madre Area businesses for managers and owners opinions of potential impacts of LNG facilities on their businesses. This should have been done at the start of permitting activities. IND21-18
5. Determine and guarantee the maximum restrictions that might be implemented on shoreline and beach activities including fishing, surfing, sun bathing, swimming, windsurfing and crabbing including during passage of LNG carriers. Establish the need, if any, of exclusion zones, signage, and emergency shelters including at Isla Blanca Park, Dolphin Cove area, jetties, Long Island, and the shoreline of BSC. IND21-19
6. Fund an environmental justice study on the potential impacts of LNG facilities and carriers on shoreline recreation opportunities for low income and minority communities. IND21-20

A public statement at a joint Chambers of Commerce update by a representative of one of the LNG companies (Rio Grande LNG) allowed that it would spend between $80-$100 million on permitting alone. In my conversations with representatives of the other two (Annova and Texas) indicated that they would each likely spend toward the lower end of that range. With an estimate of upwards of a quarter billion dollars for permitting alone, certainly the above studies would amount to a tiny fraction of the estimated set asides for permitting by the three LNG applicants. Considering that the above concerns were brought to the attention of FERC and the applicants over three years ago obviates possible complaints related to time constraints for permit approval. I suggest the three applicants pool funds and provide a one-year grant to Laguna Madre Area joint EDCs of one-million dollars (less than one-half of one percent of permitting set asides) to accomplish the above-mentioned studies. IND21-21

IND21-18 The FERC has not required such a study, nor are we aware that such a study has been completed.

IND21-19 See response to comment IND21-9.

IND21-20 Environmental justice is adequately addressed in section 4.9.9 of the EIS. See also response to comment IND21-9.

IND21-21 Thank you for your comment. See responses to the individual comments above.

Comment on Docket No CP16-480-000 Annova LNG

I am just submitting a copy of my comment to USACE regarding Annova LNG for now BUT WANT TO ADD THE IMPORTANT QUESTION OF WHETHER OR NOT Annova's 6 to 8 mile lateral pipeline is now jurisdictional to FERC now that Annova says it will be building the lateral itself? IND22-1

@@@@@@@@@@

Comment on SWG-2015-00110 (Annova LNG)
Submitted to swg_public_notice@usace.army.mil on 01-29-2019

Note: My main focus in my comments below center more on Annova LNG's credibility problems than on the specifics of its proposed project and related detrimental environmental impacts. IND22-2

1) I am requesting a Public Hearing on this permit request. There has been strong, continued public interest in and concern about all the LNG related operations targeting our areas by city councils, grassroots groups, and individuals since May 2014. IND22-3

2) I am also requesting an extension of the comment deadline on the basis of my 12-27-2018 email alerting you that the Alternatives Analysis link on the initial Public Notice page was incorrectly linked to a Texas City TX project (https://www.swg.usace.army.mil/Media/Public-Notices/Article/1721750/swg-2015-00110-annova-lng-common-infrastructure-llc-brownsville-ship-channel-ca/ was incorrect. The deadline should be reset in relation to when the link was corrected 01-14-2019. IND22-4

3) I don't believe that Annova LNG's expressed concerns for the unique environment impacted by its proposed projects should be trusted as a basis for its plans or actions. IND22-5

Annova LNG is, after all, a for profit business operation. So its primary goal is making money. In addition, It's already too heavily invested in doing its proposed project here to start the permitting process elsewhere. These business concerns would, reasonably and logically, take priority over its concern for minimizing the environmental impact of its proposed project here. It would, reasonably and logically, minimize mitigation costs to the extent possible to get the permits it needs to build an operate its project here.

After all, it seems willing to skimp on worker safety. For example, on 11-20-2018, the company told FERC it wouldn't be building its Marine Control Room to protect workers there from radiant heat originating from a possible LNG storage tank dike fire. Instead, it proposed making heat protective garments available to the Control Room operators adequate for the less than 5-minute walk needed for them to get far enough away from the heat for their safety. IND22-6

In other words, the company's too cheap to adequately protect its workers in case shit happens.. For example, in case the escape pathway is blocked, someone trips and falls, someone else undid some of their protective garment

IND22 John Young, page 1 of 4

IND22-1 As stated in section 1.4.1 of the EIS, the natural gas supply pipeline is a FERC non-jurisdictional facility. The application to the COE did not change that status.

IND22-2 Thank you for your comment. As noted, this comment is directed to the COE.

IND22-3 Thank you for your comment. As noted, this comment is directed to the COE.

IND22-4 Thank you for your comment. As noted, this comment is directed to the COE.

IND22-5 Thank you for your comment. As noted, this comment is directed to the COE.

IND22-6 Thank you for your comment. As noted, this comment is directed to the COE.

for greater comfort, another worker's on medication, it happens in the dead of night when it's hard to get up to get oriented and up to speed etc. IND22-6 Cont'd

Are we really suppose to believe anything this company says about minimizing the risks its project poses to the environment when, in this example, it doesn't appear to be minimizing the risks its project poses to its workers?

In addition, look at the way it downplays its project's probable impacts on the Ocelots traversing our local wildlife corridor. In its Draft EIS pages 167 to 168, it emphasizes that only one transient Ocelot spotting has been documented in the corridor here and highlights the fragmentation of the corridor as the greatest threat to Ocelot persistence in the area. It cites the work Dr Michael Tewes. IND22-7

Tewes is connected to the Kleberg Wildlife Research Institute, was a panelist in a by invitation only 10-20-2015 LNG company only presentation in Harlingen TX, and argued there that Ocelots would become extinct in the US in 50 to 75 years due to inbreeding and other factors ("LNG, Pro or Con? Liquefied natural gas supporters, opponents speak out," Fernando del Valle, 10-20-2015, Valley Morning Star, http://www.valleymorningstar.com/premium/article_14ab0a5a-77a5-11e5-8118-fb6a1a2af8f3.html). Then in December 2015, Annova LNG gave the Kleberg Research Institute a $40,000 grant for GPS-enabled collars and other equipment for the tracking of Ocelots in our area (*"Gas company funds efforts to save endangered ocelots," By Dane Schiller, 12-20-2015, Houston Chronicle,* http://www.chron.com/news/houston-texas/houston/article/Gas-company-funds-efforts-to-save-endangered-6711757.php). But there's no mention of the any results from any tracking of Ocelots using the collars in the Draft EIS. And Viva the Ocelot, Friends of Laguna Atascosa National Wildlife Refuge would strongly dispute Annova LNG's presentation of the Ocelot issues (www.facebook.com/VivatheOcelot/).

Another, lesser example of how money rules the company's actions: On 08-02-2018 Annova told FERC that "per internal discussions on cost benefits and project schedule impacts, Annova staff would recommend to its management not to pursue a TPC [Third Party Contractor] to review the fire protection design" of its LNG project. In other words, it wasn't willing out shell out the money to speed up the FERC permitting process. Looks like it's limping along while wanting the world to believe its speeding along. IND22-8

When it pinches pennies this way when it comes to its own best interest in speeding up the FERC permitting process, how can we trust it to not do environmental mitigation on the cheap as well? Putting things often, perhaps never getting around to do everything promised as good as promised?

Where the company says it has chosen to do something this way instead of that way to reduce environmental impacts, I believe that an independent evaluation is called for by someone who hasn't been influenced by the company's claims regarding which option has the lesser impact. And who also hasn't been influenced by Annova LNG Communications Manager Christina Pratt to statement to The Monitor that the company understands there are concerns about developments in our area and that the IND22-9

IND22-7 As noted in the draft EIS, the EIS was prepared by FERC staff, and statements and conclusions in the EIS represent the FERC's analysis unless specifically attributed to Annova.

IND22-8 Thank you for your comment.

IND22-9 This comment does not reference a specific plan, measure, or mitigation so it is not possible to provide a direct response.

company's going above and beyond to have as little impact on the environment as possible (The Monitor, 01-13-2019, https://www.themonitor.com/2019/01/13/giving-say-brownsville-lng-project/). And/or his statement to the the Port Isabel - South Padre Press that "We're actually doing a great deal more than the other facilities [Rio Grande LNG, Texas LNG] to mitigate impacts and actually proactively conserve some land and rebuild it" (01-17-2019 issue, pages 2 and 7). IND22-9 Cont'd

4) I believe that, on the basis of past inaccurate representations of facts, Annova LNG self-representations must be verified rather than taken at face value. IND22-10

I believe others will be making comments on how the company's proposed mitigation involving flooding the Little San Martin Lake planting black mangrove there etc.
Here I'll focus on an Annova LNG 11-02-2018 supplemental response to a FERC's 07-18-2018 data request regarding the pipeline from which Annova LNG's to receive its feedgass. Annova LNG states that it has already provided some of the requested information in two previous document submissions: "in the Application in Resource Report 1 at Section 1.12, Cumulative Impacts, Figure 1.12-3 – Anticipated Route of the Kingsville to Brownsville Pipeline, and the July 17, 2018 response to Data Request 5." But if you actually go to those two documents, you'll find they don't provide the information Annova LNG says they include.
See FERC's data request at http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20180627-3010 and the two documents Annova LNG cites at http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20160713-4004 and http://elibrary.ferc.gov/idmws/file_list.asp?accession_num=20170614-5048.
Annova LNG didn't provide the two document links to FERC. My guess is the company hoped nobody would take the time and effort to find them and look at them.

5) Due to Annova LNG's multiple stories about its feed source pipeline, I believe that its statement that it will be getting its feedgas from Enbridge's Valley Crossing pipeline should be verified with Enbridge/Valley Crossing up front in the permitting process. IND22-11
Originally, Annova said it would be getting its feedgas from a yet to be named 130 mile not less than 36-inch diameter pipeline. In August 2018, USACE timed out Annova's Section 404 application because it proved the name of the company that was to build, own, and operate the pipeline. In its 11-02-2018 supplemental response to FERC's 06-27-2018 data request Annova said, in part, that it was continuing to conduct commercial negotiations regarding the pipeline, was still prevented from providing the information requested by FERC by nondisclosure agreements, but would provide FERC with additional information as soon as it was able to do.

At one place, Annova referred to a lateral interconnect. Then it said it would have no lateral.

Then it submitted a second Section 404 application to USACE. The 130 mile feedgas pipeline disappeared from the table. Instead, Annova would be getting its feed gs from Valley Crossing – even thouth Valley Crossing stated 01-09-2017 that it wouldn't be providing any natural gas to any LNG operation. Annova submitted the application on behalf of a yet to be named company that would build, own, and operate a 6 or 8 mile lateral that would interconnect with the Valley Crossing Pipeline. Then we see in the 12-27-2018 USACE Public Notice regarding Annova LNG that Annova itself will be

IND22-10 The EIS represents FERC staff's independent review of the proposed Project. The review was conducted by an experienced interdisciplinary team that, as demonstrated by the issuance of hundreds of requests for additional data, performed its due diligence in vetting all information provided by the applicant. If the Commission authorizes the Project, Annova would be required to comply with all conditions of that authorization.

IND22-11 See response to comments IND13-1 and IND13-2.

build the lateral.

IND22-11 Cont'd

Importantly, the Texas LNG DEIS said that a compressor station would be constructed for the Valley Crossing Pipeline about half way between the Agua Dulce Hub and Brownsville to ad an estimated 50,000 hp of compression the the pipeline to supply Texas LNG's feedgas needs. The Texas DEIS doesn't say who's to build that compressor station. Annova mentions no such compressor station or additional compression relevant to Valley Crossing supplying its feedgas needs.

What are we to make of

1) all these shifts and changes in in Annova's pipeline plans,

2) Valley Crossing's 01-09-2017 statement that it wouldn't be providing any feedgas to any any LNG operation, and

3) Annova's failure to mention how Valley Crossing's suppose to provide the contracted volume of natural gas a) to its "anchor shipper" (primary customer, the Comisión Federal de Electricidad), b) to Texas LNG, and c) to Annova LNG?

The best start would seem to be: Confirm that Annova and Texas LNG have binding contracts with Valley Crossing. Then confirm that Valley Crossing can meet Annova's and Texas LNG's need for feedgas in addition to its contractual obligations to CFE. And only then proceed with the rest of the permitting process.

Thank you for your kind consideration of my comments. And good luck with getting Annova to comply honestly and in good faith with the permitting process.

– John Young, MS (Psychology), MSW (Social Work), Retired

San Benito TX
Member of SAVE RGV from LNG since May 2014

Regarding Next Decade's application for permit to build and operate an LNG liquefaction export facility (Annova LNG permit CP16-480-0000) on the Brownsville Ship Channel, I have grave concerns about the destruction of wildlife habitat on this site. I have personally visited the site, where several rare lomas exist, with rare vegetation, perfect habitat for the Texas Ocelot and other species. While there I photographed the vegetation on one of the lomas that sits directly in the way of destruction-for-construction of this gas liquefaction facility. I include a few of the photos I took on the site here, and I strongly urge that this rare habitat be left untouched by building construction or any other form of habitat destruction. Do not permit Annova LNG. IND23-01

IND23 Joyce Hamilton, page 1 of 2

IND23-1 Thank you for your comment. We assess the impact on lomas and related impact on ocelots in several sections of the EIS, including sections 4.5, 4.6, and 4.7. See also responses to comments IND9-14a and IND15-1.

ORIGINAL

From: First and last name: Elyas Browning
City: Austin
State: Texas
Zip Code: 78745
Date: Oct/21/19

TO:
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Annova LNG Docket No. CP16-480-000

I oppose the proposed Annova LNG project, hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND30-1

It is important to conserve resources and ensure that irreplaceable natural areas are not destroyed. I encourage you to consider long-term impacts over short-term gains. This pipeline will cause irreparable harm to people and the environment. IND30-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND30-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND30-4

SOCIOECONOMICS

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. IND30-5

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND30-6

CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND30-7

IND30 Elyas Browning, page 1 of 2

IND30-1 See response to comment IND20-1.

IND30-2 Thank you for your comment. Short and long-term environmental impacts are addressed in the EIS. There is no FERC-jurisdictional pipeline associated with the Annova Project and addressed in the EIS.

IND30-3 See response to comment IND20-2.

IND30-4 See response to comment IND20-3.

IND30-5 See response to comment IND20-4.

IND30-6 See response to comment IND20-5.

IND30-7 See response to comment IND20-6.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to. IND30-7 Cont'd

SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND30-8

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND30-9

PIPELINE

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG. IND30-10

WILDLIFE AND HABITAT

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND30-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND30-12

Thank you for your consideration of my concerns.

Elyse Browning

IND30 continued, page 2 of 2

IND30-8 See response to comment IND20-7.

IND30-9 See response to comment IND20-8.

IND30-10 See response to comment IND20-9.

IND30-11 See response to comment IND20-10.

IND30-12 See response to comment IND20-11.

ORIGINAL

From: First and last name: Victoria Hendricks
City: Austin
State: TX
Zip Code: 78757
Date: 1-21-2019

TO:
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: Annova LNG Docket No. CP16-480-000

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND31-1

Please don't endanger with Texas coast and our lives and economy by building these dangerous exports facilities.

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND31-2

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND31-3

SOCIOECONOMICS

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. IND31-4

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND31-5

CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND31-6

IND31 Victoria Hendricks, page 1 of 2

IND31-1 Thank you for your comment.

IND31-2 See response to comment IND20-2.

IND31-3 See response to comment IND20-3.

IND31-4 See response to comment IND20-4.

IND31-5 See response to comment IND20-5.

IND31-6 See response to comment IND20-5.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to. IND31-6 Cont'd

SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND31-7

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND31-8

PIPELINE

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG. IND31-9

WILDLIFE AND HABITAT

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND31-10

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND31-11

Thank you for your consideration of my concerns.

IND31 continued, page 2 of 2

IND31-7 See response to comment IND20-7.

IND31-8 See response to comment IND20-8.

IND31-9 See response to comment IND20-9.

IND31-10 See response to comment IND20-10.

IND31-11 See response to comment IND20-11.

David Fisher
Brownsville, TX

Re: Annova LNG Docket No. CP16-480-000

As a native Texan who takes our bays and waterways seriously, I am vehemently opposed to the LNG terminal. LNG proponents talked about energy independence and clean-burning fuels, but LNG terminals aimed at export do not support energy independence at all. Regulatory approval of the terminal is quite simply selling out locals and the environment for pure greed. Please put a stop to this destructive project! IND45-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000.

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND45-2

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND45-3

SOCIOECONOMICS IND45-4

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the IND45-5

IND45 David Fisher, page 1 of 3

IND45-1 Thank you for your comment.

IND45-2 See response to comment IND20-2.

IND45-3 See response to comment IND20-3.

IND45-4 See response to comment IND20-4.

IND45-5 See response to comment IND20-5.

economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND45-5

CULTURAL RESOURCES IND45-6

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND45-7

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND45-8

PIPELINE IND45-9

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND45 continued, page 2 of 3

IND45-6 See response to comment IND20-6.

IND45-7 See response to comment IND20-7.

IND45-8 See response to comment IND20-8.

IND45-9 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND45-10

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND45-11

IND45 continued, page 3 of 3

IND45-10 See response to comment IND20-10.

IND45-11 See response to comment IND20-11.

Elizabeth Pearl
South Padre Island, TX

Re: Annova LNG Docket No. CP16-480-000

Please help save and preserve the southern TX coast line. The damage once done, can't be reversed, it's all we have left on the Gulf Coast. More industry is NOT what we need or want. IND46-1

Re: Annova LNG Docket No. CP16-480-000

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND46-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND46-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND46-4

SOCIOECONOMICS IND46-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that IND46-6

IND46 Elizabeth Pearl, page 1 of 3

IND46-1 Thank you for your comment.

IND46-2 Thank you for your comment.

IND46-3 See response to comment IND20-2.

IND46-4 See response to comment IND20-3.

IND46-5 See response to comment IND20-4.

IND46-6 See response to comment IND20-5.

will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND46-6 Cont'd

CULTURAL RESOURCES IND46-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND46-8

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND46-9

PIPELINE

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG. IND46-10

IND46-7 See response to comment IND20-6.

IND46-8 See response to comment IND20-7.

IND46-9 See response to comment IND20-8.

IND46-10 See response to comment IND20-9.

WILDLIFE AND HABITAT

IND46-11

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas.

IND46-12

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy.

IND46-11 See response to comment IND20-10.

IND46-12 See response to comment IND20-11.

Ester H. Ybarra
Rio Hondo

Re: Annova LNG Docket No. CP16-480-000

Please do NOT let this permit be passed. I was born & raised here and love the nature that surrounds us. We are a unique area and want to keep it that way. For my children and grandchildren let us keep our safety as is. IND47-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000.

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND47-2

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND47-3

SOCIOECONOMICS IND47-4

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND47-5

IND47 Ester Ybarra, page 1 of 3

IND47-1 Thank you for your comment.

IND47-2 See response to comment IND20-2.

IND47-3 See response to comment IND20-3.

IND47-4 See response to comment IND20-4.

IND47-5 See response to comment IND20-5.

CULTURAL RESOURCES IND47-6

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND47-7

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND47-8

PIPELINE IND47-9

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT IND47-10

Lomas should not be destroyed as they provide an essential ecological functions and

IND47-6 See response to comment IND20-6.

IND47-7 See response to comment IND20-7.

IND47-8 See response to comment IND20-8.

IND47-9 See response to comment IND20-9.

IND47-10 See response to comment IND20-10.

cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND47-10 Cont'd

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND47-11

IND47-11 See response to comment IND20-11.

Gordon Watt
Brownsville, TX

Re: Annova LNG Docket No. CP16-480-000

In concert with the summary below, I would like to express my strong and long-standing opposition to the construction of this terminal. Annova has provided no compelling evidence that the construction of this terminal will have long-term benefits to the Rio Grande Valley – an area which is growing not due to energy-related industry but a diversifying and wide range of employment opportunities and a high quality of life. It is clear to me that the environmental damage to the area will result in irreversible harm to the many species of wildlife that live in or migrate through the region. Given that domestic and international tourism, and in particular eco-tourism (cycling, birding, and camping), is a large and growing component of the local economy, I stress in the strongest language possible my opposition to the construction of the terminal. IND48-1

Annova has not made a good-faith effort to be transparent with the community, to understand local concerns (they have not even engaged in the predominant local language!), or to research the impacts of the construction here. The RGV is simply a host to enrich Annova's profits and this pursuit will have negative effects on the environment and quality of life in the RGV. IND48-2

I strongly urge that permits for this project be denied. Any other outcome will be detrimental to the health and well-being of the people in this community and the fragile and diverse ecosystem we call home. IND48-3

–

I oppose the proposed Annova LNG project, hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000.

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND48-4

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial

IND48 Gordon Watt, page 1 of 3

IND48-1 Thank you for your comment.

IND48-2 Thank you for your comment. The EIS is FERC staff's evaluation of the potential environmental and socioeconomic impacts of the Annova Project.

IND48-3 Thank you for your comment.

IND48-4 See response to comment IND20-2.

government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public. IND48-4 Cont'd

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND48-5

SOCIOECONOMICS IND48-6

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND48-7

CULTURAL RESOURCES IND48-8

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND48-9

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for IND48-10

IND48 continued, page 2 of 3

IND48-5 See response to comment IND20-3.

IND48-6 See response to comment IND20-4.

IND48-7 See response to comment IND20-5.

IND48-8 See response to comment IND20-6.

IND48-9 See response to comment IND20-7.

IND48-10 See response to comment IND20-8.

LNG liquefaction, storage and transfer. IND48-10 Cont'd

PIPELINE

IND48-11

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND48-12

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas.

IND48-13

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy.

IND48-11 See response to comment IND20-9.

IND48-12 See response to comment IND20-10.

IND48-13 See response to comment IND20-11.

IND51 John Keller, page 1 of 3

John Keller
Los Fresnos, TX

Re: Annova LNG Docket No. CP16-480-000

I am a professional archaeologist residing within 15 miles box the proposed facility. There are a number of parts of the proposal that concern me. In general I find the EIS, at least the cultural resources documentation, to be grossly inadequate. To survey such a large area within the RGV using only shovel tests, and such a small number of those, is questionable. In my personal experience, which is well in excess of 30 years, shovel testing is antiquated, inefficient, and mistake prone. What is needed is large exposures with adequate opportunities for assessing subsurface features. Shovel tests do none of these things and frequently yield false results. To rely solely on such tests invalidates the entire premise of the operation. In my opinion the contractor did an in adequate job and should have none better. This reflects the fact that Annova did not hire a local contractor, with local knowledge and, indeed, made not attempt to do so. Certainly, I am well enough known, in the professional community to have been at least contacted and I was not. There are buried archaeological sites in the vicinity and the potential for deeply buried sites definitely does exists. Yet the contractor made no attempt to address the possibility borsch sites except to say that they were buried by intrusive fill. The presence of fill, in and of itself, is not an adequate reason to simply exclude such areas from further investigation and there are any number of recorded archaeological sites that reflect this. I have addressed only some of the cultural resource inadequacies that exist within the EIS but there are others. IND51-1

Furthermore, I find the comments form Save the RGV from Annova LNG quite pertinent. The permit is inadequate and the problems that exist within it require more information to allow approval. Send it back and have it redone adequately. IND51-2

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000.

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND51-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

IND51-1 Section 4.10.1.1 of the EIS summarizes the results of the archaeological survey, including review and comment by the SHPO (Texas Historical Commission). FERC staff have also reviewed the methodology and results of archaeological surveys and find them to be in accordance with standard protocols. The reference to the number of shovel tests in the EIS is specific to just a small portion of the site that was surveyed and was not the total number of shovel tests conducted for the Project.

IND51-2 Thank you for your comment. Annova's permit application is under review by FERC, and this EIS represents the NEPA analysis of potential impacts.

IND51-3 See response to comment IND20-2.

The public comment deadline should be extended. Because the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public. IND51-3 cont'd

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND51-4

SOCIOECONOMICS

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. IND51-5

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND51-6

CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND51-7

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND51-8

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which IND51-9

IND51-4 See response to comment IND20-3.

IND51-5 See response to comment IND20-4.

IND51-6 See response to comment IND20-5.

IND51-7 See response to comment IND20-6.

IND51-8 See response to comment IND20-7.

IND51-9 See response to comment IND20-8.

SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND51-9

PIPELINE IND51-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT IND51-11

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas.

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND51-12

IND51-10 See response to comment IND20-9.

IND51-11 See response to comment IND20-10.

IND51-12 See response to comment IND20-11.

Kent Wittenburg
Charlestown, MA

Re: Annova LNG Docket No. CP16-480-000

As a winter resident of Brownsville and SPI, I am deeply appreciative and concerned about the natural environment surrounding the Laguna Madre. I submit this comment regarding the proposed Annova LNG project.

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND55-1

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND55-2

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND55-3

SOCIOECONOMICS

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown. IND55-4

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND55-5

IND55 Kent Wittenburg, page 1 of 3

IND55-1 Thank you for your comment.

IND55-2 See response to comment IND20-2.

IND55-3 See response to comment IND20-3.

IND55-4 See response to comment IND20-4.

IND55-5 See response to comment IND20-5.

CULTURAL RESOURCES

IND55-6

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

IND55-7

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

IND55-8

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer.

PIPELINE

IND55-9

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND55-10

Lomas should not be destroyed as they provide an essential ecological functions and

IND55-6 See response to comment IND20-6.

IND55-7 See response to comment IND20-7.

IND55-8 See response to comment IND20-8.

IND55-9 See response to comment IND20-9.

IND55-10 See response to comment IND20-10.

cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND55-10 Cont'd

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND55-11

IND55-11 See response to comment IND20-11.

Laura Germany
Harlingen, TX

Re: Annova LNG Docket No. CP16-480-000

Please, we do NOT want this new Annova LNG terminal anywhere here in the Rio Grande Valley. It's adverse effects do not balance out with it's supposed benefits. The Valley is already exposed to enough toxicity via the maquiladora factories right next door in Mexico as well as insecticides and herbacides used heavily by the large farming community the land supports here. This land may not be appreciated by some, but the multi-million dollar industry of ecotourism that has built up in our region in the last several decades should indicate that is does have value to many people. IND56-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND56-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND56-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND56-4

SOCIOECONOMICS IND56-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not IND56-6

IND56 Laura Germany, page 1 of 3

IND56-1 Thank you for your comment.

IND56-2 Thank you for your comment.

IND56-3 See response to comment IND20-2.

IND56-4 See response to comment IND20-3.

IND56-5 See response to comment IND20-4.

IND56-6 See response to comment IND20-5.

include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND56-6 Cont'd

CULTURAL RESOURCES IND56-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND56-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND56-9

PIPELINE IND56-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

IND56 continued, page 2 of 3

IND56-7 See response to comment IND20-6.

IND56-8 See response to comment IND20-7.

IND56-9 See response to comment IND20-8.

IND56-10 See response to comment IND20-9.

WILDLIFE AND HABITAT

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND56-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND56-12

IND56 continued, page 3 of 3

IND56-11 See response to comment IND20-10.

IND56-12 See response to comment IND20-11.

Lessie Spindle
Waco, TX

Re: Annova LNG Docket No. CP16-480-000

Texas is my state, and has been for 88 years. Please stop destroying her. I grew up in the Texas oil fields. Ihave watched my family die of lung diseases and cancer. No more, don't contaminate new areas. The Ocelots, and the RGV and the children of Texas beg for life. IND59-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND59-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND59-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND59-4

SOCIOECONOMICS IND59-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in IND59-6

IND59 Lessie Spindle, page 1 of 3

IND59-1 Thank you for your comment.

IND59-2 Thank you for your comment.

IND59-3 See response to comment IND20-2.

IND59-4 See response to comment IND20-3.

IND59-5 See response to comment IND20-4.

IND59-6 See response to comment IND20-5.

response to climate change. IND59-6 Cont'd

CULTURAL RESOURCES IND59-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND59-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

IND59-9

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer.

PIPELINE IND59-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND59-7 See response to comment IND20-6.

IND59-8 See response to comment IND20-7.

IND59-9 See response to comment IND20-8.

IND59-10 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND59-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND59-12

IND59-11 See response to comment IND20-10.

IND59-12 See response to comment IND20-11.

Linda Cooke
Dallas, TX

Re: Annova LNG Docket No. CP16-480-000

There is no question that ocelots and many other species of animals (including humans) will be impacted by this pipeline and the LNG facilities it will serve. This is not just a "maybe." This is the reason environmental studies have been waived, to prevent those questions from being answered. IND60-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND60-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND60-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND60-4

SOCIOECONOMICS IND60-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in IND60-6

IND60 Linda Cooke, page 1 of 3

IND60-1 The potential impact on ocelots is evaluated in section 4.7.1.2 of the EIS. FERC staff is not aware of any environmental studies that have been waived. The status of environmental permits and agency consultations is summarized in section 1.5 of the EIS in table 1.5-1.

IND60-2 Thank you for your comment.

IND60-3 See response to comment IND20-2.

IND60-4 See response to comment IND20-3.

IND60-5 See response to comment IND20-4.

IND60-6 See response to comment IND20-5.

response to climate change. IND60-6 Cont'd

CULTURAL RESOURCES

IND60-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

IND60-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

IND60-9

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer.

PIPELINE

IND60-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND60-7 See response to comment IND20-6.

IND60-8 See response to comment IND20-7.

IND60-9 See response to comment IND20-8.

IND60-10 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND60-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND60-12

IND60-11 See response to comment IND20-10.

IND60-12 See response to comment IND20-11.

Michele Cole
San Antonio, TX

Re: Annova LNG Docket No. CP16-480-000

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND64-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND64-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND64-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND64-4

SOCIOECONOMICS IND64-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

IND64 Michele Cole, page 1 of 3

IND64-1 See response to comment IND20-11.

IND64-2 Thank you for your comment.

IND64-3 See response to comment IND20-2.

IND64-4 See response to comment IND20-3.

IND64-5 See response to comment IND20-4.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND64-6

CULTURAL RESOURCES IND64-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND64-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND64-9

PIPELINE IND64-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount

IND64-6 See response to comment IND20-5.

IND64-7 See response to comment IND20-6.

IND64-8 See response to comment IND20-7.

IND64-9 See response to comment IND20-8.

IND64-10 See response to comment IND20-9.

of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG. IND64-10 Cont'd

WILDLIFE AND HABITAT IND64-11

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas.

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND64-12

IND64-11 See response to comment IND20-10.

IND64-12 See response to comment IND20-11.

Mimi Calter
San Francisco, CA

Re: Annova LNG Docket No. CP16-480-000

As a birdwatcher, I've had the opportunity to spend time in the Rio Grand Valley, and to explore and enjoy it's remarkable natural habitat and diversity of wildlife. The area is a treasure, and deserves our respect and protection. IND65-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND65-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND65-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND65-4

SOCIOECONOMICS IND65-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND65-6

IND65 Mimi Calter, page 1 of 3

IND65-1 Thank you for your comment.

IND65-2 Thank you for your comment.

IND65-3 See response to comment IND20-2.

IND65-4 See response to comment IND20-3.

IND65-5 See response to comment IND20-4.

IND65-6 See response to comment IND20-5.

CULTURAL RESOURCES

IND65-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

IND65-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

IND65-9

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer.

PIPELINE

IND65-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND65-11

Lomas should not be destroyed as they provide an essential ecological functions and

IND65-7 See response to comment IND20-6.

IND65-8 See response to comment IND20-7.

IND65-9 See response to comment IND20-8.

IND65-10 See response to comment IND20-9.

IND65-11 See response to comment IND20-10.

cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND65-11 Cont'd

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IND65-12 See response to comment IND20-12.

Muhammad Rashid
McAllen, TX

Re: Annova LNG Docket No. CP16-480-000

This would come at the expense of endangering our wildlife, such as ocelots. Please don't do this. Let's work together to find renawable energy solutions that are profitable AND environmentally friendly. We're on this planet together. IND66-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND66-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND66-3

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SOCIOECONOMICS IND66-5

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The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND66-6

IND66 Muhammad Rashid, page 1 of 3

IND66-1 The potential impact on wildlife is evaluated in section 4.6 and ocelots in section 4.7.1.2 of the EIS. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND66-2 Thank you for your comment.

IND66-3 See response to comment IND20-2.

IND66-4 See response to comment IND20-3.

IND66-5 See response to comment IND20-4.

IND66-6 See response to comment IND20-5.

CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND66-7

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SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND66-8

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PIPELINE

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WILDLIFE AND HABITAT

Lomas should not be destroyed as they provide an essential ecological functions and IND66-11

IND66-7 See response to comment IND20-6.

IND66-8 See response to comment IND20-7.

IND66-9 See response to comment IND20-8.

IND66-10 See response to comment IND20-9.

IND66-11 See response to comment IND20-10.

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IND66-12 See response to comment IND20-11.

Ned Sheats
Mission, TX

Re: Annova LNG Docket No. CP16-480-000

There is a confusion here between the words need and want. A very few people need these facilities and thousands don't want them. Having spent a lot of my life near petroleum handling facilities I KNOW that the entire truth is not being made known about pollution, noise, safety and supposed benefits. In addition the pipelines and or other transport facilities will bring danger and polution to the entire Rio Grande Valley. IND67-1 IND67-2

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND67-3

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND67-4

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The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND67-5

SOCIOECONOMICS IND67-6

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The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the IND67-7

IND67 Ned Sheats, page 1 of 3

IND67-1 Thank you for your comment. With respect to Project need, see response to comment CO6-20.

IND67-2 The potential impact from pipelines or other transport facilities that are not part of the proposed Annova LNG Project are evaluated in the cumulative impacts assessment in section 4.13 of the EIS.

IND67-3 Thank you for your comment.

IND67-4 See response to comment IND20-2.

IND67-5 See response to comment IND20-3.

IND67-6 See response to comment IND20-4.

IND67-7 See response to comment IND20-5.

economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND67-7 Cont'd

CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND67-8

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SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND67-9

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND67-10

PIPELINE

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG. IND67-11

WILDLIFE AND HABITAT

IND67-8 See response to comment IND20-6.

IND67-9 See response to comment IND20-7.

IND67-10 See response to comment IND20-8.

IND67-11 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND67-12

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND67-13

IND67-12 See response to comment IND20-10.

IND67-13 See response to comment IND20-11.

Rachael Brown
Weslaco, TX

Re: Annova LNG Docket No. CP16-480-000

Today, Jan. 23, Elon Musk's rocket blew over, just a few miles from the proposed LNG site. If 'millionaire geniuses' can't keep a rocket upright during a little SouthTexas wind, what else has not been considered for these developments in this environmentally sensitive location? Please consider the VALUE of our wild places and if there is truly a need to put profit over our natural world. IND68-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND68-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND68-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

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SOCIOECONOMICS IND68-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the IND68-6

IND68 Rachael Brown, page 1 of 3

IND68-1 With respect to the analysis of potential risk associated with the SpaceX facility, see response to comment CO10-73. The intrinsic value of the environment that would be affected by the proposed Project is considered throughout the EIS. With respect to need, see response to comment CO6-20.

IND68-2 Thank you for your comment.

IND68-3 See response to comment IND20-2.

IND68-4 See response to comment IND20-3.

IND68-5 See response to comment IND20-4.

IND68-6 See response to comment IND20-5.

economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND68-6 Cont'd

CULTURAL RESOURCES IND68-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND68-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND68-9

PIPELINE IND68-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND68-7 See response to comment IND20-6.

IND68-8 See response to comment IND20-7.

IND68-9 See response to comment IND20-8.

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Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND68-11

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IND68-11 See response to comment IND20-10.

IND68-12 See response to comment IND20-11.

Sarah Simpson
Austion, TX

Re: Annova LNG Docket No. CP16-480-000

As both a Texan that believes in a future of renewable energy and someone that has lived and continues to spend time in the Rio Grande Valley, I urge you to deny permitting of fossil fuel energy infrastructure for the Annova LNG project. Help the US stop its addiction to carbon emitting energy and shift investment into other green alternatives. Prevent the destruction of the irreplaceable gulf coast natural lands. Thank you for your serious consideration of this issue. IND70-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND70-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND70-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND70-4

SOCIOECONOMICS IND70-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that IND70-6

IND70 Sarah Simpson, page 1 of 3

IND70-1 As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND70-2 Thank you for your comment.

IND70-3 See response to comment IND20-2.

IND70-4 See response to comment IND20-3.

IND70-5 See response to comment IND20-4.

IND70-6 See response to comment IND20-5.

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CULTURAL RESOURCES

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort. IND70-7

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SAFETY RISKS

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other. IND70-8

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IND70-7 See response to comment IND20-6.

IND70-8 See response to comment IND20-7.

IND70-9 See response to comment IND20-8.

IND70-10 See response to comment IND20-9.

WILDLIFE AND HABITAT

IND70-11

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas.

IND70-12

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy.

IND70-11 See response to comment IND20-10.

IND70-12 See response to comment IND20-11.

Scott Nicol
McAllen, TX

Re: Annova LNG Docket No. CP16-480-000

Schools in Port Isabel will be downwind from Annova LNG. Similar LNG facilities emit volatile organic compounds, mercury, particulates, and other pollutants into the air. The prevailing wind comes from the south, so these toxins will blow into the nearby elementary, junior high, and high school, where children, faculty, and staff will breathe them in day after day. IND71-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND71-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND71-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND71-4

SOCIOECONOMICS IND71-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the IND71-6

IND71 Scott Nicol, page 1 of 3

IND71-1 The estimated air emissions and ambient air quality modeling analysis from the Annova Project are addressed in section 4.11.1 of the EIS.

IND71-2 Thank you for your comment.

IND71-3 See response to comment IND20-2.

IND71-4 See response to comment IND20-3.

IND71-5 See response to comment IND20-4.

IND71-6 See response to comment IND20-5.

economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND71-6 Cont'd

CULTURAL RESOURCES IND71-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND71-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND71-9

PIPELINE IND71-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT IND71-11

IND71 continued, page 2 of 3

IND71-7 See response to comment IND20-6.

IND71-8 See response to comment IND20-7.

IND71-9 See response to comment IND20-8.

IND71-10 See response to comment IND20-9.

IND71-11 See response to comment IND20-10.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND71-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND71-12

IND71-12 See response to comment IND20-11.

Terence Garrett
Laguna Vista, TX

Re: Annova LNG Docket No. CP16-480-000

SpaceX yesterday had a rocket blow over due to high winds (46 MPH). What if it were loaded with fuel and it exploded within a few miles of an LNG Tanker and/or LNG refineries that are being proposed? This would cause a huge disaster, potentially killing thousands of people in the Laguna Madre area. It is unconscionable that you would allow this situation to exist. FERC approval will lead to disaster, deaths, and destruction. IND72-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND72-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND72-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND72-4

SOCIOECONOMICS IND72-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the IND72-6

IND72 Terence Garrett, page 1 of 3

IND72-1 See response to comment CO10-73.

IND72-2 Thank you for your comment.

IND72-3 See response to comment IND20-2.

IND72-4 See response to comment IND20-3.

IND72-5 See response to comment IND20-4.

IND72-6 See response to comment IND20-5.

economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND72-6 Cont'd

CULTURAL RESOURCES IND72-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND72-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND72-9

PIPELINE IND72-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND72-7 See response to comment IND20-6.

IND72-8 See response to comment IND20-7.

IND72-9 See response to comment IND20-8.

IND72-10 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND72-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND72-12

IND72 continued, page 3 of 3

IND72-11 See response to comment IND20-10.

IND72-12 See response to comment IND20-11.

Thomas Nieland
Alamo, TX

Re: Annova LNG Docket No. CP16-480-000

AnnovaLNG is proposing to site its plant precisely at a critical point where endangered ocelots are proved to have used to move from USA to Mexico or vice versa! This is totally unacceptable for enforcing the Endangered Species Act! IND73-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND73-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND73-3

The Draft Environmental Impact Statement is incomplete. There is a long list of important information that FERC is requesting from Annova "before the end of the comment period." How is the public supposed to comment on information that isn't there?

The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND73-4

SOCIOECONOMICS IND73-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in response to climate change. IND73-6

IND73 Thomas Nieland, page 1 of 3

IND73-1 See response to comment CO4-8.

IND73-2 Thank you for your comment.

IND73-3 See response to comment IND20-2.

IND73-4 See response to comment IND20-3.

IND73-5 See response to comment IND20-4.

IND73-6 See response to comment IND20-5.

CULTURAL RESOURCES

IND73-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS

IND73-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

IND73-9

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer.

PIPELINE

IND73-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND73-11

Lomas should not be destroyed as they provide an essential ecological functions and

IND73-7 See response to comment IND20-6.

IND73-8 See response to comment IND20-7.

IND73-9 See response to comment IND20-8.

IND73-10 See response to comment IND20-9.

IND73-11 See response to comment IND20-10.

cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND73-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND73-12

IND73-12 See response to comment IND20-11.

Victoria Scharen
Port Isabel, TX

Re: Annova LNG Docket No. CP16-480-000

We need to be focusing on this centuries clean renewable energy so I oppose any further dirty fossil fuel construction or development...this is a unique eco system that many organizations have worked hard to restore and should be not exploited or developed for any sort of industry. Thank you... IND74-1

I oppose the proposed Annova LNG project , hereinafter referred to as the Applicant. This project, as indicated in the DEIS, would have adverse impacts. The DEIS outlines impacts that outweigh claimed benefits, thus permits should be denied. The following comments are those specific to the DEIS and apply to docket No. CP16-480-000. IND74-2

DEIS AND FERC PROCEDURES ARE COMPROMISING PUBLIC INPUT IND74-3

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The public comment deadline should be extended. Because of the current partial government shutdown, most federal agencies are unable to review, comment or provide information to either FERC or the public.

The FERC DEIS is not available in Spanish, the predominant language spoken in the Rio Grande Valley. IND74-4

SOCIOECONOMICS IND74-5

The need for this project has not been demonstrated. There are no buyers for the LNG, no "binding contracts." For a project with so many negative impacts an unequivocal need for the product hasn't been shown.

The socioeconomic analysis in the DEIS is narrow in view and incomplete. It does not include the cost burden on the public for security, safety, and emergency response that will include our local police, fire, and medical services. Also not included is the economic costs associated with Annova's contribution to climate change and costs in IND74-6

IND74 Victoria Scharen, page 1 of 3

IND74-1 As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND74-2 Thank you for your comment.

IND74-3 See response to comment IND20-2.

IND74-4 See response to comment IND20-3.

IND74-5 See response to comment IND20-4.

IND74-6 See response to comment IND20-5.

response to climate change. IND74-6 Cont'd

CULTURAL RESOURCES IND74-7

Annova's archeological survey is inadequate. Concluding the absence of sites by sticking a shovel in the ground 36 times (shovel test, p. 4-151) is only a token effort.

Compliance with the National Historic Preservation Act should be completed and included in the EIS, not just done "prior to construction." Also, comments from the Carrizo-Comecrudo tribe should be included and responded to.

SAFETY RISKS IND74-8

The Annova site is 1/4 mile from the Rio Grande LNG site, which is within the Zone 1 thermal hazard zone (potentially most severe). LNG terminals should not be placed in so close proximity, to prevent the possibility of a catastrophe at one spreading to the other.

The SpaceX launch site at Boca Chica is 6 miles from the proposed Annova terminal site. Where is the launch failure analysis? Did that analysis include the SpaceX BFR, which will be larger than any existing rocket (and hence a larger debris field), and which SpaceX says it intends to launch from the Boca Chica site? That the entire Annova site, including access roads, is within the launch closure area makes the site unsuitable for LNG liquefaction, storage and transfer. IND74-9

PIPELINE IND74-10

FERC needs to address Annova's stated plan to obtain its gas from yet-to-be-constructed 9 mile 36-inch pipeline that will tap into the Valley Crossing Pipeline north of the BSC. Texas LNG proposes the same (a 30-inch pipeline). Valley Crossing is on public record saying they will not provide gas to LNG terminals. Furthermore, how could one 42-inch pipeline supply both terminals, and still provide gas to Mexico, which is the purpose for the pipeline being built? Agreements between Valley Crossing Pipeline and Annova LNG should be verified. Any change in the amount of gas and psi in the Valley Crossing should be reflected in the cumulative analysis in Annova LNG.

WILDLIFE AND HABITAT

IND74-7 See response to comment IND20-6.

IND74-8 See response to comment IND20-7.

IND74-9 See response to comment IND20-8.

IND74-10 See response to comment IND20-9.

Lomas should not be destroyed as they provide an essential ecological functions and cannot be be recreated or adequately mitigated for. The DEIS states (p. ES-5) "...we have determined that construction and operation of the Project would not significantly impact vegetation" and that "No forested vegetation will be affected by construction and operation of the Project" (p. 4-32). This is contradictory and is a false claim when taking into account the impact solely to lomas. IND74-11

A total of 18 species that are federally listed as threatened, endangered or proposed will be potentially affected by the Project. The DEIS states Annova will likely adversely affect the endangered ocelot and jaguarundi. Many other rare and important species will be impacted as well. Section 7 of the Endangered Species Act, as amended, states that any project authorized, funded, or conducted by any federal agencies should not "...jeopardize the continued existence of any endangered species or threatened species or result in the destruction or adverse modification of habitat of such species which is determined...to be critical...". The FWS Biological Opinion should precede FERC's final permitting decision, as the ocelot and jaguarundi may be in jeopardy. IND74-12

IND74 continued, page 3 of 3

IND74-11 See response to comment IND20-10.

IND74-12 See response to comment IND20-11.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is dangerous in all its phases. As a lifelong Texas resident, I never heard of earthquakes occurring in North Texas. Now they occur regularly. Why is the greed of the corporation more important than the health of the citizenry?? Fracking infrastructure in the beautiful natural areas of South Texas has been rejected by its citizens. Since when are their wishes not sufficient reason to desist? Stop this! IND77-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND77-02 IND77-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND77-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND77-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND77-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Carol Creech
clcreech72@flash.net
8013 Creek View Dr
North Richland Hills, TX 76180

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IND77 Carol Creech, page 1 of 1

IND77-1 With regard to fracking, see response to comment IND9-14.

IND77-2 See response to comment IND17-1.

IND77-3 See response to comment IND17-2.

IND77-4 See response to comment IND17-3.

IND77-5 See response to comment IND17-4.

IND77-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is dangerous and undercuts the earth. It causes earthquakes in non-earth quake areas. My friends have felt them near their home. IND78-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND78-02 IND78-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND78-04

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These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND78-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Nanette Gordon
flash963@att.net
4511 Silverthorn Dr
Mesquite, TX 75150

IND78 Nanette Gordon, page 1 of 1

IND78-1 See response to comment IND9-14.

IND78-2 See response to comment IND17-1.

IND78-3 See response to comment IND17-2.

IND78-4 See response to comment IND17-3.

IND78-5 See response to comment IND17-4.

IND78-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is causing earth-tremors, earth-quakes, sink-holes, and damaging our environment by poisoning the land and ground water! There is no need for any fracking for oil, now, or in the future! IND79-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND79-02 IND79-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND79-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND79-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND79-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Stanley Wright
hollow.oak.50@gmail.com
8018 County Road 606
Brownwood, TX 76801

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2019 FEB -4 P 4:12
FEDERAL ENERGY
REGULATORY COMMISSION

IND79 Stanley Wright, page 1 of 1

IND79-1 See response to comment IND9-14.

IND79-2 See response to comment IND17-1.

IND79-3 See response to comment IND17-2.

IND79-4 See response to comment IND17-3.

IND79-5 See response to comment IND17-4.

IND79-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is causing earthquakes which is causing the foundation of homes to be off structure. Ultimately, it's causing homeowners a lot more money than necessary. Fracking is not necessary and should be stopped. IND80-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND80-02 IND80-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND80-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND80-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND80-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Hageman
laura2005ali@yahoo.com
13608 Charcoal Ln
Dallas, TX 75234

IND80 Thomas R Smith, page 1 of 1

IND80-1 See response to comment IND9-14.

IND80-2 See response to comment IND17-1.

IND80-3 See response to comment IND17-2.

IND80-4 See response to comment IND17-3.

IND80-5 See response to comment IND17-4.

IND80-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is an unsafe technology. We need to be focusing on solar and wind energy, and developing better batteries. Leave this beautiful part of our state alone! Texas needs it's tourist industry in this area. IND81-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND81-02 IND81-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND81-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND81-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND81-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kathleen Kinzler
krmass@yahoo.com
9672 Longmont Dr
Houston, TX 77063

IND81 Kathleen Kinzler, page 1 of 1

IND81-1 With regard to fracking, see response to comment IND9-14. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND81-2 See response to comment IND17-1.

IND81-3 See response to comment IND17-2.

IND81-4 See response to comment IND17-3.

IND81-5 See response to comment IND17-4.

IND81-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking hurts everyone. It poisons the water. It destabilizes the geological substrates causing earthquakes. It perpetuates suicidal reliance on fossil fuels IND83-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND83-02 IND83-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND83-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND83-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND83-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

William Larowe
wclarowe@gmail.com
1006B Emerald Wood Drive
Austin, TX 78745

IND83 William Larowe, page 1 of 1

IND83-1 See response to comment IND9-14.

IND83-2 See response to comment IND17-1.

IND83-3 See response to comment IND17-2.

IND83-4 See response to comment IND17-3.

IND83-5 See response to comment IND17-4.

IND83-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking, and these projects in particular, pose an imminent threat to people, the environment, and local businesses. I am asking you to NOT approve these projects and others like them around the United States. IND84-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND84-02 IND84-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND84-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND84-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND84-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

David Larsen
davidelarsen51@gmail.com
4305 Rolling Water Dr
Pflugerville, TX 78660

IND84 David Larsen, page 1 of 1

IND84-1 See response to comment IND9-14.

IND84-2 See response to comment IND17-1.

IND84-3 See response to comment IND17-2.

IND84-4 See response to comment IND17-3.

IND84-5 See response to comment IND17-4.

IND84-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking will threaten families living along the pipeline. So many other countries have uncovered some scary stats about how fracking is harmful to local environments and economies. In our family, we stand for a fracking-free Texas! IND85-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND85-02 IND85-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND85-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND85-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND85-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Olivia Brown
oliviaclare@gmail.com
1127 Ebert Ave
Austin, TX 78721

FILED
SECRETARY OF THE
COMMISSION
2018 FEB -4 P 4:13
FEDERAL ENERGY
REGULATORY COMMISSION

IND85 Olivia Brown, page 1 of 1

IND85-1 See response to comment IND9-14.

IND85-2 See response to comment IND17-1.

IND85-3 See response to comment IND17-2.

IND85-4 See response to comment IND17-3.

IND85-5 See response to comment IND17-4.

IND85-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

All Americans deserve healthy environments. Greed does not Trump basic rights to a healthy environment IND86-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND86-02 IND86-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND86-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND86-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND86-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kathryn Cain
kathryn.cain@outlook.com
2 Fir Ct
Belton, TX 76513

2016 Feb 4

IND86 Kathryn Cain, page 1 of 1

IND86-1 Thank you for your comment.

IND86-2 See response to comment IND17-1.

IND86-3 See response to comment IND17-2.

IND86-4 See response to comment IND17-3.

IND86-5 See response to comment IND17-4.

IND86-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Air quality is declining for many of us in south and west Texas. Please block these export projects. IND87-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND87-02 IND87-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND87-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND87-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND87-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Stuart Crane
scranemd@yahoo.com
404 Texas Oak Dr
Alpine, TX 79830

IND87 Stuart Crane, page 1 of 1

IND87-1 Comment noted. Estimated air quality impacts from the Annova Project is addressed in section 4.11.1 and cumulative air quality impact is addressed in section 4.13.3.9.

IND87-2 See response to comment IND17-1.

IND87-3 See response to comment IND17-2.

IND87-4 See response to comment IND17-3.

IND87-5 See response to comment IND17-4.

IND87-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Air pollution, due to fracking (and other causes), can harm the health of many individuals, especially those who already suffer with respiratory illnesses. IND88-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND88-02 IND88-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND88-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND88-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND88-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Anna George
ourhope2000@yahoo.com
2330 Cool Springs Lane
Sugar Land, TX 77498

IND88 Anna George, page 1 of 1

IND88-1 See response to comment IND9-14.

IND88-2 See response to comment IND17-1.

IND88-3 See response to comment IND17-2.

IND88-4 See response to comment IND17-3.

IND88-5 See response to comment IND17-4.

IND88-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Air pollution is a huge risk for people like me. I don't want the eastern RGV to suffer from worsening environmental standards in exchange for short-term economic gains. IND89-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND89-02 IND89-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND89-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND89-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND89-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Thomas Garcia
thomas.garcia09@gmail.com
313 W. Eller Ave.
Pharr, TX 78577

IND89 Thomas Garcia, page 1 of 1

IND89-1 Comment noted. Estimated air quality impacts from the Annova Project is addressed in section 4.11.1 and cumulative air quality impact is addressed in section 4.13.3.9.

IND89-2 See response to comment IND17-1.

IND89-3 See response to comment IND17-2.

IND89-4 See response to comment IND17-3.

IND89-5 See response to comment IND17-4.

IND89-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Action to stop global warming requires a quick transition away from fossil fuels, meaning these projects will be for very short term profit while causing permanent damage to South Texas. I have visited These parts of Texas and seen the birds and wildlife areas that will be destroyed by these projects. I urge you to reject these projects that will continue to heat up our world to disastrous levels. These projects themselves lie in the direct path of severe storm events that will be worsened by the projects themselves. There is NO MORAL way to justify these unnecessary and environmentally destructive projects. IND90-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND90-02 IND90-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND90-04 IND90-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND90-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Terry Burns
tbscpbsc@satx.rr.com
13139 Vista Del Mundo
San Antonio, TX 78216

IND90 Terry Burns, page 1 of 1

IND90-1 Thank you for your comment. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND90-2 See response to comment IND17-1.

IND90-3 See response to comment IND17-2.

IND90-4 See response to comment IND17-3.

IND90-5 See response to comment IND17-4.

IND90-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

A majority of my family lives in the Rio Grande Valley of Texas, and would be directly impacted by this. The documented health issues, as well as the environmental issues, should not be taken lightly. These issues should be put above corporate interests and greed. IND91-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND91-02 IND91-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND91-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND91-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND91-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Emily Garza
emoshortz@gmail.com
3804 Bristol Motor Pass
Austin, TX 78728

2019 Feb 4

IND91 Emily Garza, page 1 of 1

IND91-1 Thank you for your comment.

IND91-2 See response to comment IND17-1.

IND91-3 See response to comment IND17-2.

IND91-4 See response to comment IND17-3.

IND91-5 See response to comment IND17-4.

IND91-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

"But man is a part of nature, and his war against nature is inevitably a war against himself."
~Rachel Carson IND92-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND92-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND92-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista,
which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG IND92-04
resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would
increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change.
The terminals would also demand a massive pipeline network, and threaten families living along the IND92-05
pipeline route with leaks, spills, and pipeline explosions.

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries.
Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND92-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Juli Kring
julii3@aol.com
12400 Brookglade Cir
Houston, TX 77099

IND92 Juli Kring, page 1 of 1

IND92-1 Thank you for your comment.

IND92-2 See response to comment IND17-1.

IND92-3 See response to comment IND17-2.

IND92-4 See response to comment IND17-3.

IND92-5 See response to comment IND17-4.

IND92-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a 60 year resident of Texas, I am very much opposed to these projects!The fracking process itself has proven its potential to create many environmental problems. The geology of Texas lends itself to such problems. Climate change and the need to transition to renewable energy sources would not be helped by such projects. Texans love their beautiful coastline. Please do NOT put Texans (and the environment) at such unnecessary risk! IND93-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND93-02 IND93-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND93-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND93-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND93-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Zeoma Olszewski
z.olszewski@sbcglobal.net
9526 Roanoke Dr
El Paso, TX 79924

IND93 Zeoma Olszewski, page 1 of 1

IND93-1 With regard to fracking, see response to comment IND9-14. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND93-2 See response to comment IND17-1.

IND93-3 See response to comment IND17-2.

IND93-4 See response to comment IND17-3.

IND93-5 See response to comment IND17-4.

IND93-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texas coast resident, I am desperate to preserve our precious ecology and coastal waters. Both the ecosystem and economy are at risk. IND94-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND94-02 IND94-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND94-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND94-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND94-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Melinda Fritsch
fritschmt@yahoo.com
222 S Whitney St
Aransas Pass, TX 78336

IND94 Melinda Fritsch, page 1 of 1

IND94-1 Thank you for your comment.

IND94-2 See response to comment IND17-1.

IND94-3 See response to comment IND17-2.

IND94-4 See response to comment IND17-3.

IND94-5 See response to comment IND17-4.

IND94-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texan, I am opposed to Rio Grande LNG, Texas LNG, and Annova LNG -- and the Rio Bravo Pipeline. These projects mean disruption and the uprooting of a historically and contemporarily marginalized people. IND95-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND95-02 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND95-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND95-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND95-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND95-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ashley Jones
ashleycamillestj13@gmail.com
6000 Reims Rd
Houston, TX 77036

IND95 Ashley Jones, page 1 of 1

IND95-1 Thank you for your comment.

IND95-2 See response to comment IND17-1.

IND95-3 See response to comment IND17-2.

IND95-4 See response to comment IND17-3.

IND95-5 See response to comment IND17-4.

IND95-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texan I say No Way we need to be protecting the land here in Texas. No more abuse IND96-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND96-02 IND96-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND96-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND96-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND96-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Betty Mcdugald
brmc1225@yahoo.com
7457 Willis Ave
Fort Worth, TX 76116

IND96 Betty Mcdugald, page 1 of 1

IND96-1 Thank you for your comment.

IND96-2 See response to comment IND17-1.

IND96-3 See response to comment IND17-2.

IND96-4 See response to comment IND17-3.

IND96-5 See response to comment IND17-4.

IND96-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a south Texan I object to to the destruction of our environment for profit. IND97-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND97-02 IND97-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND97-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND97-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND97-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Charlton
lmcharlton@aol.com
1001 W Magnolia Ave
San Antonio, TX 78201

IND97 Linda Charlton, page 1 of 1

IND97-1 Thank you for your comment.

IND97-2 See response to comment IND17-1.

IND97-3 See response to comment IND17-2.

IND97-4 See response to comment IND17-3.

IND97-5 See response to comment IND17-4.

IND97-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a resident of the area, I say **NO** to this plan that will damage local ecology and tourism and fishing and shrimping. NO, NO, NO!!! IND98-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND98-02 IND98-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND98-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND98-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND98-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ruth Keitz
keitzra@gmail.com
32304 Edgewater Isle Dr
Los Fresnos, TX 78566

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SECRETARY OF THE
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2017 FEB -4 P 4:08
FEDERAL ENERGY
REGULATORY COMMISSION

IND98 Ruth Keitz, page 1 of 1

IND98-1 Thank you for your comment. See assessment of potential impacts from the Annova Project on ecology in sections 4.4 through 4.7, and tourism and fishing in sections 4.8 and 4.9 of the EIS.

IND98-2 See response to comment IND17-1.

IND98-3 See response to comment IND17-2.

IND98-4 See response to comment IND17-3.

IND98-5 See response to comment IND17-4.

IND98-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a resident of Texas I want to do whatever I can to protect the land I call home. No amount of money is worth sacrificing the environment we live in. I strongly disagree with fracking and believe the world needs to become 100% reliable on renewable energy. IND99-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND99-02 IND99-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND99-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND99-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND99-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Christian Rodriguez
christian.rodriguez2121@yahoo.com
700 Clover Lane
Keller, TX 76248

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2019 FEB -4 P 4:08
FEDERAL ENERGY
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IND99 Christian Rodriguez, page 1 of 1

IND99-1 With regard to fracking, see response to comment IND9-14. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND99-2 See response to comment IND17-1.

IND99-3 See response to comment IND17-2.

IND99-4 See response to comment IND17-3.

IND99-5 See response to comment IND17-4.

IND99-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a native Texan and liver of our natural coast line communities, please consider the voice of Texans who live here not those who will profit elsewhere. IND100-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND100-02 IND100-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND100-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND100-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND100-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Brandy Gibbs
brandy.gibbs@att.net
4700 Mount Vernon Dr
Austin, TX 78745

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SECRETARY OF THE
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2019 FEB -4 P 4:08
FEDERAL ENERGY
REGULATORY COMMISSION

IND100 Brandy Gibbs, page 1 of 1

IND100-1 Thank you for your comment.

IND100-2 See response to comment IND17-1.

IND100-3 See response to comment IND17-2.

IND100-4 See response to comment IND17-3.

IND100-5 See response to comment IND17-4.

IND100-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a mother I want a land for my kids clean as I can give to them IND101-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND101-02 IND101-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND101-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND101-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND101-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Adriana Gonzalez
gota112272@gmail.com
2910 Pat Booker Rd Trlr 19
Universal City, TX 78148

IND101 Adriana Gonzaelz, page 1 of 1

IND101-1 Thank you for your comment.

IND101-2 See response to comment IND17-1.

IND101-3 See response to comment IND17-2.

IND101-4 See response to comment IND17-3.

IND101-5 See response to comment IND17-4.

IND101-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

All anybody thinks about is money in their pockets, what about the next generation. IND102-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND102-02 IND102-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND102-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND102-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND102-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Roberto Alvarado
albertsat207@yahoo.com
327 North Flores 204
San Antonio, TX 78205

IND102 Roberto Alvarado, page 1 of 1

IND102-1 Thank you for your comment.

IND102-2 See response to comment IND17-1.

IND102-3 See response to comment IND17-2.

IND102-4 See response to comment IND17-3.

IND102-5 See response to comment IND17-4.

IND102-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a mineral royalty owner and a retired oil industry professional, I know firsthand the environmental risks associated with these LNG export projects, and I'm happy to stand against them. IND103-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND103-02 IND103-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND103-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND103-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND103-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Greg Grubb
grubb.gp@gmail.com
2723 S Chilton Ave
Tyler, TX 75701

IND103 Greg Grubb, page 1 of 1

IND103-1 Thank you for your comment.

IND103-2 See response to comment IND17-1.

IND103-3 See response to comment IND17-2.

IND103-4 See response to comment IND17-3.

IND103-5 See response to comment IND17-4.

IND103-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a long-term beach bum, me and my family have been enjoying the Texas coasts for our whole life. Please do what you can to keep it pristine and enjoyable for all the families like mine. I have taught sooo many kiddo's to surf there, you would not believe it! And I could show you as well! IND104-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND104-02 IND104-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND104-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND104-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND104-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Doug Simmer
dougs@netway.net
4007 Avenue D Ste B
Austin, TX 78751

IND104 Doug Simmer, page 1 of 1

IND104-1 Thank you for your comment.

IND104-2 See response to comment IND17-1.

IND104-3 See response to comment IND17-2.

IND104-4 See response to comment IND17-3.

IND104-5 See response to comment IND17-4.

IND104-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a kid in the 60s my family would vacation at Galveston, but my mother hated it - there were oil blobs all over the beach, not only we would walk in oily sand, or in the water, the oil would swim around us in waves smearing us with tar. Eventually the beach was clean - I don't ever want to take my family to play in the watery oil. IND105-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND105-02 IND105-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND105-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND105-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND105-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Beth Ann Sikes
bethans56@yahoo.com
9205 Quail Field Dr
Austin, TX 78758

IND105 Beth Ann Sikes, page 1 of 1

IND105-1 Thank you for your comment.

IND105-2 See response to comment IND17-1.

IND105-3 See response to comment IND17-2.

IND105-4 See response to comment IND17-3.

IND105-5 See response to comment IND17-4.

IND104-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a former resident of Travis County, TX, I believe adding pipelines in South Texas wouldn't just affect those nearby citizens, but would affect a much larger population of Texas. I oppose these pipeline projects also as someone who has vacationed in South Padre Island and loves that coastline. Please rethink these projects for all the residents of Texas. IND106-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND106-02 IND106-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND06-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND106-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND106-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Natalie Martens
n.r.martens@gmail.com
8390 Park Ave
Forestville, CA 95436

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4:07
FEDERAL ENERGY
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IND106 Natalie Martens, page 1 of 1

IND106-1 Thank you for your comment. Note that the Annova Project does not include a FERC-jurisdictional pipeline.

IND106-2 See response to comment IND17-1.

IND106-3 See response to comment IND17-2.

IND106-4 See response to comment IND17-3.

IND106-5 See response to comment IND17-4.

IND106-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Doctoral student studying Biology, it is clear as day that extraction activities like these are detrimental to wildlife and this country's ever-shrinking natural areas. The fact that as a country we are focused on fracking rather than smarter, more progressive and environmentally-friendly energy technologies goes to show that the people in charge are not interested in the greater good, but in their own profits and fleeting personal gains. IND107-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND107-02 IND107-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND107-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND107-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND107-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Megan O'Connell
megan.oconnell235@gmail.com
1707 chicon st
Austin, TX 78702

IND107 Megan O'Connell, page 1 of 1

IND107-1 The Annova LNG Project does not include extraction activities. See also response to comment IND9-14.

IND107-2 See response to comment IND17-1.

IND107-3 See response to comment IND17-2.

IND107-4 See response to comment IND17-3.

IND107-5 See response to comment IND17-4.

IND107-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a coastal bend resident I NO to all fracking. Not in my neighborhood! IND108-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND108-02 IND108-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND108-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND108-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND108-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Samuel Boazman
samb39_2000@yahoo.com
2715 Morrow Dr
Corpus Christi, TX 78410

IND108 Samuel Bozeman, page 1 of 1

IND108-1 Thank you for your comment.

IND108-2 See response to comment IND17-1.

IND108-3 See response to comment IND17-2.

IND108-4 See response to comment IND17-3.

IND108-5 See response to comment IND17-4.

IND108-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not fold the beauty of Texas with pipelines! IND109-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND109-02 IND109-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND109-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND109-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND109-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Pam Sohan
gbsgirl4ever@aol.com
222 Autumn Chase
Pam, TX 78132

IND109 Pam Sohan, page 1 of 1

IND109-1 Thank you for your comment. Note that the Annova Project does not include a FERC-jurisdictional pipeline.

IND109-2 See response to comment IND17-1.

IND109-3 See response to comment IND17-2.

IND109-4 See response to comment IND17-3.

IND109-5 See response to comment IND17-4.

IND109-6 See response to comment IND17-5.

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

2019 Feb -4
2019 FEB -4 P 3:52

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The small island of South Padre won?t be able to withstand all the earthquakes that come along with fracking. IND110-01
This beautiful destination vacation spot and it?s tourism industry will be ruined. IND110-02 The birds and marine life will be threatened as well as the people. IND110-3 Texas has been torn up more than enough by fracking. I live in Dallas and I know firsthand. Please do not go ahead with this awful plan!
Thank you!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND110-04 would endanger communities across Texas, damage the local environment of South Texas, destroy IND110-05 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND110-06

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND110-07

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND110-08

For these reasons and many others, I am opposed to these projects.

Sincerely,

Patricia Stella
patriciajstella@gmail.com
6032 Daven Oaks Dr
Dallas, TX 75248

IND110 Patricia Stella, page 1 of 1

IND110-1 The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND110-2 See response to comment IND17-1.

IND110-3 See response to comment IND17-2.

IND110-4 See response to comment IND17-3.

IND110-5 See response to comment IND17-4.

IND110-6 See response to comment IND17-5.

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

2019 FEB -4 P 3:53

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND111-01 IND111-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND111-03

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and *Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive* pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND111-04

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. IND111-05

Sincerely,

Carolynn Snyder
snydercm@hotmail.com
9707 Big Geronimo St
San Antonio, TX 78254

IND111 Carolynn Snyder, page 1 of 1

IND111-1 Thank you for your comment. See the respective sections of the EIS for our assessment of potential impacts of the Annova Project, as well as cumulative impacts from the three proposed LNG projects, on local communities, cultural resources, and local industries.

IND111-2 See response to comment IND111-1.

IND111-3 Comment noted. We have addressed potential impacts on the local communities in the EIS. With regard to fracking, see response to comment IND9-14.

IND111-4 The proposed Annova LNG Project does not include a FERC-jurisdictional pipeline. See section 1.4.1 and 4.13 for our assessment of potential impact from the non-jurisdictional natural gas supply pipeline.

IND111-5 Thank you for your comment. The Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I oppose the construction of any and all Liquid Natural Gas plants proposed along the Texas Gulf Coast. Having lived in the Houston Port area, and seeing the pollution caused from the port up and down the Texas Coast, I am aware that no LNG plant is pollution free. Because I vacation in the Padre Island area and go birding along the shores of the Texas Gulf Coast, I believe no benefit will be derived from the construction of any plant except for greedy developers. IND114-01
Texas has always had an open shores policy, but such a development will stop Texans from enjoying an open coast. There are currently areas already closed to the public and most of these areas negatively impact the environment. It is time the destruction stops. IND114-02

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND114-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND114-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND114-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND114-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

David Will
dwill207@satx.rr.com
PO Box 312355
New Braunfels, TX 78131

IND114 David Will, page 1 of 1

IND114-1 Thank you for your comment.

IND114-2 See response to comment IND17-1.

IND114-3 See response to comment IND17-2.

IND114-4 See response to comment IND17-3.

IND114-5 See response to comment IND17-4.

IND114-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking and the pipelines that transport the products exclusively for the profit of the oil companies and seldom takes into account any damages to anything else must stop because it is a roller coaster into the end of our civilization where we have never ventured before and there's no way back if it's a mistake of judgment. Renewable energy is cheaper and cleaner and it's a proven fact. IND115-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy *Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.* IND115-02 IND115-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND115-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND115-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND115-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Gary Hild
gwaynehild@gmail.com
4845 Long Shadows Rd
Navasota, TX 77868

IND115 Gary Hild, page 1 of 1

IND115-1 Thank you for your comment. The Annova LNG Project does not include fracking. See also response to comment IND9-14. With regard to renewable energy, as stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND115-2 See response to comment IND17-1.

IND115-3 See response to comment IND17-2.

IND115-4 See response to comment IND17-3.

IND115-5 See response to comment IND17-4.

IND115-6 See response to comment IND17-5.

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

FILED
SECRETARY OF THE
COMMISSION

2019 FEB -4 P 3:54

FEDERAL ENERGY
REGULATORY COMMISSION

Subject: Comment on the proposed Port of Brownsville LNG expo[illegible] LNG (CP16-480-000).

Please save to earth for our children?s children. Fracking is not the answer. Plz work towards a sustainable future,
Thank you, jed mccuistion IND117-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND117-02 IND117-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND117-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND117-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND117-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jed Mccuistion
jedmcc@yahoo.com
2301 Wilma Rudolph Rd
Austin, TX 78748

IND117 Jed Mccuistion, page 1 of 1

IND117-1 Thank you for your comment. The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND117-2 See response to comment IND17-1.

IND117-3 See response to comment IND17-2.

IND117-4 See response to comment IND17-3.

IND117-5 See response to comment IND17-4.

IND117-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is no solution for the degrading world, only clean energy is. IND118-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND118-02 IND118-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND118-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND118-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND118-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Walter Breymann
wb@harleys.de
6200 Timberwolfe Ln
Fort Worth, TX 76135

IND118 Walter Breymann, page 1 of 1

IND118-1 Thank you for your comment. The Annova LNG Project does not include fracking. See also response to comment IND9-14. With regard to renewable energy, as stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND118-2 See response to comment IND17-1.

IND118-3 See response to comment IND17-2.

IND118-4 See response to comment IND17-3.

IND118-5 See response to comment IND17-4.

IND118-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

ENOUGH ALREADY!!!!! When do people and our right to clean air and water going to matter more than increasing billionaires bank accounts. We MUST take our state back and our rights. IND119-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND119-02 IND119-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND119-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND119-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND119-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Nelda Salinas
ljsalinas5@aol.com
7000 County Road 2004
Taft, TX 78390

FILED
SECRETARY OF THE
COMMISSION
2016 FEB -4 P 3:55
FEDERAL ENERGY
REGULATORY COMMISSION

IND119 Nelda Salinas, page 1 of 1

IND119-1 Thank you for your comment.

IND119-2 See response to comment IND17-1.

IND119-3 See response to comment IND17-2.

IND119-4 See response to comment IND17-3.

IND119-5 See response to comment IND17-4.

IND119-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Sirs:
I hope my pithy message reaches your hearts. Fracking, no matter what precautions, prompted rather by the companies' shareholders and environmentalist groups and citizens in general , Hurts the land and the waters and the subsoil. Greed, by the owners, CEOs of these companies needs to be turned into compassion and hope. Please pay attention to our plea: no more fracking in TExas or anywhere else in the US. Spain and Ireland did away with it because they understand fracking does violence to our earth - and we are all part of it. IND120-01
I am opposed to the Rio Grand LNG Export Terminal, the TExas LNG Expor Terminal, The Rio Bravo Pipeline and the Annova LNG.
Thank you.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND120-02 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND120-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND120-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND120-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND120-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Marta Diaz
martadiaz3@msn.com
11928 Jelicoe Dr
Houston, TX 77047

2016 FEB -4 P 3:55

IND120 Marta Diaz, page 1 of 1

IND120-1 Thank you for your comment. The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND120-2 See response to comment IND17-1.

IND120-3 See response to comment IND17-2.

IND120-4 See response to comment IND17-3.

IND120-5 See response to comment IND17-4.

IND120-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Trump's administration is the most corrupt, immoral, inhumane, unethical, destructive, Anti-American, insubordinate, & disgraceful liars. IND121-01
LOCK---THEM----UP!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND121-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND121-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND121-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND121-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Anita Cannata-Nowell
anitanowell@hotmail.com
203 S Bridge St
Jefferson, TX 75657

IND121 Anita Cannata-Nowell, page 1 of 1

IND121-1 Thank you for your comment.

IND121-2 See response to comment IND17-1.

IND121-3 See response to comment IND17-2.

IND121-4 See response to comment IND17-3.

IND121-5 See response to comment IND17-4.

IND121-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Use your brain - this shit is bad. IND122-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND122-02 IND122-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND122-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND122-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND122-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Allison Zborowski
allison.zborowski@gmail.com
12800 Turtle Rock Rd
Austin, TX 78729

IND122 Allison Zborowski, page 1 of 1

IND122-1 Thank you for your comment.

IND122-2 See response to comment IND17-1.

IND122-3 See response to comment IND17-2.

IND122-4 See response to comment IND17-3.

IND122-5 See response to comment IND17-4.

IND122-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am a native of Brownsville, Texas and I spent many a spring, summer and fall weekend at South Padre Island and surrounding areas. I am strongly opposed to destructive, polluting, and dangerous fracking on the island. It would be a tragic loss to Texas and particularly the residents, business owners, and the indigenous people who still value their culture and from whom these LNG terminals and fracking sites would take everything they depend upon and love. Please do not allow this horrible and regrettable use of this unique and precious south Texas area! IND123-01 IND123-02

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND123-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND123-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND123-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND123-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Mary Miller
chasnmary97@yahoo.com
5110 Alcott St
Dallas, TX 75206

IND123 Mary Miller, page 1 of 1

IND123-1 Thank you for your comment.

IND123-2 See response to comment IND17-1.

IND123-3 See response to comment IND17-2.

IND123-4 See response to comment IND17-3.

IND123-5 See response to comment IND17-4.

IND123-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

stop destroying the earth to line your pockets. using fracking and fossil fuels damages the earth and fuels climate change, destroying species - including humans. wealth means nothing when the earth is not viable for humans.
for God's sake be leaders, leaders of the free world and fix this terrible thing we have done. fossil fuels are part of our history - renewable energy is our future. IND124-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND124-02 IND124-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND124-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND124-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND124-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Deirdre Ohearn
d_ohearn@comcast.net
4504 Sunburst St
Bellaire, TX 77401

IND124 Deirdre Ohearn, page 1 of 1

IND124-1 Thank you for your comment.

IND124-2 See response to comment IND17-1.

IND124-3 See response to comment IND17-2.

IND124-4 See response to comment IND17-3.

IND124-5 See response to comment IND17-4.

IND124-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Cheney & his company Halliburton was able in 2005 to negotiate a special Congressional amendment to the Energy Legislation which prevented the EPA from regulating their Fracking Industry. "It stripped the Environmental Protection Agency of its authority to regulate a drilling process called hydraulic fracturing."
https://www.nytimes.com/2009/11/03/opinion/03tue3.html
Without that provision, Halliburton would not have been able to begin their Hydraulic Facturing, because of the Pollution caused to both Soil, Water, & Air.
Hydraulic Facturing has been found to cause serious damage to many community & personal wells - so bad as to to cause their closer. IND125-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND125-02 IND125-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND125-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND125-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND125-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Marj Sears
searssteve@aol.com
23215 Lidstone Point Ct
Katy, TX 77494

IND125 Marj Sears, page 1 of 1

IND125-1 Thank you for your comment.

IND125-2 See response to comment IND17-1.

IND125-3 See response to comment IND17-2.

IND125-4 See response to comment IND17-3.

IND125-5 See response to comment IND17-4.

IND125-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop the destruction of our planet! Each of the four proposed projects would damage the local environment of South Texas and more importantly harm small, local industries like mine and thousands of others, especially those in the shrimping, fishing and eco-tourism sectors. IND126-01
The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND126-02
These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community - there is no price that can be put on safety to our community, please don?t sell out on us!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND126-03
would endanger communities across Texas, damage the local environment of South Texas, destroy IND126-04
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND126-05

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. IND126-06
The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions.

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. IND126-07
Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

For these reasons and many others, I am opposed to these projects.

Sincerely,

Derek Eckert
derek.eckert@gmail.com
9200 Sandstone St
Austin, TX 78737

IND126 Derek Eckert, page 1 of 1

IND126-1 Thank you for your comment.

IND126-2 See response to comment IND17-1.

IND126-3 See response to comment IND17-2.

IND126-4 See response to comment IND17-3.

IND126-5 See response to comment IND17-4.

IND126-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The proposed pipeline projects and the LNG terminals for the the south Texas area is a disgusting plan. Texas has few areas of beaches that are clean and worthy of pride. Our wetlands for wildlife, and migrating birds is a nationwide attraction, as are the sea turtle sanctuaries and rescue habitats. Why should these unique areas of our state be changed into another ugly fossil fuel eyesore? We already have coastal refineries and ports, areas that equal those of Louisiana in industrial ugliness. There is more to the quality of a state than just jobs, there is the quality of its air, water, and scenery. Communities that enjoy their way of life and have pride that they are part of the beauty of this country. Please do not put anymore of our state in the crosshairs of a polluting industry from the last century. Texas is better than that. IND128-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND128-02 would endanger communities across Texas, damage the local environment of South Texas, destroy IND128-03 indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND128-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND128-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND128-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Barbara & Roby Odom
msodom@sbcglobal.net
6161 Preston Haven Dr
Dallas, TX 75230

IND128 Barbara & Roby Odom, page 1 of 1

IND128-1 Thank you for your comment.

IND128-2 See response to comment IND17-1.

IND128-3 See response to comment IND17-2.

IND128-4 See response to comment IND17-3.

IND128-5 See response to comment IND17-4.

IND128-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please dont bring another fracking project to the valley. These projects hurt people and the earth. Please don't put your paycheck before people's lives. That is greed. IND130-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND130-02 IND130-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND130-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND130-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND130-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Luis Zepeda
luisdemetriozepeda@gmail.com
1425 Acme Ln Apt 3
Edinburg, TX 78541

IND130 Luiz Zepeda, page 1 of 1

IND130-1 Thank you for your comment.

IND130-2 See response to comment IND17-1.

IND130-3 See response to comment IND17-2.

IND130-4 See response to comment IND17-3.

IND130-5 See response to comment IND17-4.

IND130-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

You have been repeatedly told why this is a bad idea that is only good for short term profit and long term pain. LNG is just another fossil fuel that needs to be phased out not encouraged. There exist plenty of transportation hubs to handle LNG until the world manages to do without this transitional form of dirty energy. IND131-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND131-02 IND131-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND131-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND131-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND131-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rick Provencio
rickproquo@yahoo.com
6213 Cadiz St
El Paso, TX 79912

IND131 Rick Provencio, page 1 of 1

IND131-1 Thank you for your comment.

IND131-2 See response to comment IND17-1.

IND131-3 See response to comment IND17-2.

IND131-4 See response to comment IND17-3.

IND131-5 See response to comment IND17-4.

IND131-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop the fracking. Don't destroy our beautiful coastline, affect our wildlife, threaten indigenous cultural sites and hurt local fishing. I am against all four of these projects. IND132-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND132-02 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND132-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND132-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND132-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND132-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Veronica Perez
ronnieperez82@gmail.com
218 Leigh St
San Antonio, TX 78210

IND132 Veronica Perez, page 1 of 1

IND132-1 Thank you for your comment.

IND132-2 See response to comment IND17-1.

IND132-3 See response to comment IND17-2.

IND132-4 See response to comment IND17-3.

IND132-5 See response to comment IND17-4.

IND132-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please do not construct export terminals for fracked LNG in South Texas. We need to invest in clean energy instead of continuing to damage our people and our lands with fossil fuel exploration, extraction and use. IND133-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND133-02 IND133-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND133-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND133-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND133-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Johnny Whitright
marleynataraj@yahoo.com
4368 Harvest Ln
Houston, TX 77004

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:56
FEDERAL ENERGY
REGULATORY COMMISSION

IND133 Johnny Whitright, page 1 of 1

IND133-1 Thank you for your comment.

IND133-2 See response to comment IND17-1.

IND133-3 See response to comment IND17-2.

IND133-4 See response to comment IND17-3.

IND133-5 See response to comment IND17-4.

IND133-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Greed and the total lack of respect for OUR Environment needs to stop NOW. Come together and save OUR Environment and Wildlife and if we ALL come together with some sane solutions we can SAVE ourselves at the same time. We ALL need to nurture OUR Nature in order for it to survive and thrive! IND134-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND134-02 IND134-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND134-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND134-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND134-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Tracey Bonner
tlb8@yahoo.com
1707 Castle Rd
Arlington, TX 76014

IND134 Tracey Bonner, page 1 of 1

IND134-1 Thank you for your comment.

IND134-2 See response to comment IND17-1.

IND134-3 See response to comment IND17-2.

IND134-4 See response to comment IND17-3.

IND134-5 See response to comment IND17-4.

IND134-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am horrified that the proposed fracking projects would introduce polluting flares and bulldozing the Padre Island beaches. These projects would seriously ruin the lives, homes and businesses of this beautiful and popular little town that attracts so many tourists to a natural area. IND135-01
Furthermore, it is wrong to bulldoze sovereign indigenous grounds. IND135-02
Pipelines are well known to rupture and sometimes explode. No communities should be exposed to such imminent and constant threat of danger. IND135-03
Please do not permit this to happen.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND135-04

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND135-05

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND135-06

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND135-07

For these reasons and many others, I am opposed to these projects.

Sincerely,

Susan Cooper
susan_jack@juno.com
1116 Greencove Ln
Richardson, TX 75081

IND135 Susan Cooper, page 1 of 1

IND135-1 Thank you for your comment.

IND135-2 See response to comment IND17-1.

IND135-3 See response to comment IND17-2.

IND135-4 See response to comment IND17-3.

IND135-5 See response to comment IND17-4.

IND135-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The proposed actions of these corporations will adversely affect the sustainability of this area in the most serious manner. IND136-01
M. Tatum

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND136-02 IND136-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND136-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND136-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND136-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Margaret Tatum
mtatum@ktc.com
214 Wood Trl
Kerrville, TX 78028

IND136 Margaret Tatum, page 1 of 1

IND136-1 Thank you for your comment.

IND136-2 See response to comment IND17-1.

IND136-3 See response to comment IND17-2.

IND136-4 See response to comment IND17-3.

IND136-5 See response to comment IND17-4.

IND136-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

My family goes to South Padre Island to see the sand and water, and to fish. I don't think we'll be making any trips there to see fracking infrastructure. The amount of revenue the island (and the state) will lose will be more than substantial when this area is no longer a tourist paradise IND137-01
if these LNG operations are going to be allowed, then those corporations need to buy out everyone on the island, and also make restitution to everyone for future lost wages and emotional and physical trauma. Some things are irreplaceable. Don't be daft, people! Our remaining natural resources are to be protected at any cost, not despoiled!! IND137-02

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND137-03
indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND137-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND137-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND137-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Carol Creech
clcreech72@flash.net
8013 Creek View Dr
North Richland Hills, TX 76180

IND137 Carol Creech, page 1 of 1

IND137-1 Thank you for your comment.

IND137-2 See response to comment IND17-1.

IND137-3 See response to comment IND17-2.

IND137-4 See response to comment IND17-3.

IND137-5 See response to comment IND17-4.

IND137-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

How about more local control and input. THE STATE SHOUILD NOT BE LIMITING THE SAFETY AND HEALTH OF LOCAL COMMUNITIES... IND138-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND138-02 IND138-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND138-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND138-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND138-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jerry Mylius
j.mylius@sbcglobal.net
1702 Fawn Dr
Austin, TX 78741

IND138 Jerry Mylius, page 1 of 1

IND138-1 Thank you for your comment.

IND138-2 See response to comment IND17-1.

IND138-3 See response to comment IND17-2.

IND138-4 See response to comment IND17-3.

IND138-5 See response to comment IND17-4.

IND138-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. Also, after the earthquakes caused in Irving, Texas it is simply not worth the risk. IND139-01 IND139-02 IND139-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND139-04

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND139-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. IND139-06

Sincerely,

J Wells
autumnmoon68@yahoo.com
9828 County Road 744
Princeton, TX 75407

IND139 J. Wells, page 1 of 1

IND139-1 Thank you for your comment.

IND139-2 See response to comment IND17-1.

IND139-3 See response to comment IND17-2.

IND139-4 See response to comment IND17-3.

IND139-5 See response to comment IND17-4.

IND139-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We oppose to these LNG projects we LOVE our beach!! IND140-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND140-02 IND140-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND140-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND140-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND140-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Eunice Garza
egarza@marbran.com
1704 KERRIA
MISSION, TX 78504

IND140 Eunice Garza, page 1 of 1

IND140-1 Thank you for your comment.

IND140-2 See response to comment IND17-1.

IND140-3 See response to comment IND17-2.

IND140-4 See response to comment IND17-3.

IND140-5 See response to comment IND17-4.

IND140-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I have lived my whole life in Texas and most of that time have been a coastal resident. The very idea that Texas government would consider detroying our beautiful coastline for another buck in the government coffers is outrageous. This should not happen and the people of this state should have a voice in the decision. Marianne Vogt IND141-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND141-02 IND141-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND141-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND141-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND141-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Marianne & Stefan Vogt
vogtmar@aol.com
1102 Segundo Dr
Georgetown, TX 78628

IND141 Marianne & Stefan Vogt, page 1 of 1

IND141-1 Thank you for your comment.

IND141-2 See response to comment IND17-1.

IND141-3 See response to comment IND17-2.

IND141-4 See response to comment IND17-3.

IND141-5 See response to comment IND17-4.

IND141-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don?t destroy what is beautiful, don?t demolish a thriving tourist location for Texas, Don?t hurt our environment and place to live, and don?t mess with Texas! Take you fracking somewhere else. IND142-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND142-02 IND142-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND142-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND142-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND142-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Austin gray
ausgra1999@gmail.com
2241 E Walnut St
Seguin, TX 78155

IND142 Austin Gray, page 1 of 1

IND142-1 Thank you for your comment. The proposed Annova LNG Project does not include fracking.

IND142-2 See response to comment IND17-1.

IND142-3 See response to comment IND17-2.

IND142-4 See response to comment IND17-3.

IND142-5 See response to comment IND17-4.

IND142-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I'm against all four project. I believe the environmental impact studies were inadequate. Sincerely, Chris Nicolosi IND143-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND143-02 IND143-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND143-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND143-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND143-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Chris Nicolosi
ctnicolosi@sbcglobal.net
15006 Swanley Ct
Houston, TX 77062

IND143 Chris Nicolosi, page 1 of 1

IND143-1 Thank you for your comment. We disagree that the draft EIS for the Annova LNG project was inadequate. However, we have made a number of updates and added additional information in the final EIS in direct response to comments received on the draft EIS.

IND143-2 See response to comment IND17-1.

IND143-3 See response to comment IND17-2.

IND143-4 See response to comment IND17-3.

IND143-5 See response to comment IND17-4.

IND143-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop fracking, it is one of the worst ways we can fuel our world. By doing this we will be sacrificing out wild beautiful places, those places that make the earth what it is. The community is against it, the world is turning against it. We have better ways of powering out future and this is not it. We already have another way, Texas leads in wind energy, put the money there if we need more energy, but stop the fracking. IND144-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND144-02 IND144-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND144-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND144-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND144-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

payten maness
paytenmaness3939@gmail.com
2205 Roarunner Dr
Flower Mound, TX 75022

IND144 Payten Maness, page 1 of 1

IND144-1 The Annova LNG Project does not include fracking. With respect to use of wind power, as stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND144-2 See response to comment IND17-1.

IND144-3 See response to comment IND17-2.

IND144-4 See response to comment IND17-3.

IND144-5 See response to comment IND17-4.

IND144-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We must stop the use of fossil fuels and switch to clean energy sources. Do none of you have children? Please consider the real cost of the environmental damage, health problems, habitat loss,,, What kind of planet are we going to be left with? IND145-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND145-02 IND145-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND145-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND145-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND145-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Robert Perry
prryrbrt@yahoo.com
15970 US Highway 271
Tyler, TX 75708

IND145 Robert Perry, page 1 of 1

IND145-1 As stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. The potential environmental impacts, human health, and habitat loss from construction and operation of the Annova LNG Project are addressed in the EIS.

IND145-2 See response to comment IND17-1.

IND145-3 See response to comment IND17-2.

IND145-4 See response to comment IND17-3.

IND145-5 See response to comment IND17-4.

IND145-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking so close to Laguna Atascosa National Wildlife Refuge, and St Port Isabel's doorstep is irresponsible. IND146-01
Is the greed and need for power so strong? At the cost of our health and children's heritage?

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND146-02 IND146-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND146-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND146-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND146-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Neal Baron
nealbaron@gmail.com
PO Box 2327
Fredericksburg, TX 78624

IND146 Neal Baron, page 1 of 1

IND146-1 The proposed Annova LNG Project does not include fracking.

IND146-2 See response to comment IND17-1.

IND146-3 See response to comment IND17-2.

IND146-4 See response to comment IND17-3.

IND146-5 See response to comment IND17-4.

IND146-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Impacts are not well enough revealed. Until that happens these must not move forward. IND147-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND147-02 IND147-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND147-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND147-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND147-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Richard Walsh
rwalsh275@hotmail.com
3412 Hightimber Dr
Grapevine, TX 76051

IND147 Richard Walsh, page 1 of 1

IND147-1 We disagree that impacts are not well enough revealed in the EIS, and without providing specifics it's not possible to respond further. However, we have made a number of updates and added additional information in the final EIS in direct response to comments received on the draft EIS.

IND147-2 See response to comment IND17-1.

IND147-3 See response to comment IND17-2.

IND147-4 See response to comment IND17-3.

IND147-5 See response to comment IND17-4.

IND147-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

These evil greedy corporations have got to stop trespassing!!!! They just simply don?t know how to respect and not take what doesn?t belong to them. Their GREED has taken over and they simply don?t care who or what gets hurt in this evil process. They are not helping the only home that we all have!!! STOP YOUR EVIL GREED!!!!!! IND148-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND148-02 IND148-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND148-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND148-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND148-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Guadalupe Yanez
lupeyanez49@gmail.com
12484 Robert Dahl Dr
El Paso, TX 79938

IND148 Guadalupe Yanez, page 1 of 1

IND148-1 Thank you for your comment.

IND148-2 See response to comment IND17-1.

IND148-3 See response to comment IND17-2.

IND148-4 See response to comment IND17-3.

IND148-5 See response to comment IND17-4.

IND148-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking does not make sense!
If your interests are truly with the good of the people, why would you want it??
This issue is clear to those of us who suffer as a result of fracking... which is all of us, in the end. Stop making a fool of yourself! IND149-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND149-02
would endanger communities across Texas, damage the local environment of South Texas, destroy
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND149-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista,
which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG
resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND149-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would
increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change.
The terminals would also demand a massive pipeline network, and threaten families living along the
pipeline route with leaks, spills, and pipeline explosions. IND149-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries.
Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND149-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Diane Adams
dadams4862@yahoo.com
3101 Oakview Dr Apt 13
Temple, TX 76502

2015 FEB -4 P 3:56

IND149 Diane Adams, page 1 of 1

IND149-1 The proposed Annova LNG Project does not include fracking.

IND149-2 See response to comment IND17-1.

IND149-3 See response to comment IND17-2.

IND149-4 See response to comment IND17-3.

IND149-5 See response to comment IND17-4.

IND149-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of the fracking projects proposed in south Texas. Fracking is not good for the community, not good for our environment, and is not good for our health. Please think about the future for our children and grandchildren to leave an environment that is safe and not destroyed by corporate greed. IND150-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND150-02 IND150-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND150-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND150-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND150-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Pam Sonnen
phsonnen@aol.com
131 Village Path
Castroville, TX 78009

IND150 Pam Sonnen, page 1 of 1

IND150-1 The proposed Annova LNG Project does not include fracking.

IND150-2 See response to comment IND17-1.

IND150-3 See response to comment IND17-2.

IND150-4 See response to comment IND17-3.

IND150-5 See response to comment IND17-4.

IND150-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Humankind's continued reliance on fossil fuels will soon make this planet inhospitable to life, the current global ecosystem is crashing and burning, and humans are literally throwing gas on the fire. We may already be past the point of no return. We always take the least impactful predictions, even though they are always prove to be woefully short of the mark. IND151-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND151-02 IND151-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND151-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND151-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND151-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Charles Spencer
michael@veganspirit.com
404 Swaha Dr
Tioga, TX 76271

FILED
SECRETARY OF THE
COMMISSION
2017 FEB -4 P 3:55
FEDERAL ENERGY REGULATORY COMMISSION

IND151 Charles Spencer, page 1 of 1

IND151-1 Thank you for your comment.

IND151-2 See response to comment IND17-1.

IND151-3 See response to comment IND17-2.

IND151-4 See response to comment IND17-3.

IND151-5 See response to comment IND17-4.

IND151-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We need to get serious about climate change and these projects would only be another setback to improving air and land quality. IND153-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND153-02 IND153-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND153-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND153-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND153-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

John Willis
jbwillis63@gmail.com
2776 Skivue Dr
Argyle, TX 76226

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SECRETARY OF THE
COMMISSION
2017 FEB -4 P 3:58
FEDERAL ENERGY
REGULATORY COMMISSION

IND153 John Willis, page 1 of 1

IND153-1 Discussion of GHG and climate change can be found in section 4.13.3.9..

IND153-2 See response to comment IND17-1.

IND153-3 See response to comment IND17-2.

IND153-4 See response to comment IND17-3.

IND153-5 See response to comment IND17-4.

IND153-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

STOP destroying our communities!!!! IND154-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND154-02 IND154-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND154-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND154-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND154-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sandra Lira
sandralira0195@att.net
230 Lively Dr
San Antonio, TX 78213

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:58
FEDERAL ENERGY
REGULATORY COMMISSION

IND154 Sandra Lira, page 1 of 1

IND154-1 Thank you for your comment. The potential impact of the proposed Annova LNG Project on the local environment and communities is assessed in the EIS.

IND154-2 See response to comment IND17-1.

IND154-3 See response to comment IND17-2.

IND154-4 See response to comment IND17-3.

IND154-5 See response to comment IND17-4.

IND154-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to these four projects because of the destruction and pollution it can cause to our sacred mother earth and waters and how it can harm humans and the ecosystem. IND156-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND156-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND156-03

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND156-04 IND156-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND156-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Juan Tejeda
juantejeda@sbcglobal.net
302 Stratford Ct
San Antonio, TX 78223

IND156 Juan Tejada, page 1 of 1

IND156-1 Thank you for your comment. See the EIS for our evaluation of the potential impact of the Annova LNG Project on humans and the environment.

IND156-2 See response to comment IND17-1.

IND156-3 See response to comment IND17-2.

IND156-4 See response to comment IND17-3.

IND156-5 See response to comment IND17-4.

IND156-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The resources put into LNG projects would be better used in advancing carbon-neutral renewable energy projects. Now, as the impacts and consequences of climate change brought on by pumping carbon into the atmosphere are undeniable and urgent, these LNG pr IND161-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND161-02 IND161-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND161-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND161-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND161-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Joan Cunningham
epipolit@gmail.com
137 Katherine Ct, Unit 1
San Antonio, TX 78209

IND161 Joan Cunningham, page 1 of 1

IND161-1 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND161-2 See response to comment IND17-1.

IND161-3 See response to comment IND17-2.

IND161-4 See response to comment IND17-3.

IND161-5 See response to comment IND17-4.

IND161-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking has already been suspected of causing widespread chaos in ecosystems and the stability of the very ground we walk on. Please stop. IND164-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND164-02 IND164-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND164-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND164-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND164-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Danielle Ivie
danielle.ivie@gmail.com
3121 Windsor Rd
Carrollton, TX 75007

IND164 Danielle Ivie, page 1 of 1

IND164-1 The proposed Annova LNG Project does not include fracking.

IND164-2 See response to comment IND17-1.

IND164-3 See response to comment IND17-2.

IND164-4 See response to comment IND17-3.

IND164-5 See response to comment IND17-4.

IND164-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

If more LNG export capacity is needed, the existing LNG terminals should be expanded. We should preserve the environmentally sensitive parts of the beautiful Texas Gulf Coast for our children and grand-children. IND166-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND166-02 IND166-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND166-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND166-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND166-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Joe De Souza
3jdesouza@gmail.com
8110 Ranch Rd 2222 Apt# 96
Austin, TX 78730

IND166 Joy De Souza, page 1 of 1

IND166-1 An evaluation of using existing LNG terminals as an alternative to the proposed Project is included in section 3.3 of the EIS.

IND166-2 See response to comment IND17-1.

IND166-3 See response to comment IND17-2.

IND166-4 See response to comment IND17-3.

IND166-5 See response to comment IND17-4.

IND166-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The baby sea turtles released every summer,in this area mentioned,are an endangered species.It would be illegal to ruin this environment for many critical reasons.-Kathleen Green IND167-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND167-02 IND167-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND167-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND167-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND167-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Mary D. Cartwright
mdcartw@aol.com
1715 Norris Dr
Austin, TX 78704

IND167 Mary Cartwright, page 1 of 1

IND167-1 The potential impact of the Project on sea turtles and other endangered species is included in section 4.7 of the EIS.

IND167-2 See response to comment IND17-1.

IND167-3 See response to comment IND17-2.

IND167-4 See response to comment IND17-3.

IND167-5 See response to comment IND17-4.

IND167-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

From both the perspective of environment and the local people's rights, these project proposals should be shelved. It is very short-sighted to destroy the environment and local industries for fossil fuel exports. Let us learn from the wisdom of countries IND170-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND170-02 IND170-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND170-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND17-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND170-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Archana Purushotham
archana.mahadevan@gmail.com
6814 Bannon Trail
Sugar Land, TX 77479

IND170 Archana Purushotham, page 1 of 1

IND170-1 Thank you for your comment.

IND170-2 See response to comment IND17-1.

IND170-3 See response to comment IND17-2.

IND170-4 See response to comment IND17-3.

IND170-5 See response to comment IND17-4.

IND170-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

what in the world are you thinking ? if your grand children survive all that will b left to eat will be plastic,and the air will melt a rock? IND172-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND172-02 IND172-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND172-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND172-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND172-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

george duncan
g.duncan27@yahoo.com
pobox135
CRANFILLS GAP, TX 76637

IND172 George Duncan, page 1 of 1

IND172-1 Thank you for your comment.

IND172-2 See response to comment IND17-1.

IND172-3 See response to comment IND17-2.

IND172-4 See response to comment IND17-3.

IND172-5 See response to comment IND17-4.

IND172-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a native Texan and a lover of Port Isabel, Texas I am appalled that we would sacrifice such beautiful, pristine lands in America for the financial gain of corporations that serve foreign countries. It's just disgusting!! shame on you lawmakers!! shame IND173-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND173-02 IND173-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND173-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND173-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND173-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Neala Johnson
suburbandirtgirl@gmail.com
11080 Blackhawk Dr
Frisco, TX 75033

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 PM 12:00
FEDERAL ENERGY
REGULATORY COMMISSION

IND173 Neala Johnson, page 1 of 1

IND173-1 Thank you for your comment.

IND173-2 See response to comment IND17-1.

IND173-3 See response to comment IND17-2.

IND173-4 See response to comment IND17-3.

IND173-5 See response to comment IND17-4.

IND173-6 See response to comment IND17-5.

ORIGINAL

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking puts dangerous chemicals in our water table, land, and DOES CAUSE EARTHQUAKES. In Oklahoma the number of earthquakes corrolates to rise in fracking. It is a dangerous procedure that puts people's lives at risk in many ways, additionally we need to be transitioning away from fossil fuels for the sake of avoiding major climate catastrophic change. You are condemning my generation, im 23 years old, to live in a world burdened by catastrophic climate events, and if Puerto Rico is the standard for how our government will respond, you are condemning us to this fate and will offer no help. We MUST avoid climate change by NOT MOVING FORWARD with more fossil fuels, but we need to reorient our energy industry toward renewables, and you MUST protect public health by forbidding dangerous chemicals pumped into our water table and into our land poisoning the citizens of Texas. IND177-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they *would endanger communities across Texas, damage the local environment of South Texas, destroy* Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND177-2 IND177-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND177-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND177-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND177-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

mary tietjen
marytietjen95@gmail.com
5604 Southwest parkway
Austin, TX 78741

FILED
SECRETARY OF THE
COMMISSION
2018 FEB -4 P 4:13
Federal Energy
Regulatory Commission

IND177 Mary Tietjen, page 1 of 1

IND177-1 The proposed Annova LNG Project does not include fracking. As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND177-2 See response to comment IND17-1.

IND177-3 See response to comment IND17-2.

IND177-4 See response to comment IND17-3.

IND177-5 See response to comment IND17-4.

IND177-6 See response to comment IND17-5.

20190212-0010 FERC PDF (Unofficial) 02/12/2019

FEDERAL ENERGY REGULATORY COMMISSION COMMENT FORM

ANNOVA LNG BROWNSVILLE PROJECT (DOCKET NO. CP16-480-000)

Comments can be: (1) left with a FERC representative tonight; (2) mailed to the address below or (3) electronically filed[1].

Please send one copy referenced to Docket No. CP16-480-000 to the address below.

For Official Filing:

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

ORIGINAL

COMMENTS: (PLEASE PRINT) [*continue on back or attach an additional sheet if necessary*]

Hello there - My name is Bianca Acosta I travel frequently to South Padre Island, and surrounding areas. I enjoy the very unique scenery, and what the area has to offer. I enjoy fishing with my family ever since I was able to hold a rod. IND178-01

Please protect our natural habitat, as this would continues to grow. Don't take away what mother nature provided by replacing it with Liquefied Natural Gas Export Terminal. IND178-02

Commentor's Name and Mailing Address (*Please Print*)

Bianca Acosta
P.O BOX 337
Hargill TX. 78549

FILED
SECRETARY OF THE
COMMISSION
2019 FEB 12 A 11:09
FEDERAL ENERGY
REGULATORY COMMISSION

[1] The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at http://www.ferc.gov under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account". The Commission has staff available to assist you if needed at (866) 208-3676 or FercOnlineSupport@ferc.gov.

IND178 Bianca Acosta, page 1 of 1

IND178-1 The potential impacts on scenery and visual resources is evaluated in section 4.8.5 of the EIS.

IND178-2 The potential impact on recreational fishing is evaluated in section 4.8.3 of the EIS.

FEDERAL ENERGY REGULATORY COMMISSION COMMENT FORM
ANNOVA LNG BROWNSVILLE PROJECT (DOCKET NO. CP16-480-000)

Comments can be: (1) left with a FERC representative tonight; (2) mailed to the address below or (3) electronically filed[1].

Please send one copy referenced to Docket No. CP16-480-000 to the address below.

For Official Filing:

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

ORIGINAL

COMMENTS: (PLEASE PRINT) [*continue on back or attach an additional sheet if necessary*]

I don't agree with the ~~off~~ LNG Project. IND179-01
It is associated with numerous potential environmental hazards as well as pollution hazards, and health issues. Workers would IND179-02
also be in danger as explosions and bad weather are possible.

Commentor's Name and Mailing Address (*Please Print*)

Gabriela Treviño
P.O Box 1623
Santa Rosa, TX
78593

FILED
SECRETARY OF THE
COMMISSION
2019 FEB 12 A 11:06
FEDERAL ENERGY
REGULATORY COMMISSION

[1] The Commission strongly encourages electronic filing of any comments or interventions or protests to this proceeding. See 18 CFR 385.2001(a)(1)(iii) and the instructions on the Commission's web site at http://www.ferc.gov under the "e-Filing" link and the link to the User's Guide. Before you can file comments you will need to create a free account by clicking on "Login to File" and then "New User Account". The Commission has staff available to assist you if needed at (866) 208-3676 or FercOnlineSupport@ferc.gov.

IND179 Gabriela Trevino, page 1 of 1

IND179-1 The EIS evaluates potential environmental hazards that would result from construction and operation of the Project.

IND179-2 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is a very dangerous and harmful project not only for the area in which it takes place but for all the world, because it u ses water that can never be used again, therefor removing precious water from the world's water system. IND180-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND180-02 IND180-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND180-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND180-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND180-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Susan Cooper
susan_jack@juno.com
1116 Greencove Ln
Richardson, TX 75081

IND180 Susan Cooper, page 1 of 1

IND180-1 The proposed Annova LNG Project does not include fracking.

IND180-2 See response to comment IND17-1.

IND180-3 See response to comment IND17-2.

IND180-4 See response to comment IND17-3.

IND180-5 See response to comment IND17-4.

IND180-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The fracked gas pipeline & petrochemical industry are not needed for public necessity or convinced. These pipelines are for the benefit of private enterprise and thus any eminent domain proceeding in the siting of these for export pipelines shall reflect IND181-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND181-02 IND181-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND181-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND181-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND181-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Debra Johnson
debrastartech@gmail.com
PO Box 803
Wellborn, FL 32094

IND181 Debra Johnson, page 1 of 1

IND181-1 The proposed Annova LNG Project does not include fracking.

IND181-2 See response to comment IND17-1.

IND181-3 See response to comment IND17-2.

IND181-4 See response to comment IND17-3.

IND181-5 See response to comment IND17-4.

IND181-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We need to show that we care about citizens and what they care about personally for their homes, communities and us as a country and we DON'T want fracking ruining still untouched beautiful land and small businesses. IND183-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND183-02 IND183-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND183-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND183-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND183-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Amanda Kay
recklesswonderland@gmail.com
3020 Tanglebriar Dr
Pasadena, TX 77503

IND183 Amanda Kay, page 1 of 1

IND183-1 The proposed Annova LNG Project does not include fracking.

IND183-2 See response to comment IND17-1.

IND183-3 See response to comment IND17-2.

IND183-4 See response to comment IND17-3.

IND183-5 See response to comment IND17-4.

IND183-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No amount of so-called economic boost that LNG could possibly bring to the Valley would ever offset the potential harm to the delicate ecosystem of SPI, Laguna Vista and surrounding community. What are we leaving our children and future generations? IND185-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND185-02 would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND185-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND185-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND185-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND185-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cristela Sifuentez
cbsifuentez@gmail.com
2112 Westway Ave
McAllen, TX 78501

IND185 Cristela Sifuentez, page 1 of 1

IND185-1 Thank you for your comment.

IND185-2 See response to comment IND17-1.

IND185-3 See response to comment IND17-2.

IND185-4 See response to comment IND17-3.

IND185-5 See response to comment IND17-4.

IND185-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Our environment is the only one we've got. Spoiling it is not an option. We deserve to have protections which prevent destruction of our area. IND189-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND189-02 IND189-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND189-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND189-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND189-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Catherine Pleasants
cplibrary@aol.com
10214 Sagemark Dr
Houston, TX 77089

IND189 Catherine Pleasants, page 1 of 1

IND189-1 Thank you for your comment.

IND189-2 See response to comment IND17-1.

IND189-3 See response to comment IND17-2.

IND189-4 See response to comment IND17-3.

IND189-5 See response to comment IND17-4.

IND189-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

To me it's common sense to invest in renewable energy sources instead of fossil fuel infrastructure. sea level rise, which is already occurring, will negatively impact the very communities proposed to receive the terminals. This is a poor plan. Feel free IND191-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND191-02 would endanger communities across Texas, damage the local environment of South Texas, destroy IND191-03 indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND191-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND191-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND191-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

John Rath
jrfree49@yahoo.com
429 Terrace Dr
Richardson, TX 75081

IND191 John Rath, page 1 of 1

IND191-1 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND191-2 See response to comment IND17-1.

IND191-3 See response to comment IND17-2.

IND191-4 See response to comment IND17-3.

IND191-5 See response to comment IND17-4.

IND191-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop the destruction of MY PLANET!!! End Fracking NOW before It's too late for our generations to come to experience the natural world and the beauty it holds. Solar energy is the answer. IND198-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND198-02 IND198-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND198-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND198-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND198-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Amanda Mahfood
amandamahfood@gmail.com
232 Chrystal Ln
Ore City, TX 75683

IND198 Amanda Mahfood, page 1 of 1

IND198-1 The proposed Annova LNG Project does not include fracking.

IND198-2 See response to comment IND17-1.

IND198-3 See response to comment IND17-2.

IND198-4 See response to comment IND17-3.

IND198-5 See response to comment IND17-4.

IND198-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

In light of all the risks involved with these projects, to the people, the community, and the environment, there is no possible justification proceeding with them. IND199-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND199-02 IND199-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND199-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND199-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND199-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

David Carter
fslists@sbcglobal.net
781 Country Place Dr Apt 2024
Houston, TX 77079

IND199 David Carter, page 1 of 1

IND199-1 Thank you for your comment.

IND199-2 See response to comment IND17-1.

IND199-3 See response to comment IND17-2.

IND199-4 See response to comment IND17-3.

IND199-5 See response to comment IND17-4.

IND199-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please help preserve the future for our children and grandchildren. We still have time, but it is running out. IND203-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND203-02 IND203-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND203-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND203-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND203-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Marta Hubbard
martahubbard@gmail.com
3007 White Rock Drive
Austin, TX 78757

IND203 Marta Hubbard, page 1 of 1

IND203-1 Thank you for your comment.

IND203-2 See response to comment IND17-1.

IND203-3 See response to comment IND17-2.

IND203-4 See response to comment IND17-3.

IND203-5 See response to comment IND17-4.

IND203-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The recently released congressional report on the environment clearly defines that we need to reduce fossil fuel emissions. Theses proposals will only exasperate our situation. Please do not allow this to happen! IND204-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND204-02 IND204-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND204-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND204-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND204-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

William Hoenes
spibill@ymail.com
5906 Laguna Cir N
William, TX 78597

IND204 William Hoenes, page 1 of 1

IND204-1 Thank you for your comment.

IND204-2 See response to comment IND17-1.

IND204-3 See response to comment IND17-2.

IND204-4 See response to comment IND17-3.

IND204-5 See response to comment IND17-4.

IND204-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Protect the beauty and specialness of South Padre Island. Keep the oil and LNG industries out! IND209-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND209-02 IND209-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND209-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND209-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND209-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Catherine Milbourn
ctmilbourn@earthlink.net
325 Kennedy Ave
San Antonio, TX 78209

IND209 Catherine Milbourn, page 1 of 1

IND209-1 Thank you for your comment.

IND209-2 See response to comment IND17-1.

IND209-3 See response to comment IND17-2.

IND209-4 See response to comment IND17-3.

IND209-5 See response to comment IND17-4.

IND209-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

It is tragic to consider the destruction of the beautiful clean tourist attractions of South Padre Island, Port Isabel, Laguna Vista and surrounding areas by smelly noisy industrial development! IND210-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND210-02 IND210-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND210-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND210-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND210-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Carolyn Nieland
gamsscbn@yahoo.com
415 Oakwood Dr.
Alamo, TX 78516

IND210 Carolyn Nieland, page 1 of 1

IND210-1 The potential impact of the Project on tourism, including South Padre Island, Port Isabel, and Laguna Vista, is evaluated in sections 4.8 and 4.9 of the EIS.

IND210-2 See response to comment IND17-1.

IND210-3 See response to comment IND17-2.

IND210-4 See response to comment IND17-3.

IND210-5 See response to comment IND17-4.

IND210-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

It's idiocy to industrialize a beautiful natural area that's thriving as an attractive tourist resort! IND211-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND211-02 would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND211-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND211-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND211-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND211-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Tom Nieland
tln4dwild@yahoo.com
415 Oakwood Dr.
Alamo, TX 78516

IND211 Tom Nieland, page 1 of 1

IND211-1 The potential impact of the Project on tourism is evaluated in sections 4.8 and 4.9 of the EIS.

IND211-2 See response to comment IND17-1.

IND211-3 See response to comment IND17-2.

IND211-4 See response to comment IND17-3.

IND211-5 See response to comment IND17-4.

IND211-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I would prefer to stop all fracking in my state. As a seventh generation Texas, this ridiculous method of extraction is known to do much harm to the land being used. The thought of our coastlines being destroyed is sickening, so stop immediately. IND216-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND216-02 IND216-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND216-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND216-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND216-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rebecca Sims
rgsims@sbcglobal.net
4726 Woodside St
Houston, TX 77023

IND216 Rebecca Sims, page 1 of 1

IND216-1 The proposed Annova LNG Project does not include fracking.

IND216-2 See response to comment IND17-1.

IND216-3 See response to comment IND17-2.

IND216-4 See response to comment IND17-3.

IND216-5 See response to comment IND17-4.

IND216-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a native Texan, I couldn't bear to see the coastline of South Padre Island ruined or the South Texas shrimping industry harmed by the proposed LNG export terminal projects and pipelines. IND217-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND217-02 IND217-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND217-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND217-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND217-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Delaina Foster
wickeddel@yahoo.com
12402 Broken Arrow St
Houston, TX 77024

IND217 Delaina Foster, page 1 of 1

IND217-1 The potential impact on the regional shrimping industry is addressed in section 4.9.2.3 of the EIS. We have also updated the final EIS to include additional information on this topic since issuance of the draft EIS.

IND217-2 See response to comment IND17-1.

IND217-3 See response to comment IND17-2.

IND217-4 See response to comment IND17-3.

IND217-5 See response to comment IND17-4.

IND217-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Dear Sirs,
My husband and I are concerned citizens and write to you today to express our concern about the impacts the proposed liquefied natural gas pipelines and plants would have to our community, environment and wildlife habitat. We are both outdo IND219-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND219-02 IND219-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND219-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND219-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND219-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Maria Reyna-Gomez
reyna197@aol.com
3079 S Buckingham Ct
Brownsville, TX 78526

IND219 Maria Reya-Gomez, page 1 of 1

IND219-1 The potential impacts of the Annova LNG Project on the local communities and on the environment and wildlife habitats is evaluated in several sections of the EIS.

IND219-2 See response to comment IND17-1.

IND219-3 See response to comment IND17-2.

IND219-4 See response to comment IND17-3.

IND219-5 See response to comment IND17-4.

IND219-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Some year down the line it may be necessary for the US to frack gas for our use. But today we are willing to damage forever one of the best natural environment in our country for unnecessary profit. I hope we can realize our error before it's to late. IND221-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND221-02 IND221-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND221-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND221-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND221-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Virginia Downing
downing4744@gmail.com
4744 S Fm 1174
Bertram, TX 78605

IND221 Virginia Downing, page 1 of 1

IND221-1 The proposed Annova LNG Project does not include fracking.

IND221-2 See response to comment IND17-1.

IND221-3 See response to comment IND17-2.

IND221-4 See response to comment IND17-3.

IND221-5 See response to comment IND17-4.

IND221-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I oppose the LNG projects because of the negative impacts these type of plants have to the environment including the air quality. I don't want them in my community!!! IND223-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND223-02 IND223-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND223-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND223-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND223-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Santiago Gomez
geeeuagain@gmail.com
3079 S Buckingham Ct
Brownsville, TX 78526

IND223 Santiago Gomez, page 1 of 1

IND223-1 Thank you for your comment. See our assessment of potential impact on air quality in section 4.11.1 of the EIS.

IND223-2 See response to comment IND17-1.

IND223-3 See response to comment IND17-2.

IND223-4 See response to comment IND17-3.

IND223-5 See response to comment IND17-4.

IND223-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I AM OPPOSED TO CONTINUED FRACKING IN MY STATE OF TEXAS. PLEASE DO NOT SACRIFICE THE FUTURE OF MY CHILDREN AND GRANDCHILDREN! IND224-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND224-02 IND224-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND224-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND224-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND224-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Maria Anna Esparza
mesparza2007@gmail.com
5212 Ascot Ave
Spring Branch, TX 78070

IND224 Maria Anna Esparza, page 1 of 1

IND224-1 The proposed Annova LNG Project does not include fracking.

IND224-2 See response to comment IND17-1.

IND224-3 See response to comment IND17-2.

IND224-4 See response to comment IND17-3.

IND224-5 See response to comment IND17-4.

IND224-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We all breathe the same air. We are not a sacrifice zone. IND225-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND225-02 IND225-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND225-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND225-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND225-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Michael Chavez
manthonychavez@gmail.com
4200 W Mile 5 Road
Mission, TX 78574

IND225 Michael Chavez, page 1 of 1

IND225-1 Thank you for your comment.

IND225-2 See response to comment IND17-1.

IND225-3 See response to comment IND17-2.

IND225-4 See response to comment IND17-3.

IND225-5 See response to comment IND17-4.

IND225-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This liquefied natural gas, with today's tech, can be a thing of the past. Can't you see this poison won't last, it brings destruction to all in its path. All in its path? We're all in its path! Just do the math! Oh, You have? That's why you sit on stacks IND227-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND227-02 IND227-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND227-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND227-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND227-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rick Cruz
lmtrc85@live.com
1225 W Washington
Brownsville, TX 78520

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COMMISSION
2018 FEB -4 P 4:04
FEDERAL ENERGY
REGULATORY COMMISSION

IND227 Rick Cruz, page 1 of 1

IND227-1 Thank you for your comment.

IND227-2 See response to comment IND17-1.

IND227-3 See response to comment IND17-2.

IND227-4 See response to comment IND17-3.

IND227-5 See response to comment IND17-4.

IND227-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

DON'T SACRIFICE COMMUNITIES AND THEIR ACCESS TO CLEAN AIR AND WATER, TO CORPORATE GREED. PROTECT AMERICAN CITIZENS, AMERICAN FAMILIES IND228-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND228-02 IND228-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND228-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND228-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND228-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Becky Wharton
earth_madre@hotmail.com
515 lower red rock rd
bastrop, TX 78602

IND228 Becky Wharton, page 1 of 1

IND228-1 Thank you for your comment.

IND228-2 See response to comment IND17-1.

IND228-3 See response to comment IND17-2.

IND228-4 See response to comment IND17-3.

IND228-5 See response to comment IND17-4.

IND228-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please don't destroy our beloved Texas coastal areas which are home to hundreds of species of animals. IND232-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND232-02 IND232-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND232-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND232-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND232-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Chia Guillory
chiahats@gmail.com
1404 Cedar Ave
Austin, TX 78702

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4: 03
FEDERAL ENERGY
REGULATORY COMMISSION

IND232 Chia Guillory, page 1 of 1

IND232-1 Thank you for your comment. See section 4.6 for our evaluation of potential impact on wildlife from the proposed Annova LNG Project.

IND232-2 See response to comment IND17-1.

IND232-3 See response to comment IND17-2.

IND232-4 See response to comment IND17-3.

IND232-5 See response to comment IND17-4.

IND232-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am very much opposed to this absolutely dangerous prospect of fossil fuel pipelines, facilities, and anything to do with that industry in my backyard, RGV. IND236-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND236-02 IND236-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND236-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND236-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND236-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Noe Acevedo
noea27@hotmail.com
901 S. Kansas Ave.
Weslaco, TX 78596

IND236 Noe Acevedo, page 1 of 1

IND236-1 Thank you for your comment.

IND236-2 See response to comment IND17-1.

IND236-3 See response to comment IND17-2.

IND236-4 See response to comment IND17-3.

IND236-5 See response to comment IND17-4.

IND236-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

It's time to end our dangerous addiction to fossil fuels. Our children and grandchildren will curse our names if we do not take drastic action to combat climate change RIGHT NOW. Stopping these projects is a start. IND237-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND237-02 IND237-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND237-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND237-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND237-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Delysia Moore
delysia0548@yahoo.com
214 Triple Crown Run
San Marcos, TX 78666

IND237 Delysia Moore, page 1 of 1

IND237-1 Thank you for your comment. Discussion of GHG and climate change can be found in section 4.13.3.9.

IND237-2 See response to comment IND17-1.

IND237-3 See response to comment IND17-2.

IND237-4 See response to comment IND17-3.

IND237-5 See response to comment IND17-4.

IND237-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I personally believe that dependency on all forms of fossil fueles is harmful to the environment and therefore I oppose all four proposed projects. Instead, I think we ought to seek alternative energy sources--such as solar, wind, and others. Citizens Cli IND238-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND238-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND238-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND238-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND238-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND238-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Alfonso Saldana
alfonso.saldana23@gmail.com
361 Ciruela Ln.
Brownsville, TX 78521

IND238 Alfonso Saldana, page 1 of 1

IND238-1 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND238-2 See response to comment IND17-1.

IND238-3 See response to comment IND17-2.

IND238-4 See response to comment IND17-3.

IND238-5 See response to comment IND17-4.

IND238-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why must we destroy our pristine places for oil? South Padre Island is a treasure to all Texans. it has been a special place for my family since I was a child as it is surely for millions of other Texas families who across the state. All the communities IND239-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND239-02 IND239-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND239-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND239-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND239-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laurie Ward
laurie.l.ward@gmail.com
1806 Fairmount Ave
Fort Worth, TX 76110

IND239 Laurie Ward, page 1 of 1

IND239-1 Thank you for your comment.

IND239-2 See response to comment IND17-1.

IND239-3 See response to comment IND17-2.

IND239-4 See response to comment IND17-3.

IND239-5 See response to comment IND17-4.

IND239-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Eminent domain pipeline projects are destroying farm and ranch land all across Texas so they can get their overproduction to the coast to export. Our ranch land has been stolen using eminent domain. and the pipeline company has restricted our use of it. O IND241-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND241-02 indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND241-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND241-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND241-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND241-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cheryl Smith
smithcvs65@yahoo.com
509 CR 301
Gorman, TX 76454

IND241 Cheryl Smith, page 1 of 1

IND241-1 Thank you for your comment. The proposed Annova LNG Project does not include a pipeline.

IND241-2 See response to comment IND17-1.

IND241-3 See response to comment IND17-2.

IND241-4 See response to comment IND17-3.

IND241-5 See response to comment IND17-4.

IND241-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

These projects will destroy valuable wildlife habitat. IND243-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND243-02 IND243-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND243-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND243-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND243-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ken Dixon
kendixon9@gmail.com
120 Bel Air Loop
Graford, TX 76449

IND243 Ken Dixon, page 1 of 1

IND243-1 Thank you for your comment. See our assessment of impact on wildlife and wildlife habitat in sections 4.6 and 4.7 of the EIS.

IND243-2 See response to comment IND17-1.

IND243-3 See response to comment IND17-2.

IND243-4 See response to comment IND17-3.

IND243-5 See response to comment IND17-4.

IND243-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not destroy South Padre with this crap. IND244-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND244-02 IND244-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND244-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND244-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND244-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

John Hanson
pyrotarkus@gmail.com
1409 E Cesar Chavez St
Austin, TX 78702

IND244 John Hanson, page 1 of 1

IND244-1 Thank you for your comment.

IND244-2 See response to comment IND17-1.

IND244-3 See response to comment IND17-2.

IND244-4 See response to comment IND17-3.

IND244-5 See response to comment IND17-4.

IND244-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Living in the valley there really isn't much going on but on those good days going to island and enjoying the beach and the wildlife adds a little magic. To add those gas infrastructures at SPI well take all of that away and make going to the beach a haza IND250-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND250-02 would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND250-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND250-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND250-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND250-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Karli Scalise
karli.scalise@gmail.com
200 W Houston Ave
McAllen, TX 78501

2019 FEB -4 P 4:05

IND250 Karli Scalise, page 1 of 1

IND250-1 Thank you for your comment. Section 4.12 of the EIS evaluates the safety and reliability of the proposed Project.

IND250-2 See response to comment IND17-1.

IND250-3 See response to comment IND17-2.

IND250-4 See response to comment IND17-3.

IND250-5 See response to comment IND17-4.

IND250-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

WTFrack!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND251-01 IND251-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND251-03

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND251-04

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND251-05

For these reasons and many others, I am opposed to these projects.

Sincerely,

Robin Sherwin
robin_shrwn@yahoo.com
21 Mallard Road
Macomb, IL 61455

IND251 Robin Sherwin, page 1 of 1

IND251-1 See response to comment IND17-1.

IND251-2 See response to comment IND17-2.

IND251-3 See response to comment IND17-3.

IND251-4 See response to comment IND17-4.

IND251-5 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I live in Houston and I see enough oil and gas refineries , lets keep the South Padre Island a pristine vacation place that everyone wants to visit. IND254-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND254-02 IND254-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND254-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND254-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND254-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Michael Peterson
mgp05405@gmail.com
22715 Trailwood Ln
Tomball, TX 77375

IND254 Michael Peterson, page 1 of 1

IND254-1 Thank you for your comment.

IND254-2 See response to comment IND17-1.

IND254-3 See response to comment IND17-2.

IND254-4 See response to comment IND17-3.

IND254-5 See response to comment IND17-4.

IND254-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please ensure that our Texas coast remains a place for natural beauty, animal habitat, and a meaningful lifestyle for its residents. IND255-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND255-02 IND255-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND255-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND255-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND255-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ingrid Hansen
ingrid.hansen@rocketmail.com
5217 Old Spicewood Springs Rd.
Austin, TX 78731

IND255 Ingrid Hansen, page 1 of 1

IND255-1 Thank you for your comment.

IND255-2 See response to comment IND17-1.

IND255-3 See response to comment IND17-2.

IND255-4 See response to comment IND17-3.

IND255-5 See response to comment IND17-4.

IND255-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Apache blood runs in my veins, and although I was not EVEN born here in Texas, all the lands where my ancestors roamed and beyond are sacred to me. I still roam - from Michigan where I was born back here to San Antonio where I taught. Pollution and contamination of our land, water and air cannot continue. Profit is NOT the only indication of a successful society - People need healthy conditions in order to thrive. NO FRACKING! NO LNG! IND257-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND257-02 IND257-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND257-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND257-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND257-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Codina
lcodina@earthlink.net
2503 W. Summit Avenue
San Antonio, TX 78228

IND257 Laura Codina, page 1 of 1

IND257-1 Thank you for your comment.

IND257-2 See response to comment IND17-1.

IND257-3 See response to comment IND17-2.

IND257-4 See response to comment IND17-3.

IND257-5 See response to comment IND17-4.

IND257-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Another project by the "climate denier in chief" who does what his many monied people who support his debacle of a presidency IND258-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND258-02 IND258-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND258-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND258-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND258-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Eleanor Raybold
mzelli@yahoo.com
780 w. Bay area blvd#1316
Webster, TX 77598

IND258 Eleanor Raybold, page 1 of 1

IND258-1 Thank you for your comment.

IND258-2 See response to comment IND17-1.

IND258-3 See response to comment IND17-2.

IND258-4 See response to comment IND17-3.

IND258-5 See response to comment IND17-4.

IND258-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

An increase in seismic activity and pollution while tearing up more of our dwindling supply of countryside? The possibility of accident and the reality of climate change exacerbation? Are you serious? Good ideas? Zero. Bad ideas? Four out of four. IND259-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND259-02 IND259-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND259-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND259-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND259-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Denis Tidrick
dtidrick@satx.rr.com
92 Booker Palm
San Antonio, TX 78239

IND259 Denis Tidrick, page 1 of 1

IND259-1 Because of the reference to an increase in seismic activity we assume this comment is referring to the practice of fracking. The proposed Annova LNG Project does not include fracking.

IND259-2 See response to comment IND17-1.

IND259-3 See response to comment IND17-2.

IND259-4 See response to comment IND17-3.

IND259-5 See response to comment IND17-4.

IND259-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Also, as a Bird Watcher, I don't want to harm the area around Port Isabel. Any leaks, any explosions will create havoc on a Major migration path for millions and millions of birds. Do not build those plants there. IND260-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND260-02 IND260-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND260-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND260-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND260-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Karen Hill
scout.ktrh@gmail.com
217 Hill Drive
Coppell, TX 75019

IND260 Karen Hill, page 1 of 1

IND260-1 Thank you for your comment. Potential impact on migratory birds is addressed in section 4.6.1.2 of the EIS.

IND260-2 See response to comment IND17-1.

IND260-3 See response to comment IND17-2.

IND260-4 See response to comment IND17-3.

IND260-5 See response to comment IND17-4.

IND260-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

All we hold dear to our hearts will be at risk if we allow this fracking to take place. Protect what little natural beauty we have and leave our coast alone. IND261-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND261-02 IND261-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND261-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND261-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND261-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Shelley Dunham
dextress34@gmail.com
4913 Jo Ann St
Corpus Christi, TX 78415

IND261 Shelley Dunham, page 1 of 1

IND261-1 The proposed Annova LNG Project does not include fracking.

IND261-2 See response to comment IND17-1.

IND261-3 See response to comment IND17-2.

IND261-4 See response to comment IND17-3.

IND261-5 See response to comment IND17-4.

IND261-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

All efforts to increase the collection and refinement of fossil fuels should stop immediately and thebillionaires controlling the energy systems in our country shoul]dput their excessdollars to fund and distrbute renewable energy. IND262-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND262-02 IND262-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND262-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND262-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND262-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Frances Morgan
semdc2003@yahoo.fr
3014 Taylor Ave
El Paso, TX 79925

IND262 Frances Morgan, page 1 of 1

IND262-1 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND262-2 See response to comment IND17-1.

IND262-3 See response to comment IND17-2.

IND262-4 See response to comment IND17-3.

IND262-5 See response to comment IND17-4.

IND262-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking pollutes the air and water. IND263-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND263-2 IND263-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND263-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND263-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND263-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Craig Parker
craig_parker@att.net
4652 Park Bend Dr
Fort Worth, TX 76137

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FEDERAL ENERGY
REGULATORY COMMISSION

IND263 Craig Parker, page 1 of 1

IND263-1 The proposed Annova LNG Project does not include fracking.

IND263-2 See response to comment IND17-1.

IND263-3 See response to comment IND17-2.

IND263-4 See response to comment IND17-3.

IND263-5 See response to comment IND17-4.

IND263-6 See response to comment IND17-5.

ORIGINAL

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not do this to Texas! Money is not a good enough excuse for destroying our beautiful Texas land and communities. Texas people are not in favor of sacrificing our coastline, South Padre Island, our public health. Stop this now. IND264-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND264-02 IND264-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND264-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND264-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND264-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Martha Eberle
wildwoodsoftexas@texas-skies.com
2525 Mcgregor Lane
Dripping Springs, TX 78620

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4:09
FEDERAL ENERGY
REGULATORY COMMISSION

IND264 Martha Eberle, page 1 of 1

IND264-1 Thank you for your comment.

IND264-2 See response to comment IND17-1.

IND264-3 See response to comment IND17-2.

IND264-4 See response to comment IND17-3.

IND264-5 See response to comment IND17-4.

IND264-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not do it! This a horrible thing to do to such a beautiful place. IND265-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND265-02 IND265-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND265-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND265-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND265-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Isys Chamberlain
isysaft@gmail.com
626 Jeff Davis Dr
Richmond, TX 77469

IND265 Isys Chamberlain, page 1 of 1

IND265-1 Thank you for your comment.

IND265-2 See response to comment IND17-1.

IND265-3 See response to comment IND17-2.

IND265-4 See response to comment IND17-3.

IND265-5 See response to comment IND17-4.

IND265-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Destroying God's Creations is not in your job description but looking out for the earth's best interest (protecting Earth's natural resources and all of its beauty) to ensure that many generations yet to come can count on it being there for them. IND266-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy *indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.* IND266-02 IND266-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND266-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND266-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND266-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Tresa Colston
tresacolston776@yahoo.com
7026 Wurzbach Rd Apt 608
San Antonio, TX 78240

IND266 Tresa Colston, page 1 of 1

IND266-1 Thank you for your comment.

IND266-2 See response to comment IND17-1.

IND266-3 See response to comment IND17-2.

IND266-4 See response to comment IND17-3.

IND266-5 See response to comment IND17-4.

IND266-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Count me in supporting your campaign stop the proposed projects on the south texas Rio Bravo. IND267-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND267-02 IND267-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND267-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND267-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND267-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Andrew Hernandez
andrew.hernandezjr@gmail.com
1200 Patricia
San Antonio, TX 78213

IND267 Andrew Hernandez, page 1 of 1

IND267-1 Thank you for your comment.

IND267-2 See response to comment IND17-1.

IND267-3 See response to comment IND17-2.

IND267-4 See response to comment IND17-3.

IND267-5 See response to comment IND17-4.

IND267-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Continuing to ignore the science and the reality of ecological devastation is insane. I agree with everything stated in this letter. We must change our ways and the government must help protect us, the people, as well as the water, the air, the animals -- our world. The profits of the welfare corporations will not buy a healthy environment IND268-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND268-02 IND268-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND268-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND268-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND268-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Beverly Walker
peacockwalk@gmail.com
1602 Teepee Trl
Kingsland, TX 78639

IND268 Beverly Walker, page 1 of 1

IND268-1 Thank you for your comment.

IND268-2 See response to comment IND17-1.

IND268-3 See response to comment IND17-2.

IND268-4 See response to comment IND17-3.

IND268-5 See response to comment IND17-4.

IND268-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Clean air, water and undamaged land does not come from more fracking and export terminals, flammable pipelines, storage tanks and smoking flare stacks. IND269-01
On top of all this the plan is to building terminals on the Texas Gulf Coast line of South Padre Island. Time is running out to cut pollution and this plan will not help. Thank you.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND269-02 IND269-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND269-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND269-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND269-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

James Flanagan
bubbasblues007@hotmail.com
181 Mamalu Dr
Bastrop, TX 78602

IND269 James Flanagan, page 1 of 1

IND269-1 Thank you for your comment. The potential impacts from the Annova LNG Project on air, water, and land are addressed in the EIS.

IND269-2 See response to comment IND17-1.

IND269-3 See response to comment IND17-2.

IND269-4 See response to comment IND17-3.

IND269-5 See response to comment IND17-4.

IND269-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

California is on fire, with the aid of climate change. Oklahoma has more earthquakes than ever before, due to fracking. All smart money is on renewable energy. There is no acceptable reason for these projects, other than to make polluters rich. This is "privatize the gains; socialize the losses". NO! IND270-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND270-02 IND270-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND270-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND270-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND270-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Thomas Nicolazzo
nicolazzo59@gmail.com
1015 W William cannon Dr, #502
Austin, TX 78745

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4:09
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IND270 Thomas Nicolazzo, page 1 of 1

IND270-1 Thank you for your comment. As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND270-2 See response to comment IND17-1.

IND270-3 See response to comment IND17-2.

IND270-4 See response to comment IND17-3.

IND270-5 See response to comment IND17-4.

IND270-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Brownsville Texas is not equipped to cater to such a big catastrophic event
LNG NEEDS TO PAY TAXES IND271-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND271-02 IND271-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND271-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND271-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND271-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cindy Arellano
cindymacosta@icloud.com
25 Tula Ct
Brownsville, TX 78526

IND271 Cindy Arellano, page 1 of 1

IND271-1 Thank you for your comment.

IND271-2 See response to comment IND17-1.

IND271-3 See response to comment IND17-2.

IND271-4 See response to comment IND17-3.

IND271-5 See response to comment IND17-4.

IND271-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Born and raised in the RGV, I for one, would be disappointed if these projects are allowed to proceed. The Laguna Madre is a world class fishery and IT doesn't need any additional pollution! IND272-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND272-02 IND272-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND272-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND272-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND272-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Omar Elizondo
marlinchaser@comcast.net
PO Box 820487
Houston, TX 77282

IND272 Omar Elizondo, page 1 of 1

IND272-1 The potential impacts on commercial and recreational fishing, and the Laguna Madre, are addressed in the EIS.

IND272-2 See response to comment IND17-1.

IND272-3 See response to comment IND17-2.

IND272-4 See response to comment IND17-3.

IND272-5 See response to comment IND17-4.

IND272-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As the windiest state in the nation and one of the sunniest, let's get OFF toxic fossil fuels for the sake of all humanity and earth itself. IND273-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND273-02 IND273-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND273-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the *pipeline route with leaks, spills, and pipeline explosions.* IND273-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND273-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Camilla Figueroa
camillafigueroa@yahoo.com
5006 Pecan Springs Rd # 10
Austin, TX 78723

IND273 Camilla Figueroa, page 1 of 1

IND273-1 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND273-2 See response to comment IND17-1.

IND273-3 See response to comment IND17-2.

IND273-4 See response to comment IND17-3.

IND273-5 See response to comment IND17-4.

IND273-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Big Money Should NOT be allowed to destry our home! Our Beaches! Our Planet! IND274-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND274-02 IND274-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND274-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would *increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change.* The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND274-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND274-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Regina Stanley
reginamaestanley@gmail.com
1914 Bosque Dr
Garland, TX 75040

IND274 Regina Stanley, page 1 of 1

IND274-1 Thank you for your comment.

IND274-2 See response to comment IND17-1.

IND274-3 See response to comment IND17-2.

IND274-4 See response to comment IND17-3.

IND274-5 See response to comment IND17-4.

IND274-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As Texas residents and visitors to South Padre Island, we oppose these fracking projects as destructive and harmful to the environment and the health of residents and tourists. IND275-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND275-02 IND275-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND275-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND275-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND275-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Hahus
tonyc412@msn.com
13055 Cache Crk
San Antonio, TX 78253

IND275 Linda Hahus, page 1 of 1

IND275-1 The proposed Annova LNG Project does not include fracking.

IND275-2 See response to comment IND17-1.

IND275-3 See response to comment IND17-2.

IND275-4 See response to comment IND17-3.

IND275-5 See response to comment IND17-4.

IND275-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As someone who is personally from South East Texas I'm simply horrified and outraged at this travesty. Please find some humanity in yourselves and stop this. IND276-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND276-02 IND276-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND276-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND276-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND276-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Naomi Dove
nmc198530@gmail.com
1354 FM 2245
Kirbyville, TX 75956

IND276 Naomi Dove, page 1 of 1

IND276-1 Thank you for your comment.

IND276-2 See response to comment IND17-1.

IND276-3 See response to comment IND17-2.

IND276-4 See response to comment IND17-3.

IND276-5 See response to comment IND17-4.

IND276-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As fracking, oil drilling, oil transit, pipelines over aquifers, pipelines laid in fishing waters, and more continue, every oil industry person, every legislator and their families will be subject to the toxic environment resulting from drilling and piping oil. These projects must be halted now! IND277-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND277-02 IND277-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND277-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND277-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND277-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Yvonne Hansen
yvonnehanseninaustin@gmail.com
6206 Hillston Dr
Austin, TX 78745

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IND277 Yvonne Hansen, page 1 of 1

IND277-1 The proposed Annova LNG Project does not include fracking, oil drilling, or a pipeline.

IND277-2 See response to comment IND17-1.

IND277-3 See response to comment IND17-2.

IND277-4 See response to comment IND17-3.

IND277-5 See response to comment IND17-4.

IND277-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texas resident I don not want to see these projects bulldoze sacred Indigenous culture sites in South Texas and ruin the pristine coastline of South Padre Island. Nor do I want these export terminals that will require more pipelines and more toxic fracking. This threatens the communities and land across the Eagle Ford shale and Permian Basin regions of Texas. Stop this now. We are killing our coastline and state! IND278-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND278-02 IND278-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, *which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG* resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND278-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND278-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND278-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Dawn Langerock
dlangerock@rocksmixers.com
19915 Lakehurst Loop
Spicewood, TX 78669

IND278 Dawn Langerock, page 1 of 1

IND278-1 Based on surveys and information known to date, including consultation with the Texas Historical Commission, the Annova LNG Project would not impact any known indigenous cultural sites. See further detail in section 4.10 of the EIS. The proposed Annova LNG Project does not include fracking or pipelines. With respect to fracking and pipelines in the Eagle Ford and Permian Basin regions, see response to comment IND9-14.

IND278-2 See response to comment IND17-1.

IND278-3 See response to comment IND17-2.

IND278-4 See response to comment IND17-3.

IND278-5 See response to comment IND17-4.

IND278-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't Mess with Texas' Beaches!!! IND279-01

Sincerely,

Jeff Tave
jefftave@earthlink.net
302 Pineview Cir
El Lago, TX 77586

IND279 Jeff Tave, page 1 of 1

IND279-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Instead of fracking and dependency on certain energy resources we need to come up with other solutions to our energy needs. I find it amazing that this planet has not evolved from some of the practices we still uphold or live by that include a dependency on certain resources given the educations we might have about long term consequences of the choices we make in stewardship of Earth as a whole in a rapidly growing human populace. This planet is only abundant to a certain level based on how we treat it and then we share mutual poverty and toxic consciousness. IND280-01

Sincerely,

Renee Reeves
reneereeves@hotmail.com
1705 Blue Bell Dr
Cedar Park, TX 78613

IND280 Renee Reeves, page 1 of 1

IND280-1 The proposed Annova LNG Project does not include fracking.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am writing to give my opinion on the LNG terminal in South Padre.

What are we going to do - ruin our habitat just to produce more hydrocarbons. IND281-01

South Texas and Padre Island should be preserved as one of the treasures of Texas and the USA. What is the point of producing more gas and oil and making

millions of dollars and the places where we all like to recreate are destroyed.

In addition the earth is warming rapidly - what will the producers do with all the money they are making when our climate,oceans and land masses are ruined by a climate that has warmed to the point that plants and animals including humans are subject to conditions that do not sustain life.

FERC should not permit the project.

Sincerely,

John Nelson
johnelson2007@yahoo.com
4107 Whitfield Ct
Fulshear, TX 77441

IND281 John Nelson, page 1 of 1

IND281-1 Thank you for your comment. See the EIS for an assessment of the potential impacts of the Annova LNG Project on the environment and the region.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I used to visit Padre Island as a kid; it's still one of the most beautiful beaches I've ever seen, and the idea that you're willing to sacrifice that for profit is disgusting. IND282-01

Sincerely,

Lily Beaumont
lilybmnt@gmail.com
531 Sand Bend Dr Apt B
Kerrville, TX 78028

IND282 Lily Beaumont, page 1 of 1

IND282-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

NO fracking ! We need more renewable energy, that is the way of the future ! IND283-01

Sincerely,

Steve Bradley
tbolt47ent.sdb@grandecom.net
2918 Water Lily Dr
Corpus Christi, TX 78415

IND283 Steve Bradley, page 1 of 1

IND283-1 The Annova LNG Project does not include fracking. As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Not in SPI, please! IND284-01

Sincerely,

Steven Reilly
reikomax@aol.com
507 Adams St
San Antonio, TX 78210

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2016 FEB -4 P 3:39
FEDERAL ENERGY
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IND284 Steven Reilly, page 1 of 1

IND284-1 Thank you for your comment. The proposed Annova LNG Project is not proposed in South Padre Island.

IND285 Jean Finch, page 1 of 1

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

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Subject: Comment on the proposed Port of Brownsville [illegible] LNG (CP16-480-000).

What can I say that hasn't already been said.

1. If you believe in God remember that we are the caretakers of his planet and by implementing these plans we are destroying his creation.

2. If God doesn't enter into it remember the BP oil spill and the devastation that followed. We can't allow another mishap to occur. The Southern coastline of Texas is a sanctuary for many different birds species, not to mention the fish and reptiles. IND285-01

3. The economic repercussions to the fishing and tourist industries.

4. Health hazards.

5. Eminent Domain?

I request that the planned fracking not happen. Consider what all the consequences of this are. Let's not sell our planet.

Thank you,

Jean Finch

Houston, Tx

Sincerely,

Jean Finch
finchj1713@att.net
5217 Arboles Dr Apt H
Houston, TX 77035

IND285-1 The proposed Annova LNG project does not include planned fracking.

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

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Subject: Comment on the proposed Port of Brownsville [illegible] Annova LNG (CP16-480-000).

do this IND286-01

Sincerely,

Jennifer Prevost
jennifermprevost@gmail.com
1100 Patricia Apt 504
San Antonio, TX 78213

IND286 Jennifer Prevost, page 1 of 1

IND286-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

STOP KILLING OUR PLANET!!!

Sincerely,

Spike Werda
spudog01@msn.com
918 Galloway dr
El Paso, TX 79912

IND287-01

IND287 Spike Werda, page 1 of 1

IND287-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Clean air and environment in America! IND290-01

Sincerely,

Abbas Aboohamidi
abbas.aboohamidi@ttu.edu
5555 56th Street apt. 1223
Lubbock, TX 79414

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IND290 Abbas Aboohamidi, page 1 of 1

IND290-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Enough! I'm one voter fed up with corporate contempt for this earth and its peoples. Please stop it - here. IND291-01

Sincerely,

Phyllis Price
riosand@earthlink.net
PO Box 1562
San Elizario, TX 79849

IND291 Phyllis Price, page 1 of 1

IND291-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am a native Texan and I've lived here all my life. The wildlife and plants around the places I've lived have shaped me into who I am today, and are directing my future even now - I want to be a research zoologist. But if these LNG and fracking projects are approved, countless species will be put at unnecessary risk and may even go extinct (for example, the North American populations of the endangered ocelot). IND292-01

We need to focus on finding alternative and more sustainable energy sources rather than sucking every last drop of oil out of the ground at any cost. It's not worth the quick money you'll get to destroy everything in your path. Please rethink this initiative and consider more than your personal or company monetary gain before you continue with this incredibly destructive project. IND292-02

Sincerely,

Audrey H
audreymaehorn@gmail.com
365 Parkview Ln
Keller, TX 76248

IND292 Audrey H, page 1 of 1

IND292-1 The potential impacts on wildlife, including the ocelot, are addressed in sections 4.6 and 4.7 of the EIS.

IND292-2 As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

STOP polluting our state! It is making our land, water and air more poisonous and is killing both humans and animals. IND293-01

Sincerely,

Mary Leon
leon3@twc.com
5 Loop St
San Antonio, TX 78212

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2017 FEB -6 P 3:10
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IND293 Mary Leon, page 1 of 1

IND293-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We already have enough fossil fuels to meet the supply, please stop more and protect our natural treasures. IND294-01

Sincerely,

Venkata Kothapalli
v_ratnam@hotmail.com
2442 Arbor Dr
Round Rock, TX 78681

IND294 Venkata Kothapalli, page 1 of 1

IND294-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

fracking is a very controversial process, with bad side effects in states that have tried it! IND295-01

Sincerely,

Marilyn Spivey
maspiveyy@yahoo.com
14232 Peyton Edwards Ave
El Paso, TX 79938

IND295 Marilyn Spivey, page 1 of 1

IND295-1 The proposed Annova LNG Project does not include fracking.

IND296 Stacie Wells, page 1 of 1

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking kills animals and ruins our beautiful country | IND296-01

Sincerely,

Stacie Wells
dizzy_dame26@yahoo.com
2201 Willow Creek Dr
Austin, TX 78741

IND296-1 The proposed Annova LNG Project does not include fracking.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

These projects would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. We shouldn't sacrifice Texas for cheap fossil fuels. Preserve our wonderful State of Texas. IND297-01 IND297-02

Sincerely,

Sandy Schmidt
leo_lion_0811@yahoo.com
136 Philly Ct
Fischer, TX 78623

IND297 Sandy Schmidt, page 1 of 1

IND297-1 With respect to impact on communities, the local environment, and local industries, these potential impacts on addressed in the EIS. Based on surveys and information known to date, including consultation with the Texas Historical Commission, the Annova LNG Project would not impact any known indigenous cultural sites. See further detail in section 4.10 of the EIS.

IND297-2 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This project is undesirable and unnecessary. Cancel it IND300-01

Sincerely,

Ann Sever
asever770@gmail.com
13362 Trail Hollow Dr
Houston, TX 77079

IND300 Ann Sever, page 1 of 1

IND300-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Impeach Trump, defeat GOP, not a party, organized crime IND302-01

Sincerely,

Mike Harris
harrism2334@gmail.com
PO Box 29241
Austin, TX 78755

IND302 Mike Harris, page 1 of 1

IND302-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

think of the grandchildren IND304-01

Sincerely,

Robert Arber
arbermarfa@yahoo.com
PO Box 1453
Marfa, TX 79843

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IND304 Robert Arber, page 1 of 1

IND304-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Veteran and public health physician, I am opposed to all four of these proposed projects because they would harm communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND305-01 IND305-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND305-03

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND305-04

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND305-05

Sincerely,

Vincent Fonseca
vpfonseca@yahoo.com
402 Donaldson Ave
San Antonio, TX 78201

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IND305 Thomas R Smith, page 1 of 1

IND305-1 Cultural resource impacts and mitigation are addressed in section 4.10.4 of the EIS.

IND305-2 Effects to economy and employment are addressed in section 4.9.2 of the EIS.

IND305-3 Permits, approvals, and regulatory reviews are addressed in section 1.5 of the EIS.

IND305-4 Reliability and safety issues and associated requirements to ensure public safety are addressed in section 4.12 of the EIS.

IND305-5 Production, extraction, and end-use of natural gas, including from fracking, are not part of the scope of the EIS. NEPA review of the Project is limited to the socioeconomic and environmental impacts of the proposal before the Commission; therefore, the effects of production and end-use are outside of the scope of this EIS. Section 1.3 of the FEIS has been updated to clarify.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Leave our coast alone. No fracking. Wetlands are vital to protection for our coastline. Fracked gas is not good for the Earth or for its people or creatures. And, I live in TX. IND306-01

Sincerely,

Linda Bedre Vaughn
anewway@earthlink.net
1132 Herkimer St
Houston, TX 77008

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IND306 Linda Bedre Vaughn, page 1 of 1

IND306-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop fracking expansion. This unnecessary fracked gas project would forever scar the wildlife landscape enjoyed by families across Texas, all for corporate profit. IND307-01

Thank you

Sincerely,

Diego Gavilanes
dgavilanes@gmail.com
2400 4th Ave
Canyon, TX 79015

IND307 Diego Gavilanes, page 1 of 1

IND307-1 Wildlife impacts and mitigation measures are addressed in section 4.6 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

https://en.wikipedia.org/wiki/Cleveland_East_Ohio_Gas_explosion

https://en.wikipedia.org/wiki/Texas_City_disaster

https://en.wikipedia.org/wiki/Category:Industrial_fires_and_explosions_in_the_United_States

Do I need to say more? There are better ways of powering an economy other than fossil fuels/ petrochemicals!!!!!!!!!!!!!!!!!!!!!!! Beyond that, The Climate/ Planet can't risk fossil fuels/ petrochemical use any longer; they are obsolete to say the very least. At best, we should only be relied on them as transitional products, nothing to build a new world order on. Think clean; think green; think renewable. IND309-01

Sincerely,

Joel Quaintance
holyman_77340@yahoo.com
1310 15th St Apt 11
Huntsville, TX 77340

IND309 Joel Quaintance, page 1 of 1

IND309-1 As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

For every person that allows this and/or benefits from this should be forced to live in South Texas to literally live with the consequences of their actions. Stop treating US soil like its dispensible! You're killing living things and negatively impacting American lives with this destruction. IND310-01

Sincerely,

Yesenia Ceja
yesenia.ceja@yahoo.com
26416 Grey Horse Run
San Antonio, TX 78260

IND310 Yesenia Ceja, page 1 of 1

IND310-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We should not allow the beautiful beaches and landscapes in South Padre Island to be spoiled by intrusive, unsightly, dangerous LNG export infrastructure. Please deny these projects. Let's preserve this beautiful part of Texas. IND312-01

Mark Hellums

Sincerely,

Mark Hellums
mhellums@sacheminc.com
9901 Salvia Cove
Austin, TX 78759

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IND312 Mark Hellums, page 1 of 1

IND312-1 Visual resources and impacts are addressed in section 4.8.5 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am alarmed that federal agencies would consider building not one but three LNG export terminals along the Texas coastline. This is an important ecoregion, both the valuable natural resources like fishing, and for the clean air and water that come into Texas through this area. Those terminals WILL changes those resources and definitely NOT for the better. All for what? Profit for a fossil fuel company. Not for a better U.S. or a better Texas, or clean energy resource development?the kind we SHOULD be investing in at this time. IND313-01

I am strongly opposed to this action and urge decision makers to REJECT THESE EXPORT TERMINALS. A healthy Texas with natural resources to support our people and Wildlife literally depends on your decision!

Sincerely,

Cynthia Maguire
grownative11@gmail.com
2412 Shenandoah Trl
Denton, TX 76210

IND313 Cynthia Maguire, page 1 of 1

IND313-1 Cumulative impacts, including impacts from other LNG facilities, are addressed in section 4.13 of the EIS.

IND315 Jim Jones, page 1 of 1

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We are now essentially energy independent. We do not need additional ports to export our energy to other countries. South Padre island is a treasure for the people of Texas and the USA. IND315-01

Utilize existing ports to continue the projects as necessary but leave our pristine lands alone. They are only pristine once. I oppose all four projects. It is insanity to export our fracked energy to countries that have banned the practices.

Sincerely,

Jim Jones
jimjones@allstate.com
1627 Nob Hill Cir
Duncanville, TX 75137

IND315-1 See responses to comments CO10-005 and IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop Fracking! IND316-01

Sincerely,

Jim Boldin
boldin@pobox.com
2602 Clear Cv
Austin, TX 78704

IND316 Jim Boldin, page 1 of 1

IND316-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No Fracking. Please stop. Please save our environment. Please think of the health impact. IND317-01

Sincerely,

ma strange
maritast@swbell.net
13606 far hills ln
Dallas, TX 75240

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IND317 Ma Strange, page 1 of 1

IND317-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop this madness! Leave South Padre area pristine! I enjoy vacationing there and this could pollute the entire region! IND319-01

Sincerely,

Sondra York
sondra.york@cor.gov
140 N Greenville Ave
Richardson, TX 75081

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IND319 Sondra York, page 1 of 1

IND319-1 The EIS addresses impacts on the environment from the proposed Project.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The environment is important. We have to take care of it and protect it. Earth is the only home we have. Not everyone is going to make it to the moon. IND320-01

Much love,

Monica D. Cortes

Sincerely,

Monica Cortes
monica.delcarmen@outlook.com
13727 Aviva Ln
Houston, TX 77083

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2018 FEB -4 P 3:42
FEDERAL ENERGY
REGULATORY COMMISSION

IND320 Monica Cortes, page 1 of 1

IND320-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We should not be allowing our precious public lands to be taken by and our resources to be sold for obscene profit by private corporations which are quite often by foreign entities. We the People of the USA are meant to be the beneficiaries of our National treasures. Why is government so willing to destroy our country and it?s environment for pennies! The damage from these projects is irreversible. IND321-01

Sincerely,

Don Sawyer
dadsir2u@yahoo.com
709 White Bass
Conroe, TX 77384

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2017 JUN -4 P 3:42
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IND321 Don Sawyer, page 1 of 1

IND321-1 The EIS addresses impacts on the environment from the proposed Project. Impacts on land use is addressed in sections 4.8.1 through 4.8.4 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is too harmful to continue. STOP FRACKING!!!! IND322-01

Sincerely,

Ivy Buchanan
curlylib@hotmail.com
7131 Wood Hollow Dr
Austin, TX 78731

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SECRETARY OF THE
COMMISSION
2015 FEB -4 P 3:43
FEDERAL ENERGY
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IND322 Ivy Buchanan, page 1 of 1

IND322-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This is a clean tourist area and everyone in Texas wants to keep it clean. Please No more fracking in Texas!! IND323-01

Sincerely,

Dr. Pat Smith
ivorypat@yahoo.com
629 Ridgedale Dr
Richardson, TX 75080

IND323 Dr. Pat Smith, page 1 of 1

IND323-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop polluting beautiful lands and threatening human and wild life for money. Toxic gases/fumes pollute the air we all breathe. Move to more sustainable energy like wind and solar. YOU ARE KILLING US ALL. IND324-01

Sincerely,

Patricia Stinson-Sunbury
pattymack11@hotmail.com
638 Gotier Trace Rd
Smithville, TX 78957

IND324 Patricia Stinson-Sunbury, page 1 of 1

IND324-1 Impacts on air quality are addressed in section 4.11.1 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No terminal to pollute South Padre Island! IND325-01

Sincerely,

Steven Smith
bigtexsms@gmail.com
503 Willow Wood Dr
Pflugerville, TX 78660

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SECRETARY OF THE
COMMISSION
2016 FEB -4 P 3:43
FEDERAL ENERGY
REGULATORY COMMISSION

IND325 Steven Smith, page 1 of 1

IND325-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Our country needs to be laser focused on sustainable sources of green energy, NOT expanding the development of energy sources that pollute and destroy our environment and creatures who have a right to live in peace. It shouldn't matter that LNG has lower carbon emissions than petroleum and coal because it still pollutes and its infrastructure destroys the environment too, while we know sun and wind have no such consequences. As a Texas resident, I oppose all proposed LNG projects across Texas, and as a US citizen I oppose all LNG projects across the US. Everyone needs to throw their support behind a Texas town like Georgetown, which I recently learned is powered 100% by solar and wind. Bravo to Georgetown, Texas! Led by a REPUBLICAN Mayor! Imagine that! And BOO to any Texas politicians supporting the expansion of non-renewable energies that destroy the environment. It's that simple. IND326-01

Sincerely,

Lisa Chung
lisajchung@yahoo.com
5708 Woodmont Ct
Plano, TX 75093

IND326 Lisa Chung, page 1 of 1

IND326-1 As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracked gas projects are a disaster for the fragile ecology of South Texas. IND327-01

Sincerely,

Laura Burns
laurab12@sbcglobal.net
2009 Avenue M
Galveston, TX 77550

IND327 Laura Burns, page 1 of 1

IND327-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

When you recognize that Vice President initiated legislation that gave the Frackers a waiver from the Clean Air Act, you quickly recognize that Fracking does serious damage to our Air, Soil, and Water and without that exception Fracking could NOT happened.

The Fracking fluid & the collection of the contaminated waste water has NO purification process legislated. So they pump this highly contaminated waste water into a underground storage where this polluted water leaks into our ground water. IND328-01

Creating a Terminal for LNG for sale of Fracking gas to other countries is NOT sustainable because these countries are developing their own energy resources like Clean Energy from Solar, Wind & Water Currents.

This cycle of Fracking contamination in order produce natural gas is more damaging to our Air, Soil and Water than it's worth!!

Sincerely,

Steve Sears
searssteve@aol.com
23215 Lidstone Point Ct
Katy, TX 77494

IND328 Steve Sears, page 1 of 1

IND329-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please save our environment IND329-01

Sincerely,

Charity Mccluskey
mccluskey_c@yahoo.com
2516 vine st
Brownwood, TX 76801

IND329 Charity Mccluskey, page 1 of 1

IND329-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND330-01

Sincerely,

Caroline Oneal
carolineoneal@hotmail.com
1300 E M Franklin Ave
Austin, TX 78721

IND330 Caroline Oneal, page 1 of 1

IND330-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stay away from South Texas.

You can build a "beautiful and powerful" pipeline through Mar-A-Lago! IND331-01

Sincerely,

Karl Brooks
kemson@mac.com
2121 17th Ave N
Texas City, TX 77590

IND331 Karl Brooks, page 1 of 1

IND331-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The days of using fossil fuels, including fracked gas, are numbered. What will become of the infrastructure when it is no longer used? Who will pay to restore the habitat that is degraded by the infrastructure? One only has to look at the impacts of coal mining to see that the energy companies are often long gone once the money has been made leaving the taxpayer to foot the bill. Therefore, I am opposed to energy projects and policies that sacrifice the environment. IND332-01

Sincerely,

Robert Sendrey
rsendrey@hotmail.com
18870 Oak Canyon
Conroe, TX 77385

IND332 Robert Sendrey, page 1 of 1

IND332-1 Future plans and abandonment are addressed in section 2.9 of the EIS. Socioeconomic impacts are addressed in section 4.9 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This, like numerous other issues (climate change, food labeling, gun safety, immigration reform, prison reform, education reform, short-term lending regulation, healthcare reform, banking regulation, opioid regulation) remains a vexing problem primarily due to corporations' ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole. IND333-01

Sincerely,

James Klein
jeklein64@yahoo.com
3501 Monterrey St
Corpus Christi, TX 78411

IND333 James Klein, page 1 of 1

IND333-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking endangers our water supply which is mandatory for life. The chemical compounds required to be used in fracking is also dangerous for those exposed to them. Stop wasting and polluting our water. People are more important than any amount of fuel obtained from fracking IND334-01

Sincerely,

Elizabeth Young
young5098@sbcglobal.net
9610 Roy Croft Ave
Helotes, TX 78023

IND334 Elizabeth Young, page 1 of 1

IND334-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

South padre island is a favorite vacation place for my family. I have Strong concerns about the water in these areas, the wildlife habitats and the beautiful birding center and I do not think these fracking export terminals should be in this beautiful place. I am also concerned about the pipelines they will attract and the possibilities of leaks etCetera. IND335-01

Sincerely,

Elizabeth Parker
txkingfshr@aol.com
3452 Mount Vernon Way
Plano, TX 75025

IND335 Elizabeth Parker, page 1 of 1

IND335-1 Fracking is addressed in the response to comment IND09-14. Impacts on water quality and wildlife habitat are addressed in sections 4.3 and 4.6 of the EIS, respectively.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't ruin Texas beaches to export natural gas that we will need in the future. Fracked gas wells have a very limited life so it is important that we not export this limited resource. IND336-01

Sincerely,

Linda Hanratty
llswenard47@gmail.com
4236 Oak Park Ct
Fort Worth, TX 76109

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2010 FEB -4 P 3:44
FEDERAL ENERGY
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IND336 Linda Hanratty, page 1 of 1

IND336-1 See response to comment CO10-005.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop doing permanent damage to Texas! IND337-01

Sincerely,

Dodie Sweeney
dodiesweeney@gmail.com
PO Box 203
Alpine, TX 79831

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:44
FEDERAL ENERGY
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IND337 Dodie Sweeney, page 1 of 1

IND337-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop polluting and poisoning our children's brains and bodies. Do the right thing for once!!! IND338-01

Sincerely,

Evelyn Sardina
evelynsardina@yahoo.com
715 Northaire Dr # 715
Houston, TX 77073

IND338 Evelyn Sardina, page 1 of 1

IND338-1 Thank you for your comment.

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

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2016 FEB -4 P 3 40
FEDERAL ENERGY
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Subject: Comment on the proposed Port of Brownsville LNG export terminal Annovar LNG (CP16-480-000).

I am against all of the 4 proposed projects. I don't want the land, animals, local environment, cultural sites, fishing & shrimping industries to be damaged because of these projects. IND339-01

I don't care how much money is in this business. Where we live & how we take care of our land that gives us life is more important.

we need to use clean energy! in fact we should not even have to pay for energy-

solar panels should be on every house in america & every where.

and cars should and could run on water - its a real thing!

I dont want more pipelines, I dont want anything bulldozed. Leave our parks and national seashores alone. Leave our cultural sites alone! I don't want to be sitting on the beach at Padre Island and have flare stacks ruining my view!

I want you people to think about what your doing! when your on your death bed - will you be thinking "I sure wish I had tore up more ground and made more money, ruined sacred cultural sites, etc." Or will you think- " I sure wish I had seen how beautiful this world is? Paid more attention to the color of the water at Padre.?

The way I see it, however this earth was formed - by God or by some other amazing force of energy. It gives us life, we have everything we need without tearing it up or ruining it. Shouldn't we treat it with the upmost respect! every inch of it.

Roma

Sincerely,

Roma Norwine
romaebeth@yahoo.com
309 S Carroll St
La Porte, TX 77571

IND339 Roma Norwine, page 1 of 1

IND339-1 The EIS addresses impacts on environmental resources. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The whole process of fracking is not good for our health and the environment. IND340-01

Sincerely,

Vernon Berger
vberger@austin.rr.com
5104 Crestway Dr
Austin, TX 78731

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2016 FEB -4 P 3:44
FEDERAL ENERGY
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IND340 Vernon Berger, page 1 of 1

IND340-1 See response to comment IND09-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all 4 natural gas fracking transfer stations. I feel there is unacceptable risk to the coastline and natural habitat IND341-01

Sincerely,

Mary Kennedy
lapdogz@gmail.com
525 Windward Dr
Murphy, TX 75094

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2019 FEB -4 P 3:44
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IND341 Mary Kennedy, page 1 of 1

IND341-1 Impacts on aquatic resources and marine life are addressed in section 4.6.2 of the EIS. Coastal zone management is addressed in section 4.8.6 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of the proposed projects. They would damage the local environment of south Texas. IND342-01

South Padre Island, Port Isabel, Long Island Village, and Laguna Vista have all passed anti LNG resolutions as they do not want their pristine coastlines to be destroyed.

Fracking is a dirty industry which has no place in these fragile areas and communities.

Sincerely,

Irene Martinez
sheena.rules.the.jungle@gmail.com
17604 Klamath Falls Dr
Round Rock, TX 78681

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IND342 Irene Martinez, page 1 of 1

IND342-1 Fracking is addressed in the response to comment IND09-14. Permits, approvals, and regulatory reviews are addressed in section 1.5 of the EIS.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please don't make Texas a sacrifice zone for fossil fuel exports to countries that have banned fracking from their own properties. IND343-01

Sincerely,

Jaen Lawrence
jaenl@andell.com
6144 Preston Creek Dr
Dallas, TX 75240

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2018 FEB -4 P 3:44
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IND343 Jaen Lawrence, page 1 of 1

IND343-1 See response to comment CO10-005.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop, it's not right so just don't do it. IND344-01

Sincerely,

Julisia Jackson
julishia.jackson@yahoo.com
3817 Suffolk Ln
Plano, TX 75023

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SECRETARY OF THE
COMMISSION
2018 FEB -4 P 3:44
FEDERAL ENERGY
REGULATORY COMMISSION

IND344 Julisia Jackson, page 1 of 1

IND344-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We need to think about the impact on future generations. The long term effects will be hard to undo. IND345-01

Sincerely,

Coleen Vicenti
coleenvicenti@gmail.com
1025 Dulles Ave Apt 1125
Stafford, TX 77477

IND345 Coleen Vincenti, page 1 of 1

IND345-1 Future plans and abandonment area addressed in section 2.9 of the EIS. The EIS addresses impacts on environmental resources in section 4; and addresses cumulative impacts in section 4.13.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No LNG export terminal in South Texas!!! IND346-01

Sincerely,

Michael Spradlin
mcs5@earthlink.net
4610 Shavano Birch
San Antonio, TX 78230

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SECRETARY OF THE
COMMISSION
2016 FEB -4 P 3:44
FEDERAL ENERGY
REGULATORY COMMISSION

IND346 Michael Spradlin, page 1 of 1

IND346-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Corporations are destroying the planet and fouling the environment for fuels that we don't need and are a source of our destruction. IND347-01

Sincerely,

Jane Chischilly
claygoddess541@gmail.com
103 Highland Dr
Daingerfield, TX 75638

2015 FEB -4 P 3:44
FEDERAL ENERGY
REGULATORY COMMISSION
SECRETARY'S OFFICE
WASHINGTON, D.C.

IND347 Jane Chischilly, page 1 of 1

IND347-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Trump is the cause for all this get him impeached for raising the amount of gas they can release into our breathing air. I am totally against fracking. If they never fracked again it would be too soon for me. The earth is going to burn up from all the fumes from fracking. IND348-01

Sincerely,

Lorelei Lambert
lluu257bert@outlook.com
4602 Lord Rd
San Antonio, TX 78220

IND348 Lorelei Lambert, page 1 of 1

IND348-1 Fracking is not proposed as part of the Project. See also response to comment IND09-14.

IND349 Elaine Byrne, page 1 of 1

IND349-1 See responses to IND305-1 through IND305-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I live in Texas - a state whose economy is built on the oil and gas industry. I realize the importance to our economy. However, I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND349-01 IND349-02

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND349-03

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND349-04

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND349-05

For these reasons and many others, I am opposed to all four of these projects.

Please consider the concerns we Texans have while you research your DEIS.

Thank you.

Sincerely,

Elaine Byrne
elaine_byrne@yahoo.com
17021 Ennis Trl
Austin, TX 78717

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

There are so few unspoiled places near the coasts and this would be devastating to the area. Please, please, leave nature alone and don't despoil an area used by humans and wildlife. Texas should not be sacrificed for exports to countries like Ireland who have banned fracking in their own country because of the devastation it would cause. IND351-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND351-02 IND351-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND351-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND351-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND351-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Lynn Rich
lynnrichrich@gmail.com
11800 Manchaca Rd Trlr 21
Austin, TX 78748

IND351 Lynn Rich, page 1 of 1

IND351-1 The EIS addresses impacts on wildlife and human interests including socioeconomics, recreation; as well as water and air quality.

IND351-2 See response to comment IND17-1.

IND351-3 See response to comment IND17-2.

IND351-4 See response to comment IND17-3.

IND351-5 See response to comment IND17-4.

IND351-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Against all projects and pipelines due to certainty of costly environmental damage to all concerned. IND352-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND352-02 IND353-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND353-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND353-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND353-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Martin Pesaresi
martinpesaresi@yahoo.com
1835 Lockhill Selma Rd Apt 212
San Antonio, TX 78213

IND352 Martin Pesaresi, page 1 of 1

IND352-1 The EIS addresses impacts on environmental resources.

IND352-2 See response to comment IND17-1.

IND352-3 See response to comment IND17-2.

IND352-4 See response to comment IND17-3.

IND352-5 See response to comment IND17-4.

IND352-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

stop fracking so the air will be cleaner and the environment will be much better for all people and animals IND354-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND354-02 IND354-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND354-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND354-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND354-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cathy Chesser
clschesser@sbcglobal.net
10284 Longmont Dr
Houston, TX 77042

IND354 Cathy Chesser, page 1 of 1

IND354-1 Fracking is addressed in the response to comment IND09-14.

IND354-2 See response to comment IND17-1.

IND354-3 See response to comment IND17-2.

IND354-4 See response to comment IND17-3.

IND354-5 See response to comment IND17-4.

IND354-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This fracked gas process is bad for any state! Gas pipelines and transport is dangerous and pollutes the air and water. I DO NOT WANT THIS ....WE SHOULD BE MOVING AWAY FROM DIRTY ENERGY...COAL, OIL,AND GAS ALSO. The export proposed terminal in South Texas will be a disaster! DON'T DO IT!!! PEOPLE OVER PROFITS ALWAYS!! IND355-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND355-02 IND355-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND355-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND355-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND355-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jan E. Vaughan
janspirit@gvec.net
191 Little Oak Rd
Seguin, TX 78155

IND355 Jan Vaughan, page 1 of 1

IND355-1 Fracking is addressed in the response to comment IND09-14.

IND355-2 See response to comment IND17-1.

IND355-3 See response to comment IND17-2.

IND355-4 See response to comment IND17-3.

IND355-5 See response to comment IND17-4.

IND355-6 See response to comment IND17-5.

v

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This is a bad idea. Especially after the Climate Change Report last week. A solar array the length of the pipeline could produce approx the same power with no emissions and no energy costs for 2 decades. Also, no worries about leaks, no risk of explosion, no pollution, and no protesters. IND356-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND356-02 IND356-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND356-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND356-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND356-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

David Ruda
daveruda@hotmail.com
1239 Coronado Ln
Duncanville, TX 75137

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SECRETARY OF THE
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2019 FEB -4 P 3:45
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IND356 David Ruda, page 1 of 1

IND356-1 See response to comment IND76-001.

IND356-2 See response to comment IND17-1.

IND356-3 See response to comment IND17-2.

IND356-4 See response to comment IND17-3.

IND356-5 See response to comment IND17-4.

IND356-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I'm opposing of these Fracking & Pipeline Corporations in South Texas and along the Rio Grande Valley. I'm a Native American member associated with the (Carrizo Comecrudo Tribe of Texas) in Floresville, Texas. We do not want our ancestors that are buried on sacred land disturbed nor do we want our protected endangered wildlife animals & butterflies migration in these locations disrupted from these fracking & pipeline corporations. IND357-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND357-02 IND357-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND357-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND357-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND357-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

HECTOR MEDELLIN
hectorspalace@gmail.com
401 Private Road 4732
Rhome, TX 76078

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:45
FEDERAL ENERGY
REGULATORY COMMISSION

IND357 Hector Medellin, page 1 of 1

IND357-1 Fracking is addressed in the response to comment IND09-14.

IND357-2 See response to comment IND17-1.

IND357-3 See response to comment IND17-2.

IND357-4 See response to comment IND17-3.

IND357-5 See response to comment IND17-4.

IND357-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop this monstrosity. IND358-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND358-02 IND358-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND358-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND358-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND358-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kelly Hobbs
kinsight@icloud.com
2900 Vz County Road 4210
Athens, TX 75752

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:45
FEDERAL ENERGY
REGULATORY COMMISSION

IND358 Kelly Hobbs, page 1 of 1

IND358-1 Thank you for your comment.

IND358-2 See response to comment IND17-1.

IND358-3 See response to comment IND17-2.

IND358-4 See response to comment IND17-3.

IND358-5 See response to comment IND17-4.

IND358-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Just NO! Please! IND359-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND359-02 IND359-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND359-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND359-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND359-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sandy Ransom
sandyransom7@yahoo.com
3116 Sacbe Cv
Austin, TX 78745

IND359 Sandy Ransom, page 1 of 1

IND359-1 Thank you for your comment.

IND359-2 See response to comment IND17-1.

IND359-3 See response to comment IND17-2.

IND359-4 See response to comment IND17-3.

IND359-5 See response to comment IND17-4.

IND359-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't need them. Don't want them. The rocket base is enough. They can use the existing mess at Corpus Christi or Houston. IND361-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND361-02 IND361-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND361-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND361-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND361-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ed Breidenbach
ebreiden@live.com
820 Killarney Rd
Floresville, TX 78114

IND361 Ed Breidenbach, page 1 of 1

IND361-1 Thank you for your comment.

IND361-2 See response to comment IND17-1.

IND361-3 See response to comment IND17-2.

IND361-4 See response to comment IND17-3.

IND361-5 See response to comment IND17-4.

IND361-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please think of other family's and kids if you can't think your own when doing things like this. IND364-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND364-02 IND364-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND364-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND364-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND354-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

James Smith
shtims@live.com
5931 Greenville Ave # 657
Dallas, TX 75206

IND364 James Smith, page 1 of 1

IND364-1 Thank you for your comment.

IND364-2 See response to comment IND17-1.

IND364-3 See response to comment IND17-2.

IND364-4 See response to comment IND17-3.

IND364-5 See response to comment IND17-4.

IND364-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No fracking!!!! Not here, not anywhere!!!
Not now, not ever!!!!
Can't you all make money without destroying our Planet?!?! IND365-01
The Schons and the Dicostes
Houston, Texas

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND365-02
would endanger communities across Texas, damage the local environment of South Texas, destroy
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND365-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista,
which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG
resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would IND365-04
increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change.
The terminals would also demand a massive pipeline network, and threaten families living along the
pipeline route with leaks, spills, and pipeline explosions. IND365-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries.
Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND365-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Patricia Schon
langpro@swbell.net
4906 Holly St
Bellaire, TX 77401

IND365 Patricia Schon, page 1 of 1

IND365-1 Fracking is addressed in the response to comment IND09-14.

IND365-2 See response to comment IND17-1.

IND365-3 See response to comment IND17-2.

IND365-4 See response to comment IND17-3.

IND365-5 See response to comment IND17-4.

IND365-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Dear Senator, Representative, or energy official,

Please stop greenlighting fracking projects. As the administration's recently released climate assessment indicates, out situation is increasingly tenuous, and we need to do whatever we can to try to slow down the imminent environmental crisis. IND366-01

Thank you!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND366-02 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND366-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND366-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND366-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND366-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Karen Sterling
good2go2k@aol.com
127 McLeod
Cedar Creek, TX 78612

IND366 Karen Sterling, page 1 of 1

IND366-1 Fracking is addressed in the response to comment IND09-14.

IND366-2 See response to comment IND17-1.

IND366-3 See response to comment IND17-2.

IND366-4 See response to comment IND17-3.

IND366-5 See response to comment IND17-4.

IND366-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I have been visiting South Padre Island my entire life and tourism is too important for this the state of Texas to ruin our environment. We need to re-think possibilities of where we can drill that won't affect the local citizens of the area and jeopardize the future of the community that Texans regularly visit every year to enjoy fishing, surfing, scuba diving and many other activities. IND367-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND367-02 IND367-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND367-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND367-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND367-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

TURNEY MAURER
turney.maurer@gmail.com
124 HIGHLANDER ST
LAKEWAY, TX 78734

IND367 Turney Maurer, page 1 of 1

IND367-1 Impacts on communities and recreation are addressed in sections 4.8.3 and 4.8.4 of the EIS, respectively.

IND367-2 See response to comment IND17-1.

IND367-3 See response to comment IND17-2.

IND367-4 See response to comment IND17-3.

IND367-5 See response to comment IND17-4.

IND367-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Natural gas is for our national security, to protect us from dependence on oil from the Middle East . That was the meme that promoted fracking in the first place. So stop trying to weaken the U.S. by selling off our national security to the highest bidder! IND370-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND370-02 IND370-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND370-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND370-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND370-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ken Odell
kenis1man@gmail.com
6217 Loydhill Ln
Fort Worth, TX 76135

IND370 Ken Odell, page 1 of 1

IND370-1 Fracking is addressed in the response to comment IND09-14. LNG export is addressed in the response to comment CO10-005.

IND370-2 See response to comment IND17-1.

IND370-3 See response to comment IND17-2.

IND370-4 See response to comment IND17-3.

IND370-5 See response to comment IND17-4.

IND370-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking has too many disastrous consequences. It would effectually destroy the region?s fishing and shrimping industries. It would irreparably damage the local environment. European banks ?- from France and Ireland, which have themselves banned fracking ?- are financing this proposed operation in Texas with hypocritical insouciance. The pristine coastline of South Padre Island in Texas could be ruined by flammable pipelines, storage tanks and smoking fire stacks. Other regions in Texas could suffer untold adverse effects. IND371-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND371-02 IND371-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG *resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.* IND371-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND371-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don"t sacrifice my community and the rest of Texas for cheap fossil fuels. IND371-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Christopher Hathaway
montre1@twc.com
19275 Stone Oak Pkwy Apt 913
San Antonio, TX 78258

IND371 Christopher Hathaway, page 1 of 1

IND371-1 Fracking is addressed in the response to comment IND09-14. Environmental impacts, including impacts on coastal resources, are addressed in the EIS.

IND371-2 See response to comment IND17-1.

IND371-3 See response to comment IND17-2.

IND371-4 See response to comment IND17-3.

IND371-5 See response to comment IND17-4.

IND371-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I'm sorry but I work in oilfield and support expansion IND372-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND372-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND372-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND372-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND372-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND372-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Terri Mckeegan
tmckeegan85@gmail.com
3906 Bonita Lane
La porte, TX 77571

IND372 Terri Mckeegan, page 1 of 1

IND372-1 Thank you for your comment.

IND372-2 See response to comment IND17-1.

IND372-3 See response to comment IND17-2.

IND372-4 See response to comment IND17-3.

IND372-5 See response to comment IND17-4.

IND372-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

While Gas and Oil companies; with investors among the POWER in Washington, seem to have a strangle hold in Washington, the actual Americans that live in the communities and have the right to CLEAN Water, Non-toxic infrastructures DO NOT WANT these companies coming in and polluting their land, water, and towns causing illness and lowering property values. IND374-01
Alternative fuels are no longer silenced. To allow this type of 'exploration' is to perpetuate a dying; slowly due to greed, but dying industry and brings such decisions by 'Agencies' or 'Authorities' into question.
At one time Americans were protected, now it seems communities and public outcry for decency is just getting in the way of CORPORATE special interests supported by 'pay-back' politicians.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND374-02 would endanger communities across Texas, damage the local environment of South Texas, destroy IND374-03 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND374-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND374-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND374-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Margaret Little
meg.little@sabre.com
1304 W Lovers Ln
Arlington, TX 76013

IND374 Margaret Little, page 1 of 1

IND374-1 Impacts on water resources and water quality are addressed in section 4.3 of the EIS. Impacts on socioeconomic resources, including economic resources, are addressed in section 4.9 of the EIS. The Project purpose and agency involvement related to the NEPA process are described in section 1 of the EIS.

IND374-2 See response to comment IND17-1.

IND374-3 See response to comment IND17-2.

IND374-4 See response to comment IND17-3.

IND374-5 See response to comment IND17-4.

IND374-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

How is it smart to use up one natural resource (water- that can never again be usable to humans) to get at another natural resource? This needs to end. IND375-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND375-02 IND375-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND375-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND375-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND375-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Tracy mcmillan
tracy.mcmillan@fwisd.org
1924 Warner Rd
Fort Worth, TX 76110

IND375 Tracy Mcmillan, page 1 of 1

IND375-1 Impacts on water resources are addressed in section 4.3 of the EIS.

IND375-2 See response to comment IND17-1.

IND375-3 See response to comment IND17-2.

IND375-4 See response to comment IND17-3.

IND375-5 See response to comment IND17-4.

IND375-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We need to move forward with renewable energy and stop the cycle of sacrificing people for antiquated technology. IND376-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND376-02 IND376-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND376-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND376-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND376-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sandy Phillips
highenergycutie@gmail.com
606 Arrowhead Trl
Cedar Park, TX 78613

IND376 Sandy Phillips, page 1 of 1

IND376-1 See response to comment IND76-001.

IND376-2 See response to comment IND17-1.

IND376-3 See response to comment IND17-2.

IND376-4 See response to comment IND17-3.

IND376-5 See response to comment IND17-4.

IND376-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We need to retain our natural and national heritage. Stop the fracking IND377-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND377-02 IND377-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND377-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND377-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND377-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rick Boykin
rickboykin@vanirconsulting.com
6416 Brandon Ct
Plano, TX 75093

IND377 Rick Boykin, page 1 of 1

IND377-1 Fracking is addressed in the response to comment IND09-14.

IND377-2 See response to comment IND17-1.

IND377-3 See response to comment IND17-2.

IND377-4 See response to comment IND17-3.

IND377-5 See response to comment IND17-4.

IND377-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please don't destroy our very last pristine coastline. We want our grandchildren to know what we have known. Thank you. IND378-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND378-02 IND378-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND378-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND378-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND378-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kent Rylander
kent.rylander@mac.com
512 W Austin St
Fredericksburg, TX 78624

IND378 Kent Rylander, page 1 of 1

IND378-1 Thank you for your comment.

IND378-2 See response to comment IND17-1.

IND378-3 See response to comment IND17-2.

IND378-4 See response to comment IND17-3.

IND378-5 See response to comment IND17-4.

IND378-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

According to your communication of 10/12/18, the draft Environmental Impact Statement (EIS) concludes that, "the proposed Rio Grande LNG Project would result in some adverse environmental impacts," that combined with other projects in the area, would result in "significant cumulative impacts." Given the incalculable value of one of the last remaining pristine coastal areas of Texas, this conclusion is enough for me to urge you NOT to approve this project. Please listen to the people of the area -- residents and small business owners -- not to mention the people who visit South Padre and enjoy its natural environment, who are also opposed to this project. IND379-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND379-02 IND379-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND379-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND379-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND379-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

John Langston
langst7@utexas.edu
3910 Thistledown Dr
Pasadena, TX 77504

IND379 John Langston, page 1 of 1

IND379-1 See response to comment CO6-19.

IND379-2 See response to comment IND17-1.

IND379-3 See response to comment IND17-2.

IND379-4 See response to comment IND17-3.

IND379-5 See response to comment IND17-4.

IND379-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

All science points out the urgency in turning to renewable energy in order to reduce climate change effects. Coupled with the dangers presented by pipelines and fracking and the destruction of the South Padre Island coastline, proceeding with this proposed LNG export terminal project is at best ill-advised and more likely extremely risky and foolhardy. Please listen to the citizens of the areas more directly effected by this proposed project and reject this project. IND380-01
Thank you for consideration of this missive.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND380-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND380-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND380-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND380-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND380-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Gilberto Lopez
glopez430t@outlook.com
430 Torrington Dr
Austin, TX 78737

IND380 Gilberto Lopez, page 1 of 1

IND380-1 Fracking is addressed in the response to comment IND09-14. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND380-2 See response to comment IND17-1.

IND380-3 See response to comment IND17-2.

IND380-4 See response to comment IND17-3.

IND380-5 See response to comment IND17-4.

IND380-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Our planet must be sustained. Our natural environments must be kept intact! NO fracking!! NO fracking!! Greed is killing our planet. Do you people don't care about our Earth??? NO FRACKING IND381-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND381-02 IND381-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND381-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND381-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND381-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Yvonne Zepeda
yzcats@sbcglobal.net
119 Kirkpatrick Ave
San Antonio, TX 78210

IND381 Yvonne Zepeda, page 1 of 1

IND381-1 Fracking is addressed in the response to comment IND09-14.

IND381-2 See response to comment IND17-1.

IND381-3 See response to comment IND17-2.

IND381-4 See response to comment IND17-3.

IND381-5 See response to comment IND17-4.

IND381-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We dont want that here youbare going to ruin our beaches cause problems with our wildlife. IND382-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND382-02 IND382-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND382-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND382-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND382-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Crystal Frias
cfrias1396@gmail.com
20365 FM508
Harlingen, TX 78550

IND382 Crystal Frias, page 1 of 1

IND382-1 Impacts on wildlife and aquatic resources are addressed in section 4.6. of the EIS.

IND382-2 See response to comment IND17-1.

IND382-3 See response to comment IND17-2.

IND382-4 See response to comment IND17-3.

IND382-5 See response to comment IND17-4.

IND382-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please consider the air quality for South Texans and gulf coast tourism. My family lives in Brownsville and I grew up going to South Padre Island every summer. This past August my fiance even planned a surprise proposal on the island. It's time to make moves towards a more sustainable future and not one that will further escalate climate change and reduce air quality and risk for environmental damage to this region. We need to keep this area clean for our generations to come. For these reasons and many others, I am opposed to all four of these projects. IND383-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND383-02 IND383-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND383-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND383-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND383-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Marissa Williams
williams.ma@ymail.com
11238 Fall Breeze Dr
Houston, TX 77064

IND383 Marissa Williams, page 1 of 1

IND383-1 Impacts on air quality are addressed in section 4.11 of the EIS.

IND383-2 See response to comment IND17-1.

IND383-3 See response to comment IND17-2.

IND383-4 See response to comment IND17-3.

IND383-5 See response to comment IND17-4.

IND383-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

LNG Pipelings and Fackingl needs to stop. Water is a resource. We need to live. You are hurting and killing spies o. People plants and life. IND384-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND384-02 IND384-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND384-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND384-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND384-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Hataway
lindahataway8@gmail.com
525 SCHOOL St Apt 305
TOMBALL, TX 77375

IND384 Linda Hataway, page 1 of 1

IND384-1 Fracking is addressed in the response to comment IND09-14. Environmental impacts, including impacts on water, wildlife, and vegetation are addressed in the EIS.

IND384-2 See response to comment IND17-1.

IND384-3 See response to comment IND17-2.

IND384-4 See response to comment IND17-3.

IND384-5 See response to comment IND17-4.

IND384-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I'm opposed to fracking in South Texas. IND385-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND385-02 IND385-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND385-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the *pipeline route with leaks, spills, and pipeline explosions.* IND385-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND385-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

J Talbot
talbot@talbotworld.com
305 W Milton St
Austin, TX 78704

IND385 J. Talbot, page 1 of 1

IND385-1 Fracking is addressed in the response to comment IND09-14.

IND385-2 See response to comment IND17-1.

IND385-3 See response to comment IND17-2.

IND385-4 See response to comment IND17-3.

IND385-5 See response to comment IND17-4.

IND385-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

#BreakTheFrackCycle: Texas is not a Sacrifice Zone IND386-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND386-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND386-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND386-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND386-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. *Don't sacrifice my community and the rest of Texas for cheap fossil fuels.* IND386-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Janet Phillips
jlp0410@verizon.net
701 Scottish Mist Trl
Highland Village, TX 75077

IND386 Janet Phillips, page 1 of 1

IND386-1 Fracking is addressed in the response to comment IND09-14.

IND386-2 See response to comment IND17-1.

IND386-3 See response to comment IND17-2.

IND386-4 See response to comment IND17-3.

IND386-5 See response to comment IND17-4.

IND386-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a voting Texan, I am opposed to all four of these proposed projects. The risks and damages vastly outweigh the benefits. IND387-01
These projects would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND387-02 IND387-03
The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND387-04
Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND387-05
These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their own countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND387-06
For these reasons and many others, I am opposed to all four of these projects.

Sincerely,

Michelle Emmitt
mjemmitt@yahoo.com
3400 Bowie St
Amarillo, TX 79109

IND387 Michelle Emmitt, page 1 of 1

IND387-1 Overall conclusions and recommendations are addressed in section 5 of the EIS.

IND387-2 See response to comment IND17-1.

IND387-3 See response to comment IND17-2.

IND387-4 See response to comment IND17-3.

IND387-5 See response to comment IND17-4.

IND387-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This needs to be outlawed. It's harmful, unnecessary and just downright wrong for every single community involved. IND388-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND388-02 IND388-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND388-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND388-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND388-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Lisa Barrett
kumirami@aol.com
10 Poehnert Rd
Boerne, TX 78006

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:46
FEDERAL ENERGY
REGULATORY COMMISSION

IND388 Lisa Barrett, page 1 of 1

IND388-1 Thank you for your comment.

IND388-2 See response to comment IND17-1.

IND388-3 See response to comment IND17-2.

IND388-4 See response to comment IND17-3.

IND388-5 See response to comment IND17-4.

IND388-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop tearing down land in order to fill your pockets. There are more than enough pipelines running through the United States as it is, it is not necessary to add more. Especially so close to the ocean where the beaches that children swim at could get polluted and contaminated by poisonous chemicals. Not to mention the damage it could cause to the ecosystem. Oh, in case you didn't know, the ecosystem is a part of where we live, so we should really be taking care of that. You might be thinking, 'but that doesn't affect me, I don't live here' and you are right.... You don't live here. But there are thousands that do, and hundreds that flock to this area during spring break. And if you didn't know already, this community thrives from the profits they make during that one time of the year. You thrive throughout the entire year. So stop being a greedy, money hungry corporation, and start actually caring about the people whose lives you impact. IND389-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND389-02 IND389-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND389-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND389-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND389-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Nika Dunn
zephera3@gmail.com
6020 Danny Kaye
San Antonio, TX 78240

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:46
FEDERAL ENERGY
REGULATORY COMMISSION

IND389 Nika Dunn, page 1 of 1

IND389-1 The purpose of the proposed Project is addressed in section 1.1 of the EIS. Environmental impacts are addressed in the EIS.

IND389-2 See response to comment IND17-1.

IND389-3 See response to comment IND17-2.

IND389-4 See response to comment IND17-3.

IND389-5 See response to comment IND17-4.

IND389-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop LNG. I am opposed to fracking for safety, environmental and ethical reasons, which are too numerous to name, and I do not understand why we would put our citizens at risk to supply cheap, highly risky fuel for countries that do not allow fracking. Each of us has a responsibility to leave this planet in good condition for the enjoyment and sustainability of our children and grandchildren. We are no longer in a position to take these risks with our planet dangerously close to a tipping point. It is abusive to take advantage of communities with limited resources to fight these projects. Thank you for your consideration. IND391-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND391-02 IND391-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND391-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND391-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND391-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kathryn Brown
kathy.kmb@gmail.com
2160 S Rainbow Ranch Rd
WIMBERLEY, TX 78676

IND391 Kathryn Brown, page 1 of 1

IND391-1 Fracking is addressed in the response to comment IND09-14. Socioeconomic impacts including environmental justice issues are addressed in section 4.9 of the EIS.

IND391-2 See response to comment IND17-1.

IND391-3 See response to comment IND17-2.

IND391-4 See response to comment IND17-3.

IND391-5 See response to comment IND17-4.

IND391-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please DO NOT ALLOW new LNG export terminals to be built in South Texas! PROTECT PADRE ISLAND! The beaches of Texas belong to all of us, and represent one of the few beautiful natural places that all citizens can access. Do not allow them to be destroyed by industry. IND392-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND392-02 IND392-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND392-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND392-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND392-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Karin Ascot
karin.ascot@gmail.com
405 Academy Dr
Austin, TX 78704

IND392 Karin Ascot, page 1 of 1

IND392-1 Impacts on visual resources are addressed in section 4.8.5 of the EIS.

IND392-2 See response to comment IND17-1.

IND392-3 See response to comment IND17-2.

IND392-4 See response to comment IND17-3.

IND392-5 See response to comment IND17-4.

IND392-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

To whom it may concern,

Please do not authorize these new export terminals and pipelines. Fracking is dirty energy. IND394-01

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND394-02 IND394-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND394-04

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND394-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND394-06

For these reasons and many others, I am opposed to all four of these projects.

Jane Miller Langley

janelangley@earthlink.net
1186 Madeline St
New Braunfels, TX 78132

IND394 Jane Miller Langley, page 1 of 1

IND394-1 Fracking is addressed in the response to comment IND09-14.

IND394-2 See response to comment IND17-1.

IND394-3 See response to comment IND17-2.

IND394-4 See response to comment IND17-3.

IND394-5 See response to comment IND17-4.

IND394-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Trump is an idiot, he is loosing his mind, he need to be relieved of his duties, he is destroying the USA!!! IND395-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND395-02 IND395-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND395-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND395-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND395-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Michael Phipps
michael.phipps@entrematic.com
909 Doral Cir
McKinney, TX 75069

IND395 Michael Phipps, page 1 of 1

IND395-1 Thank you for your comment.

IND395-2 See response to comment IND17-1.

IND395-3 See response to comment IND17-2.

IND395-4 See response to comment IND17-3.

IND395-5 See response to comment IND17-4.

IND395-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

BreakTheFrackCycle: Texas is not a Sacrifice Zone IND396-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND396-02 IND396-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND396-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND396-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND396-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

DR STERN
goldentreasurz@yahoo.com
5925 Forest
DALLAS, TX 75230

IND396 Dr. Stern, page 1 of 1

IND396-1 Fracking is addressed in the response to comment IND9-14.

IND396-2 See response to comment IND17-1.

IND396-3 See response to comment IND17-2.

IND396-4 See response to comment IND17-3.

IND396-5 See response to comment IND17-4.

IND396-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't bulldoze the pristine coastline of South Padre Island and pollute my community!!! You can put those pipelines somewhere else!! IND397-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND397-02 IND397-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND397-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND397-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND397-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rhonda Boehm
rkcboehm@swbell.net
5030 Poinciana Dr
Houston, TX 77092

IND397 Rhonda Boehm, page 1 of 1

IND397-1 The alternatives evaluation is addressed in section 3.0 of the EIS.

IND397-2 See response to comment IND17-1.

IND397-3 See response to comment IND17-2.

IND397-4 See response to comment IND17-3.

IND397-5 See response to comment IND17-4.

IND397-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am strongly opposed to all of these proposed projects. The South Padre Island coastal area is literally the only nice coastal area of Texas left for recreation. The rest of the coast heading north is a mess of refineries. The residents of the South Padre area have made clear they do not want these projects because their livelihood (tourism) would be damaged, as well as the environment they live in. I?ve been going to South Padre Island every year for the past 15 years. Making it another Corpus Christi would be a tragedy. IND398-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND398-02 IND398-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND398-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND398-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND398-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Joseph Krause
joseph_krause@hotmail.com
7011 Meadow Lake Ave
Dallas, TX 75214

IND398 Joseph Krause, page 1 of 1

IND398-1 Impacts on recreation are addressed in section 4.8.4 of the EIS.

IND398-2 See response to comment IND17-1.

IND398-3 See response to comment IND17-2.

IND398-4 See response to comment IND17-3.

IND398-5 See response to comment IND17-4.

IND398-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We want our beautiful beaches and parks protected and not sacrificed for fossil fuel industry profit! Stop destroying our environment you're even coming after our trees exploiting the California fires for the timber industry. We see you and we will remember in 2020 don't doubt it for a minute. IND399-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND399-02 IND399-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND399-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND399-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND399-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Tanya Kasper
tkasper@newvistasolutions.com
971 Taylor Ranch Rd
Wimberley, TX 78676

IND399 Tanya Kasper, page 1 of 1

IND399-1 Impacts on visual resources are addressed in section 4.8.5 of the EIS.

IND399-2 See response to comment IND17-1.

IND399-3 See response to comment IND17-2.

IND399-4 See response to comment IND17-3.

IND399-5 See response to comment IND17-4.

IND399-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking has been banned by several countries. We need to join them. There are too many pollution issues. IND400-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND400-02 IND400-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND400-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND400-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND400-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Julie Mayfield
jumayfield@aol.com
2014 Kayewood Dr
Denton, TX 76209

IND400 Julie Mayfield, page 1 of 1

IND400-1 Fracking is addressed in the response to comment IND9-14.

IND400-2 See response to comment IND17-1.

IND400-3 See response to comment IND17-2.

IND400-4 See response to comment IND17-3.

IND400-5 See response to comment IND17-4.

IND400-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We want our environment protected! IND401-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND401-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND401-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, IND401-04
which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the IND401-05
pipeline route with leaks, spills, and pipeline explosions.

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. IND401-06
Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

For these reasons and many others, I am opposed to these projects.

Sincerely,

Gary Kasper
gkasper@newvistasolutions.com
971 Taylor Ranch Rd
Wimberley, TX 78676

IND401 Gary Kasper, page 1 of 1

IND401-1 Thank you for your comment.

IND401-2 See response to comment IND17-1.

IND401-3 See response to comment IND17-2.

IND401-4 See response to comment IND17-3.

IND401-5 See response to comment IND17-4.

IND401-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is proven to be detrimental to people and the environment! End fracking forever! IND402-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND402-02 IND402-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND402-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND402-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND402-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sabrina Cook
raven420_6@hotmail.com
3519 E Creek Club Dr
Missouri City, TX 77459

IND402 Sabrina Cook, page 1 of 1

IND402-1 Fracking is addressed in the response to comment IND9-14.

IND402-2 See response to comment IND17-1.

IND402-3 See response to comment IND17-2.

IND402-4 See response to comment IND17-3.

IND402-5 See response to comment IND17-4.

IND402-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

These proposed LNG export terminal projects are for the benefit and profit of a few corporations, backed by foreign investors whose countries will reap the benefits without any of the long-time risks. Despite the efforts of the local communities to protect their homes and livelihoods by passing anti-LNG resolutions, they could be forced to live with the environmental and scenic pollution these gas plants would bring for many years to come. IND404-01

The construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change as well as light and air pollution caused by flaring, along with health risks to residents who breathe the air and drink the water.

The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND404-02

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. ind404-03

Sincerely,

Linda Cooke
lindaccooke@att.net
4029 Lively Ln
Dallas, TX 75220

IND404 Linda Cooke, page 1 of 1

IND404-1 With respect to the potential to increase fracking in the Eagle Ford shale and Permian Basin, see response to comment CO0-14. With respect to the Project's contribution to climate change, see section 4.13.3.9 of the EIS. Other cumulative effects from construction of the three proposed LNG terminals are addressed in section 4.13 of the EIS.

IND404-2 The non-jurisdictional pipeline that would be associated with the Annova LNG Project would be about 9 miles in length. Potential impacts from that pipeline are included in our assessment of cumulative impacts in section 4.13 of the EIS.

IND404-3 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I sometimes have to travel on roads where fracking equipment looks like a forest of trees but instead of spewing oxygen the fracking fields spews chemicals/outgas and pollution that requires me to wear a special mask. Further I know people who live near fracking fields and they notice a change in quality of air and know that water for the public and plants is being used for profits of a few who do not live where the water and land is being descimated. People before profits. Sustainalbe energy before profits. thank you. IND406-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND406-02 IND406-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND406-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND406-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND406-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Bedre
anewway@earthlink.com
1132 Herkimer St
Houston, TX 77008

IND406 Linda Bedre, page 1 of 1

IND406-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND406-2 See response to comment IND17-1.

IND406-3 See response to comment IND17-2.

IND406-4 See response to comment IND17-3.

IND406-5 See response to comment IND17-4.

IND406-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

It's illegal to frack in France but we are letting them frack the hell out of Texas! Total, a French company is active in the Barnett Shale. French banks are financing fracking in South Texas. This is obscene. Scientific peer reviewed studies have shown very clearly the dangers to populations, water, air and the substrata of the earth. This may very well create jobs but the cost is far greater than jobs. We must redirect these jobs to renewable energy, redirect ourselves to the future. Fossil fuel is the dirty past. Stop this insanity! IND407-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND407-02 IND407-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND407-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND407-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND407-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Katheryn Rogers
moma_kata@yahoo.com
523 Meadowbrook Dr
Arlington, TX 76010

IND407 Katheryn Rogers, page 1 of 1

IND407-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND407-2 See response to comment IND17-1.

IND407-3 See response to comment IND17-2.

IND407-4 See response to comment IND17-3.

IND407-5 See response to comment IND17-4.

IND407-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The proposed LNG export terminal and associated pipelines in south Texas are a fool's bargain that directly endangers the south Texas coast and barrier islands , wildlife, and quality of life for South Texans, while adding further to the real dangers posed by greenhouse gasses. As with most such deals, this one would provide short term reward for a select few at the expense of many, while passing costs to future generations . Don't agree to this unfair and unwise proposal. IND408-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND408-02 IND408-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND408-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND408-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND408-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Alan Ogden
scot1111@flash.net
1111 W Oltorf St
Austin, TX 78704

IND408 Alan Ogden, page 1 of 1

IND408-1 The potential impact of the Annova Project on the region, including on wildlife and residents of the area, is evaluated in the EIS.

IND408-2 See response to comment IND17-1.

IND408-3 See response to comment IND17-2.

IND408-4 See response to comment IND17-3.

IND408-5 See response to comment IND17-4.

IND408-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

By building flammable pipelines, storage tanks, and smoking flare stacks in the South Texas communities YOU will be responsible for the destruction of homes, businesses and schools. The air will be filthy with pollutants caused by these projects thereby turning Texas into the state with most polluted air and soil. Did you not ready the recent report prepared by 13 government agencies on climate change? And don?t say it?s a fairly tale. We should be developing and proposing developments and organizations for clean air and water limiting fossil fuels to almost nothing. Do you have families? Children? Grandchildren? They are the ones along with millions of your fellow Texans who will pay the price of your recklessness if you continue. There are other options available. Please, please cease this madness and do what YOU know to be the right thing for Texas and our country - NO FRACKING. DO NOT CONTINUE WITH THE 4 PROPOSED PROJECTS AS THEY WILL ENDANGER TEXAS, ITS CITIZENS AND THE ENVIRONMENT. You?re never wrong to do the right thing and these 4 projects are all wrong for Texas. IND409-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND409-02 IND409-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND409-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND409-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND409-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Micki Cansino Gerardi
micki@gerardi.com
421 Davis Mountain Circle
Georgetown, TX 78633

IND409 Micki Cansino Gerardi, page 1 of 1

IND409-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14. The potential environmental and social impact of the Annova Project on the region, as well as the two other proposed LNG projects, is evaluated in the EIS.

IND409-2 See response to comment IND17-1.

IND409-3 See response to comment IND17-2.

IND409-4 See response to comment IND17-3.

IND409-5 See response to comment IND17-4.

IND409-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Ban these projects. If the people of Ireland and France banned fracking, why are we sacrificing our state for them! IND410-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND410-02 IND410-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND410-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND410-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND410-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

William Parham
jgparham@gmail.com
1909 Fairway Crossing Rd
Wylie, TX 75098

IND410 William Parham, page 1 of 1

IND410-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND410-2 See response to comment IND17-1.

IND410-3 See response to comment IND17-2.

IND410-4 See response to comment IND17-3.

IND410-5 See response to comment IND17-4.

IND410-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all these projects because of the environmental damage that is certain to follow. But on a personal level, my family will no longer be willing to vacation in this lovely part of Texas when the landscape is so disturbed. I?m sure local businesses will suffer loss of income and often loss of the business.
Why should beautiful Texas be sacrificed on the altar of dirty energy. IND411-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND411-02 IND411-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND411-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND411-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND411-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Suzanne Taylor
suzanne-taylor@att.net
1785 FM 2194
Greenville, TX 75401

IND411 Suzanne Taylor, page 1 of 1

IND411-1 Thank you for your comment.

IND411-2 See response to comment IND17-1.

IND411-3 See response to comment IND17-2.

IND411-4 See response to comment IND17-3.

IND411-5 See response to comment IND17-4.

IND411-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

keep the area pristine...no to fracking IND412-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND412-02 IND412-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND412-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND412-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND412-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Donna B Matthews
donnaiah@yahoo.com
12930 Wood Harbour Dr
Montgomery, TX 77356

IND412 Donna Matthews, page 1 of 1

IND412-1 The proposed Annova LNG Project does not include fracking.

IND412-2 See response to comment IND17-1.

IND412-3 See response to comment IND17-2.

IND412-4 See response to comment IND17-3.

IND412-5 See response to comment IND17-4.

IND412-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Having grown up in the South Texas farmland, it is horrible to see the devistation that has been wrought as a result of fracking. It is time to stop the rape of our land and the planer as a whole. Mother Earth deserves better from us. She gives us life. Without her health we will perish. IND413-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND413-02 IND413-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND413-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND413-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND413-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sybil Morgan
sybilmorgan349@gmail.com
3426 Buckhaven Dr
San Antonio, TX 78230

IND413 Sybil Morgan, page 1 of 1

IND413-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND413-2 See response to comment IND17-1.

IND413-3 See response to comment IND17-2.

IND413-4 See response to comment IND17-3.

IND413-5 See response to comment IND17-4.

IND413-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I strongly disapprove of the proposed LNG export terminal projects and pipelines in South Texas. IND414-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND414-02 IND414-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND414-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND414-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND414-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Maher
maher@pobox.com
PO Box 200274
Austin, TX 78720

IND414 Linda Maher, page 1 of 1

IND414-1 Thank you for your comment.

IND414-2 See response to comment IND17-1.

IND414-3 See response to comment IND17-2.

IND414-4 See response to comment IND17-3.

IND414-5 See response to comment IND17-4.

IND414-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This is too much environmental risk for the Texas Gulf coast. Please do not approve these projects. IND416-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND416-02 IND416-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND416-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND416-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND416-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Dennis Deacon
d_sonic1@yahoo.com
2615 Ferry Lndg
Sugar Land, TX 77478

IND416 Dennis Deacon, page 1 of 1

IND416-1 Thank you for your comment.

IND416-2 See response to comment IND17-1.

IND416-3 See response to comment IND17-2.

IND416-4 See response to comment IND17-3.

IND416-5 See response to comment IND17-4.

IND416-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking needs to stop. We are taking everything from the earth and soon there will be nothing left to take. Money MUST be invested in RENEWABLE options. Climate change is here. Anyone who denies this has their head buried in the sand. What is it going to take for people to wake up!!!??? IND417-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND417-02 IND417-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND417-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND417-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND417-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Amy Maxwell
amyhegg@hotmail.com
826 River Oaks Dr
El Paso, TX 79912

IND417 Amy Maxwell, page 1 of 1

IND417-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14. As stated in section 3.1 of the EIS, solar, wind, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND417-2 See response to comment IND17-1.

IND417-3 See response to comment IND17-2.

IND417-4 See response to comment IND17-3.

IND417-5 See response to comment IND17-4.

IND417-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking has been shown to be a risky endeavor. As a resident of the Rio Grande Valley, I do not want fracking to increase in the area out of concern for the local flora and fauna in the Gulf of Mexico and on the coast. The cultural sites in South Texas are also important to me, and so development on these portions of land is also of concern. IND419-01 IND419-02

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND419-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND419-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND419-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND419-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Brush
coppelia4509@gmail.com
900 McKee Dr.
Edinburg, TX 78539

IND419 Laura Brush, page 1 of 1

IND419-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14. Based on surveys and information known to date, including consultation with the Texas Historical Commission, the Annova LNG Project would not impact any known indigenous cultural sites. See further detail in section 4.10 of the EIS.

IND419-2 See response to comment IND17-1.

IND419-3 See response to comment IND17-2.

IND419-4 See response to comment IND17-3.

IND419-5 See response to comment IND17-4.

IND419-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop fracking in Texas! IND420-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND420-02 IND420-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND420-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND420-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND420-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Mary Hancock
maryhancock@keypointlearning.net
9124 River Falls Dr
Fort Worth, TX 76118

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:48
FEDERAL ENERGY
REGULATORY COMMISSION

IND420 Mary Hancock, page 1 of 1

IND420-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND420-2 See response to comment IND17-1.

IND420-3 See response to comment IND17-2.

IND420-4 See response to comment IND17-3.

IND420-5 See response to comment IND17-4.

IND420-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

STOP FRACKING! IND422-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND422-02 IND422-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND422-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND422-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND422-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Melissa Guynes
karalissa5@aol.com
3570 Durwood Drive
Beaumont, TX 77706

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:48
FEDERAL ENERGY
REGULATORY COMMISSION

IND422 Melissa Guynes, page 1 of 1

IND422-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND422-2 See response to comment IND17-1.

IND422-3 See response to comment IND17-2.

IND422-4 See response to comment IND17-3.

IND422-5 See response to comment IND17-4.

IND422-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking destroys the environment and the water. Clean Air and clean water are the most important things. We can?t have this and will resist! ? IND423-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND423-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND423-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND423-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND423-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND423-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jo Boies
k88piano_jol@yahoo.com
8207 Canoga Ave #238
Austin, TX 78724

IND423 Jo Boies, page 1 of 1

IND423-1 The proposed Annova LNG Project does not include fracking. See also response to comment CO0-14.

IND423-2 See response to comment IND17-1.

IND423-3 See response to comment IND17-2.

IND423-4 See response to comment IND17-3.

IND423-5 See response to comment IND17-4.

IND423-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop fracking on the coastline of Port Isabel, we need clean water and air IND424-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND424-02
would endanger communities across Texas, damage the local environment of South Texas, destroy IND424-03
Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista,
which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG IND424-04
resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would
increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change.
The terminals would also demand a massive pipeline network, and threaten families living along the IND424-05
pipeline route with leaks, spills, and pipeline explosions.

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. IND424-06
Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

For these reasons and many others, I am opposed to these projects.

Sincerely,

Yanira Aguirre
yanikmaya@gmail.com
2250 Ridgepoint dr
Austin, TX 78754

IND424 Yanira Aguirre, page 1 of 1

IND424-1 The proposed Annova LNG Project does not include fracking.

IND424-2 See response to comment IND17-1.

IND424-3 See response to comment IND17-2.

IND424-4 See response to comment IND17-3.

IND424-5 See response to comment IND17-4.

IND424-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Hi! This will affect businesses in a bad way. As a tax paying citizen I oppose this entirely. IND425-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND425-02 IND425-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, *which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG* resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND425-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND425-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND425-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Zara Barron
mariposa1284@gmail.com
2205 west walker street, 2117
League city, TX 77573

IND425 Zara Barron, page 1 of 1

IND425-1 Thank you for your comment. The potential impact on businesses and the local economy is evaluated in section 4.9 of the EIS.

IND425-2 See response to comment IND17-1.

IND425-3 See response to comment IND17-2.

IND425-4 See response to comment IND17-3.

IND425-5 See response to comment IND17-4.

IND425-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We will not give up on the destruction that you are doing to our planet. You are planning on running people's lives, homes and livelihoods and "just then walk away from the destruction that you caused counting your money" We not give up!!! IND426-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND426-02 IND426-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND426-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND426-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND426-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Robert Gary
rgary@satx.rr.com
16811 Summer Creek Dr
San Antonio, TX 78248

IND426 Robert Gary, page 1 of 1

IND426-1 Thank you for your comment.

IND426-2 See response to comment IND17-1.

IND426-3 See response to comment IND17-2.

IND426-4 See response to comment IND17-3.

IND426-5 See response to comment IND17-4.

IND426-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please preserve the beauty of the natural South Padre coastline from fracking, storage facilities, pipelines and flares. The alternative is much more beneficial...solar and wind power...something our coast is famous for. Let's use our other natural resources and preserve our native plants, animals and eco systems which include us and future generations!! IND427-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND427-02 would endanger communities across Texas, damage the local environment of South Texas, destroy IND427-03 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND427-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND427-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND427-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Patsy Sasek
mstrdsed@earthlink.net
3834 Highcliff Dr
San Antonio, TX 78218

IND427 Patsy Sasek, page 1 of 1

IND427-1 The Annova LNG Project does not include fracking. With respect to use of solar and wind power, as stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. Potential impact of the Project on plants, animals, and ecosystems, and potential socioeconomic impacts, are assessed in the EIS.

IND427-2 See response to comment IND17-1.

IND427-3 See response to comment IND17-2.

IND427-4 See response to comment IND17-3.

IND427-5 See response to comment IND17-4.

IND427-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We absolutely MUST move towards clean energy sources if we're to live on this planet in the next century. Projects like this disgust me and our children will hold you accountable! IND428-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND428-02 IND428-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND428-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND428-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND428-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cheyenne Weaver
cheyenneweaver@gmail.com
615 W Johanna St
Austin, TX 78704

IND428 Cheyenne Weaver, page 1 of 1

IND428-1 As stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND428-2 See response to comment IND17-1.

IND428-3 See response to comment IND17-2.

IND428-4 See response to comment IND17-3.

IND428-5 See response to comment IND17-4.

IND428-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

These are dangerous projects. We need to protect these communities and our environment. Rural and coastal Texas should not be abused. We need solar and wind and other clean options. IND429-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND429-02 IND429-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND429-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND429-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND429-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Carbonneau
laura.tex@gmail.com
2105 Brooklyn St
Austin, TX 78704

2019 FEB -4 P 3:49

IND429 Laura Carbonneau, page 1 of 1

IND429-1 As stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND429-2 See response to comment IND17-1.

IND429-3 See response to comment IND17-2.

IND429-4 See response to comment IND17-3.

IND429-5 See response to comment IND17-4.

IND429-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I?m a Texan , live in Houston, and I?m against this. I?ll vote and organize against anyone who is for it. IND430-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND430-02 IND430-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND430-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND430-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND430-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jacob Fakheri
jacobfakheri@gmail.com
608 Detering St
Houston, TX 77007

IND430 Jacob Fakheri, page 1 of 1

IND430-1 Thank you for your comment.

IND430-2 See response to comment IND17-1.

IND430-3 See response to comment IND17-2.

IND430-4 See response to comment IND17-3.

IND430-5 See response to comment IND17-4.

IND430-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

we should be caretakers of the earth, fracking has already caused earthquakes in the dfw area and we certainly don't need to create anymore quakes. IND431-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND431-02 IND431-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND431-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND431-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND431-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Judy Clark
judyclark853@att.net
853 Breezy Hill Ln
Rockwall, TX 75087

IND431 Judy Clark, page 1 of 1

IND431-1 The Annova LNG Project does not include fracking.

IND431-2 See response to comment IND17-1.

IND431-3 See response to comment IND17-2.

IND431-4 See response to comment IND17-3.

IND431-5 See response to comment IND17-4.

IND431-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This is the only planet we have. If we lose it, then thank you, Trump, you orange-faced asshole. IND432-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND432-02 IND432-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND432-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND432-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND432-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Haiden Wattley
h.a.wattley@gmail.com
312 Fouts Ave
Duncanville, TX 75137

IND432 Haiden Wattley, page 1 of 1

IND432-1 Thank you for your comment.

IND432-2 See response to comment IND17-1.

IND432-3 See response to comment IND17-2.

IND432-4 See response to comment IND17-3.

IND432-5 See response to comment IND17-4.

IND432-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texan, I?m deeply ashamed of the greed and selfishness of fossil fuels.
Transitioning to clean renewable energy would not only make more money, but also cut down on lawsuits and make a better world.
Fracking down at our beautiful coastline is ridiculous. Your flammable pipelines, storage tanks, and smoking flare stacks will be the death of those communities. IND433-01
Get smart.
Transition.
Save the world.

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND433-02 IND433-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND433-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND433-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND433-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Ms. Shawn Troxell
sbrown3348@yahoo.com
487 Dallas St
New Braunfels, TX 78130

IND433 Shawn Troxell, page 1 of 1

IND433-1 As stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND433-2 See response to comment IND17-1.

IND433-3 See response to comment IND17-2.

IND433-4 See response to comment IND17-3.

IND433-5 See response to comment IND17-4.

IND433-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking contaminates ground water and the water table is dangerous to human health IND434-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND434-02 IND434-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND434-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND434-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND434-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Choky Alvarez
carlosalva1755@gmail.com
7920 San Felipe Blvd
Austin, TX 78729

IND434 Choky Alvarez, page 1 of 1

IND434-1 The Annova LNG Project does not include fracking.

IND434-2 See response to comment IND17-1.

IND434-3 See response to comment IND17-2.

IND434-4 See response to comment IND17-3.

IND434-5 See response to comment IND17-4.

IND434-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

This is environmental injustice! IND435-01

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND435-02 IND435-03

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND435-04

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND435-05

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND435-06

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jane Lundquist
jane_lundquist@yahoo.com
10508 Mourning Dove Dr
Austin, TX 78750

IND435 Jane Lundquist, page 1 of 1

IND435-1 Thank you for your comment.

IND435-2 See response to comment IND17-1.

IND435-3 See response to comment IND17-2.

IND435-4 See response to comment IND17-3.

IND435-5 See response to comment IND17-4.

IND435-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking MUST stop!!! We don't need the oil....put the money into renewable energy!! IND437-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND437-2 IND437-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND437-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND437-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND437-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sharon Daly
sjdpiso@sbcglobal.net
1509 Elton Lane
Austin, TX 78703

IND437 Sharon Daly, page 1 of 1

IND437-1 The Annova LNG Project does not include fracking. As stated in section 3.1 of the EIS, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND437-2 See response to comment IND17-1.

IND437-3 See response to comment IND17-2.

IND437-4 See response to comment IND17-3.

IND437-5 See response to comment IND17-4.

IND437-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is not only dangerous and distroys the land environment but is also known to cause quakes. If you remove subterrane material, the surrounding under ground is no longer supported. Common , basic science! Pollution, risk of oil spills- why are you allowing our great state, people, plants, wildlife to suffer???? Why does money trump common sense and me and
my future family? What about tourism? What about marine life? Please stop the fracking efforts in our great state! Please don't be part of destroying our beautiful state. IND438-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND438-2 IND438-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND438-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND438-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND438-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Gail Williams
wgail@att.net
9231 Tree Vlg
San Antonio, TX 78250

FILED
SECRETARY OF THE
2019 FEB -4 P 4:13
REGULATORY COMMISSION

IND438 Gail Williams, page 1 of 1

IND438-1 The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND438-2 See response to comment IND17-1.

IND438-3 See response to comment IND17-2.

IND438-4 See response to comment IND17-3.

IND438-5 See response to comment IND17-4.

IND438-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is not good for anyone except the oil and gas industry IND439-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND439-2 IND439-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND439-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND439-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND439-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Robert Bauer
backfrdead@yahoo.com
645 Choctaw East Cir
Sherman, TX 75092

IND439 Robert Bauer, page 1 of 1

IND439-1 The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND439-2 See response to comment IND17-1.

IND439-3 See response to comment IND17-2.

IND439-4 See response to comment IND17-3.

IND439-5 See response to comment IND17-4.

IND439-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is not a long-term solution for any life form. IND440-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND440-2 IND440-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND440-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND440-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND440-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Deena Berg
deenaberg@utexas.edu
10417 Doering Ln
Austin, TX 78750

IND440 Deena Berg, page 1 of 1

IND440-1 The Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND440-2 See response to comment IND17-1.

IND440-3 See response to comment IND17-2.

IND440-4 See response to comment IND17-3.

IND440-5 See response to comment IND17-4.

IND440-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texas resident and more particularly the father of a daughter whose family lives in south Texas, the negative environmental consequences of these projects is particularly objectionable to me personally. IND441-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND441-2 IND441-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND441-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND441-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND441-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Roger Knudson
rogerknudson@gmail.com
8749 Southwestern Blvd Apt 6311
Dallas, TX 75206

IND441 Roger Knudson, page 1 of 1

IND441-1 Thank you for your comment.

IND441-2 See response to comment IND17-1.

IND441-3 See response to comment IND17-2.

IND441-4 See response to comment IND17-3.

IND441-5 See response to comment IND17-4.

IND441-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

DO NOT RUIN THE PRISTINE BEAUTY OF THE PORT ISABEL / SOUTH PADRE ISLAND AREA WITH LNG TERMINALS!!!!! WE NEED TO PRESERVE THIS BEAUTIFUL AREA NOT ONLY FOR OURSELVES BUT FOR FUTURE GENERATIONS!!!! IND442-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND442-2 IND442-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND442-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND442-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND442-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Bonnie Clements
bonnie.clements@att.net
4800 Lamonte Lane #2708
Houston, TX 77092

IND442 Bonnie Clements, page 1 of 1

IND442-1 Thank you for your comment.

IND442-2 See response to comment IND17-1.

IND442-3 See response to comment IND17-2.

IND442-4 See response to comment IND17-3.

IND442-5 See response to comment IND17-4.

IND442-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

DO NOT SACRIFICE TEXAS COMMUNITIES AND LAND FOR CORPORATE GREED! The proposed terminals would bulldoze sacred Indigenous culture sites in South Texas and ruin the pristine coastline of South Padre Island, TX to build flammable pipelines, storage tanks, and smoking flare stacks. DO NOT SACRIFICE TEXAS FOR PROFIT! IND443-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND443-2 IND443-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND443-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND443-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND443-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Linda Fielder
malankad@hotmail.com
2234 Carmel Dr
Carrollton, TX 75006

IND443 Linda Fielder, page 1 of 1

IND443-1 Based on surveys and information known to date, including consultation with the Texas Historical Commission, the Annova LNG Project would not impact any known indigenous cultural sites. See further detail in section 4.10 of the EIS. With respect to potential impact on the coastline of South Padre Island, the Project is located about 8 miles from the island.

IND443-2 See response to comment IND17-1.

IND443-3 See response to comment IND17-2.

IND443-4 See response to comment IND17-3.

IND443-5 See response to comment IND17-4.

IND443-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not sacrifice the non-monetary treasures of Texas for financial gain. God didn't give us Earth to consistently rape! IND444-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND444-2 IND444-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND444-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND444-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND444-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Susan Bussa
susan.bussa@att.net
410 Concho St
Lockhart, TX 78644

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4: 10
FEDERAL ENERGY
REGULATORY COMMISSION

IND444 Susan Bussa, page 1 of 1

IND444-1 Thank you for your comment.

IND444-2 See response to comment IND17-1.

IND444-3 See response to comment IND17-2.

IND444-4 See response to comment IND17-3.

IND444-5 See response to comment IND17-4.

IND444-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not sell the environment and our future for the short term profit of a few. IND445-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND445-2 IND445-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND445-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND445-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND445-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Margaret Schulenberg
msch@austin.rr.com
300 Pecan Ln
Round Rock, TX 78664

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 4:10
FEDERAL ENERGY
REGULATORY COMMISSION

IND445 Margaret Schulenberg, page 1 of 1

IND445-1 Thank you for your comment.

IND445-2 See response to comment IND17-1.

IND445-3 See response to comment IND17-2.

IND445-4 See response to comment IND17-3.

IND445-5 See response to comment IND17-4.

IND445-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do not trade our beautiful coastline for a big paycheck to your oil company. These resources and land belong in the public conservancy. IND446-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND446-2 IND446-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND446-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND446-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND446-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Samuela Walker
samuelasw@gmail.com
10107 Hill Country Skyline
Dripping Springs, TX 78620

IND446 Samuela Walker, page 1 of 1

IND446-1 Thank you for your comment.

IND446-2 See response to comment IND17-1.

IND446-3 See response to comment IND17-2.

IND446-4 See response to comment IND17-3.

IND446-5 See response to comment IND17-4.

IND446-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do the right thing for our children and their children, and do not build these pipelines. IND447-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND447-2 IND447-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND447-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND447-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND447-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Rebecca Mccuistion
shinypenny@hotmail.com
435 Birch Ln
Richardson, TX 75081

IND447 Rebecca Mccuistion, page 1 of 1

IND447-1 The proposed Annova LNG Project does not include a pipeline. A non-jurisdictional pipeline would provide gas to the Annova Project

IND447-2 See response to comment IND17-1.

IND447-3 See response to comment IND17-2.

IND447-4 See response to comment IND17-3.

IND447-5 See response to comment IND17-4.

IND447-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Do we really need to sacrifice the health and future of our children for this?...other ways can serve us better! IND448-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND448-2 IND448-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND448-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND448-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND448-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Clif Jordan
clifj55@gmail.com
5601 Cojimar Dr
McKinney, TX 75070

IND448 Clif Jordan, page 1 of 1

IND448-1 Thank you for your comment. See our assessment of Project alternatives in section 3 of the EIS.

IND448-2 See response to comment IND17-1.

IND448-3 See response to comment IND17-2.

IND448-4 See response to comment IND17-3.

IND448-5 See response to comment IND17-4.

IND448-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

DON?T MESS WITH TEXAS!
Stop fracking. Faze out big oil replacing it with intelligent solar, wind, hydro power and keep TEXAS alive. IND449-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND449-2 IND449-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND449-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND449-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND449-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Debbie Hyde
tractorgirl7@gmail.com
12 Sentinel Hl
Austin, TX 78737

IND449 Debbie Hyde, page 1 of 1

IND449-1 The Annova LNG Project does not include fracking. With respect to use of solar, wind, and other renewable energy, as stated in section 3.1 of the EIS, renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND449-2 See response to comment IND17-1.

IND449-3 See response to comment IND17-2.

IND449-4 See response to comment IND17-3.

IND449-5 See response to comment IND17-4.

IND449-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Does people lives and there way of living matter to corporate companies ? Corporate companies are just like piranhas do not care who's in the line of fire they just come in and destroy. It's all about money and it's really sad that people lives don't matter. Where I live and Humble Texas the hospital District on over 20 acres of land in front of my house it was a wooded area full of wildlife beautiful wildlife they destroyed it all only to put a huge retention pond in front of my house and every time a storm come I panicked because if it overfill from other areas in Humble water flows into the retention Pond and if it overfill then guess who floods ME! So I'm standing in agreement do not destroy land property or people way of living I'm sure corporate companies can take other measures to get their job done besides coming in to kill steal and destroy what GOD has made beautiful and HIS eyes ! ?????

IND450-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

IND450-2
IND450-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

IND450-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions.

IND450-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

IND450-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sharon Haywood
sharon56haywood@gmail.com
3455 FM 1960 Rd W
Humble, TX 77338

IND450 Sharon Haywood, page 1 of 1

IND450-1 Thank you for your comment.

IND450-2 See response to comment IND17-1.

IND450-3 See response to comment IND17-2.

IND450-4 See response to comment IND17-3.

IND450-5 See response to comment IND17-4.

IND450-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don?t mess with Texas... please keep our state beautiful. Let?s find other solutions to energy since the tools are readily available now. IND451-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND451-2 IND451-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND451-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND451-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND451-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

CJ Vaughn
cjixzle3@gmail.com
8043 FM 322
Palestine, TX 75801

IND451 CJ Vaughn, page 1 of 1

IND451-1 As stated in section 3.1 of the EIS, wind, solar, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND451-2 See response to comment IND17-1.

IND451-3 See response to comment IND17-2.

IND451-4 See response to comment IND17-3.

IND451-5 See response to comment IND17-4.

IND451-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't mess with Texas! IND452-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND452-2 IND452-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND452-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND452-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND452-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kay Mcbrayer
richardkay1103@gmail.com
2600 Hunter Rd Apt 3311
San Marcos, TX 78666

IND452 Kay Mcbrayer, page 1 of 1

IND452-1 Thank you for your comment.

IND452-2 See response to comment IND17-1.

IND452-3 See response to comment IND17-2.

IND452-4 See response to comment IND17-3.

IND452-5 See response to comment IND17-4.

IND452-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't mess with Texas!!! IND453-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND453-2 IND453-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND453-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND453-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND453-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Judith Stueve
judithstueve@gmail.com
228 Pine Canyon Dr
Smithville, TX 78957

IND453 Judith Stueve, page 1 of 1

IND453-1 Thank you for your comment.

IND453-2 See response to comment IND17-1.

IND453-3 See response to comment IND17-2.

IND453-4 See response to comment IND17-3.

IND453-5 See response to comment IND17-4.

IND453-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't mess with Texas. This is a dangerous and destructive industry. Let's cut our consumption and save South Texas beaches, businesses and quality of life. IND454-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND454-2 IND454-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND454-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND454-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND454-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Pat Johnson
pjohnson@cvctx.com
PO Box 4
Fayetteville, TX 78940

IND454 Pat Johnson, page 1 of 1

IND454-1 Thank you for your comment.

IND454-2 See response to comment IND17-1.

IND454-3 See response to comment IND17-2.

IND454-4 See response to comment IND17-3.

IND454-5 See response to comment IND17-4.

IND454-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't relegate these people to second class citizenship where they have no say in their quality of life. IND455-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND455-2 IND455-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND455-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND455-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND455-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Sara Straube
sarast.straube@gmail.com
3014 Oak Sprawl St
San Antonio, TX 78231

IND455 Sara Straube, page 1 of 1

IND455-1 Thank you for your comment.

IND455-2 See response to comment IND17-1.

IND455-3 See response to comment IND17-2.

IND455-4 See response to comment IND17-3.

IND455-5 See response to comment IND17-4.

IND455-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don't sacrifice Texas coastal areas for short term fossil fuel profits, protect these fragile lands for people, animals, and plants. IND456-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND456-2 IND456-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND456-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND456-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND456-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Claud & Sharon Bramblett
sbramblett@utexas.edu
4612 Duval St
Austin, TX 78751

IND456 Claud & Sharon Bramblett, page 1 of 1

IND456-1 Thank you for your comment.

IND456-2 See response to comment IND17-1.

IND456-3 See response to comment IND17-2.

IND456-4 See response to comment IND17-3.

IND456-5 See response to comment IND17-4.

IND456-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am totally opposed to any project that could possibly pollute, either physically or visually, our precious South Texas coastline. Just look at what has happened to the Eastern Texas Gulf Shore around the Port Arthur area to see what can happen. We must not sacrifice our environment for slightly cheaper energy.!!! IND4571

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND457-2 IND457-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND457-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND457-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND457-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

James Clark
jimjanclark@gmail.com
310 Hunters Glen Dr
Lufkin, TX 75904

IND457 James Clark, page 1 of 1

IND457-1 Thank you for your comment.

IND457-2 See response to comment IND17-1.

IND457-3 See response to comment IND17-2.

IND457-4 See response to comment IND17-3.

IND457-5 See response to comment IND17-4.

IND457-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am a concerned Texan opposed to all 4 pinelines and LNG projects. Texas is not the world frack zone. We need to invest in clean energy for our future and our children. Fracking waste water is toxic and fracking pollutes the air. Our Gulf coast is beautiful and needs to stay this way for future generations. Doesn't need to be sold off to others for greed and money. We need an clean energy revolution . No more fracking. France shouldn't Frack Texas! IND458-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND458-2 IND458-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND458-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND458-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND458-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Crystal Bowling
crystal@oakstreetnursery.com
408 N Morris St
McKinney, TX 75069

2019 Feb - 4

IND458 Crystal Bowling, page 1 of 1

IND458-1 The Annova LNG Project does not include fracking. With respect to fracking in other parts of Texas, see response to comment IND9-14. As stated in section 3.1 of the EIS, solar, wind or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND458-2 See response to comment IND17-1.

IND458-3 See response to comment IND17-2.

IND458-4 See response to comment IND17-3.

IND458-5 See response to comment IND17-4.

IND458-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I agree with you completely. I live in El Paso, but I understand that this affects all of us. I pray that the Commission comes to its senses. IND459-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND459-2 IND459-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND459-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. *The terminals would also demand a massive pipeline network, and threaten families living along the* pipeline route with leaks, spills, and pipeline explosions. IND459-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND459-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Carina Ramirez
crami162@epcc.edu
240 Smith Rd
El Paso, TX 79907

IND459 Carina Ramirez, page 1 of 1

IND459-1 Thank you for your comment.

IND459-2 See response to comment IND17-1.

IND459-3 See response to comment IND17-2.

IND459-4 See response to comment IND17-3.

IND459-5 See response to comment IND17-4.

IND459-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please protect deep south Texas form the dangers of fracking. Please don't allow this area to be polluted or be subjected to the risks of earthquakes and water pollution. Please don't destroy sacred sites or allow the beauty or the Texas coastline to be scarred with pipelines, tanks and other ugly things needed to support fracking. I's rather pay higher gas prices (And I drive a full-size pick up truck!) then see the beauty of South Texas and its beautiful coastline destroyed. Please listen the residents of Texas. We are asking you to NOT DESTROY the natural beauty of our state. Thanks for listening, Pam Sohan. IND460-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND460-2 IND460-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND460-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND460-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND460-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Pam Sohan
gbsgirl4ever@aol.com
222 Autumn Chase
New Braunfels, TX 78132

IND460 Pam Sohan, page 1 of 1

IND460-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14. Based on surveys and information known to date, including consultation with the Texas Historical Commission, the Annova LNG Project would not impact any known sacred cultural sites. See further detail in section 4.10 of the EIS.

IND460-2 See response to comment IND17-1.

IND460-3 See response to comment IND17-2.

IND460-4 See response to comment IND17-3.

IND460-5 See response to comment IND17-4.

IND460-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Stop FRACKING! The long term effects are not worth it! IND461-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND461-2 IND461-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND461-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND461-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND461-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Caroline Ysasaga
cysasaga@hotmail.com
5632 87th St
Lubbock, TX 79424

IND461 Caroline Ysasaga, page 1 of 1

IND461-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND461-2 See response to comment IND17-1.

IND461-3 See response to comment IND17-2.

IND461-4 See response to comment IND17-3.

IND461-5 See response to comment IND17-4.

IND461-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND462-1 IND462-2

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND462-3

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND462-4

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. IND462-5

Sincerely,

Kim Sanders George
kim.sanders.george@live.com
330 Spinner Rd
Desoto, TX 75115

IND462 Kim Sanders George, page 1 of 1

IND462-1 See response to comment IND17-1.

IND462-2 See response to comment IND17-2.

IND462-3 See response to comment IND17-3.

IND462-4 See response to comment IND17-4.

IND462-5 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND463-1 IND463-2

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND463-3

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND463-4 IND463-5

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND463-6

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND463-7

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND463-8

For these reasons and many others, I am opposed to these projects.

Sincerely,

Wanda Kirkpatrick
wrkirkpatrick@satx.rr.com
3326 Litchfield Dr
San Antonio, TX 78230

IND463 Wanda Kirkpatrick, page 1 of 1

IND463-1 See response to comment IND17-1.

IND463-2 See response to comment IND17-2.

IND463-3 See response to comment IND17-3.

IND463-4 See response to comment IND17-1.

IND463-5 See response to comment IND17-2.

IND463-6 See response to comment IND17-3.

IND463-7 See response to comment IND17-4.

IND463-8 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I have watched in horror for years as small communities have had fracking forced down their throats by large conglomerates who have politicians bought and paid for. The case of Denton TX in June, 2015 still stands out as an outrage. Here is an excerpt from the article I read about it: IND464-1
"Denton City Council repeals fracking ban
BY MAX B. BAKER
maxbaker@star-telegram.com
June 16, 2015 11:10 AM
Updated June 17, 2015 10:25 AM
Denton?s hydraulic fracturing ban was passed with great fanfare in November, but early Wednesday morning the City Council was forced to take it off the books because of a new state law and pending lawsuits.
The council voted 6-1 to repeal the ordinance because it had been rendered unenforceable by House Bill 40, a law signed by Gov. Greg Abbott last month that prohibited cities from adopting such bans."
I am utterly disgusted that fossil fuel companies can override the will of communities who don't want to have anything to do with fracking, drilling or any other health threatening destruction to the land or water, on or near where they live. This must be stopped in its tracks for the sake of all who want to remain healthy, not to mention the near future of planet earth.
Enough has been more than enough. Stop this plan and do it today. I'm not requesting this.
Most Sincerely,
Rick Gordon

IND464 Rick Gordon, page 1 of 1

IND464-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We are destroying our futures to benefit wealthy owners of obsolete technology. Stop fracking now. IND465-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND465-2 IND465-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND465-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND465-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND465-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Susan Finley
sellis2@austin.rr.com
1102 Hunters Creek Dr
Cedar Park, TX 78613

IND465 Susan Finley, page 1 of 1

IND465-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND465-2 See response to comment IND17-1.

IND465-3 See response to comment IND17-2.

IND465-4 See response to comment IND17-3.

IND465-5 See response to comment IND17-4.

IND465-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No more Fracking! Danger to our people and our planet! IND466-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND466-2 IND466-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND466-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND466-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND466-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Janice Kidd
jgbkidd@yahoo.com
930 Ravencroft Dr
Garland, TX 75043

IND466 Janice Kidd, page 1 of 1

IND466-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND466-2 See response to comment IND17-1.

IND466-3 See response to comment IND17-2.

IND466-4 See response to comment IND17-3.

IND466-5 See response to comment IND17-4.

IND466-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Central Texan who loves to visit the beautiful beaches at Padre Island I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND467-1 IND467-2

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND467-3

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND467-4

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. IND467-5

Sincerely,

Catherine Croom
catbc123@gmail.com
30412 Heimer Cv
Bulverde, TX 78163

IND467 Catherine Croom, page 1 of 1

IND467-1 See response to comment IND17-1.

IND467-2 See response to comment IND17-2.

IND467-3 See response to comment IND17-3.

IND467-4 See response to comment IND17-4.

IND467-5 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

With this current administration nothing will be done because their pockets are being lined to ignore it. IND468-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND468-2 IND468-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND468-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND468-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND468-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Harvey Collen
harveycollen927@gmail.com
15006 Big Oak Bay Rd
Tyler, TX 75707

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:50
FEDERAL ENERGY
REGULATORY COMMISSION

IND468 Harvey Collen, page 1 of 1

IND468-1 Thank you for your comment.

IND468-2 See response to comment IND17-1.

IND468-3 See response to comment IND17-2.

IND468-4 See response to comment IND17-3.

IND468-5 See response to comment IND17-4.

IND468-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I live in Texas and I am sad to hear that fracking is proposed for this recreational .area. Please say NO to the terminals and pipeline. Nancy Walsh IND469-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND469-2 IND469-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND469-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND469-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND469-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Nancy Walsh
nancylwalsh@att.net
14811 Huebner Rd Apt 1103
San Antonio, TX 78231

IND469 Nancy Walsh, page 1 of 1

IND469-1 The proposed Annova LNG Project does not include fracking.

IND469-2 See response to comment IND17-1.

IND469-3 See response to comment IND17-2.

IND469-4 See response to comment IND17-3.

IND469-5 See response to comment IND17-4.

IND469-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND470-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND470-2 IND470-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND470-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND470-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND470-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Fatimah Quraali
fatima.karaali@yahoo.com
2921 Briarpark Dr Apt 122
Houston, TX 77042

IND470 Fatimah Quraali, page 1 of 1

IND470-1 Thank you for your comment.

IND470-2 See response to comment IND17-1.

IND470-3 See response to comment IND17-2.

IND470-4 See response to comment IND17-3.

IND470-5 See response to comment IND17-4.

IND470-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Hey!!
The construction of these proposed LNG projects would bulldoze the pristine coastline of South Padre Island and pollute my community to build flammable pipelines, storage tanks, and smoking flare stacks. Don't do it, Damn it!! IND471-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND471-2 IND471-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND471-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND471-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND71-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cris Nelson
cristex@juno.com
17125 Rocky Ridge Rd
Austin, TX 78734

IND471 Cris Nelson, page 1 of 1

IND471-1 Thank you for your comment. The proposed Annova LNG Project is about 8 miles from South Padre Island.

IND471-2 See response to comment IND17-1.

IND471-3 See response to comment IND17-2.

IND471-4 See response to comment IND17-3.

IND471-5 See response to comment IND17-4.

IND471-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I visited Texas first from my home in Indiana and then from my homes in Alaska and Virginia. Now that I have moved to warmer climes, I find myself opposing all four of these projects across sacred Native American lands and into beautiful South Padre Island one of the most beautiful vacation destinations across the Gulf of Mexico. IND472-1

I think it is time to end the use of Texas as a never expanding sacrifice zone for world wide energy, carbon based energy that flies in the face of the recent report by the Trump administration on the dangers of continued burning of fossil fuels and release of carbon into the warming atmosphere and changing climate. It is especially frustrating to have financing for the projects and intended markets for the products originating from countries that have, themself, rejected fracking and the destruction that the production promises. IND472-2

Finally, I want to join my opposition to that of the communities in South Padre who have issued formal opposition to all four projects and to the construction of the massive infrastructure that will threaten their lives and livlihoods. IND472-3

Thank you for considering my comment,
David L. Allison

IND472 David Allison, page 1 of 1

IND472-1 Thank you for your comment.

IND472-2 Thank you for your comment.

IND472-3 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Don?t frack with Texas! IND473-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND473-2 IND473-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND473-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND473-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND473-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Roberta Beckman
rbeckmaninc@aol.com
3707 Lonniewood Dr
Houston, TX 77059

IND473 Roberta Beckman, page 1 of 1

IND473-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND473-2 See response to comment IND17-1.

IND473-3 See response to comment IND17-2.

IND473-4 See response to comment IND17-3.

IND473-5 See response to comment IND17-4.

IND473-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I voted for Beto just because of this issue. I am against fracking and have read about why fracking is causing damage to our groundwater, etc. Please politicians, listen to "your people", your constituents. Société Générale needs to be ashamed of themselves.
Please do not allow this fracking to keep occurring. It pains me to know that damage will occur in the local environment of South Texas.
Thank you. IND474-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND474-2 IND474-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND474-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND474-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND474-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Tabor
tabor-huerta@iname.com
2715 Crownspoint Dr
Austin, TX 78748

2015 FEB -4 P 3:50

IND474 Laura Tabor, page 1 of 1

IND474-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND474-2 See response to comment IND17-1.

IND474-3 See response to comment IND17-2.

IND474-4 See response to comment IND17-3.

IND474-5 See response to comment IND17-4.

IND474-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Lilli Pell
300 Caliche Rd
PO Box 591
Wimberley
Texas
Subject
Comments on proposed LNG export terminal projects and pipelines in South Texas
I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND475-1 IND475-2
The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND475-3
Sincerely,

Lilli Pell
lilli@lillipell.com
PO Box 591
Wimberley, TX 78676

IND475 Lilli Pell, page 1 of 1

IND475-1 See response to comment IND17-1.

IND475-2 See response to comment IND17-2.

IND475-3 See response to comment IND17-3.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects as they will harm communities across Texas by damaging the beauty of our South Texas environment, destroying indigenous cultural sites, and harm local industries like fishing, shrimping and eco-tourism vital to the sustainability of the economy in the area. IND476-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND476-2 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND476-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND476-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND476-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND476-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Lucia Carter
jlcarter0208@aol.com
807 Doubles Ct
Harker Heights, TX 76548

IND476 Lucia Carter, page 1 of 1

IND476-1 See response to comment IND17-1.

IND476-2 See response to comment IND17-1.

IND476-3 See response to comment IND17-2.

IND476-4 See response to comment IND17-3.

IND476-5 See response to comment IND17-4.

IND476-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

NO FRACKING, anywhere, any time. Stop it! IND477-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND477-2 IND477-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND477-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND477-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND477-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Elizabeth Whitlow
emn1849@austin.rr.com
1509 Parkway
Austin, TX 78703

IND477 Elizabeth Whitlow, page 1 of 1

IND477-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND477-2 See response to comment IND17-1.

IND477-3 See response to comment IND17-2.

IND477-4 See response to comment IND17-3.

IND477-5 See response to comment IND17-4.

IND477-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

My family has been in Texas for a long time. My great-grandfather was born near Glen Rose in the Empire of Mexico (Second Mexican Empire). We took part in the Texas Revolution. We were here when Texas became an independent nation and when Texas became a state. The city of Stephenville was named after my great-uncle John (John M. Stephen).
In the past 35 years, with the discovery of the Barnett Shale (natural gas field), the residents of some 25 counties in the area of the Barnett Shale have had their well-water poisoned by greedy, selfish, amoral petroleum companies like Mitchell Energy and Devon Energy, who ruined a huge swath of Texas land with .fracturing wells ("fracking"). All members of my large, extended family have had to abandon their homes and their farms and ranches and move out of the Barnett Shale region, because the water is toxic and good for nothing. IND478-1
Anyone who does not believe that fracking poisons the groundwater need only ask Donald Trump. I can assure you that Trump will state unequivocally that fracking is perfectly safe and that it does no harm ... and we all know that everything Trump says is either a baldfaced lie or unbridled ignorance, and that should stand up as proof positive that fracking poisons the land and water.

Sincerely,

Stephen Brown
sgb-wobeck@sbcglobal.net
7159 Radcliff Dr
Dallas, TX 75227

IND478 Stephen Brown, page 1 of 1

IND478-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND479-1
Do not sacrifice our coastal communities!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND479-2
indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND479-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND479-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND479-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND479-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Stacey Schodek
sschodek@outlook.com
8515 Cotton Dr
Richmond, TX 77469

IND479 Stacey Schodek, page 1 of 1

IND479-1 See response to comment IND17-1.

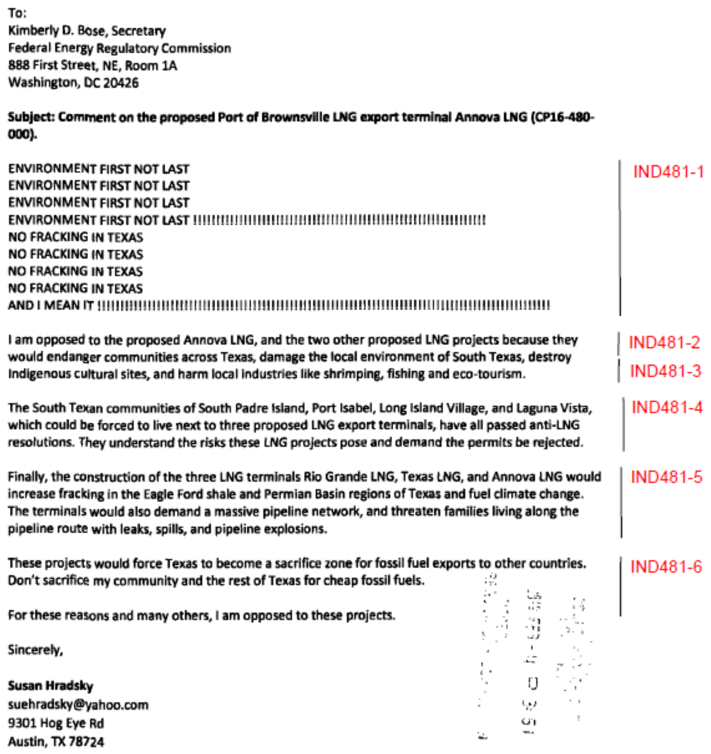
IND479-2 See response to comment IND17-1.

IND479-3 See response to comment IND17-2.

IND479-4 See response to comment IND17-3.

IND479-5 See response to comment IND17-4.

IND479-6 See response to comment IND17-5.



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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

IND481-1

ENVIRONMENT FIRST NOT LAST
ENVIRONMENT FIRST NOT LAST
ENVIRONMENT FIRST NOT LAST
ENVIRONMENT FIRST NOT LAST !!
NO FRACKING IN TEXAS
NO FRACKING IN TEXAS
NO FRACKING IN TEXAS
NO FRACKING IN TEXAS
AND I MEAN IT !!!

IND481-2 IND481-3

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

IND481-4

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

IND481-5

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions.

IND481-6

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

For these reasons and many others, I am opposed to these projects.

Sincerely,

Susan Hradsky
suehradsky@yahoo.com
9301 Hog Eye Rd
Austin, TX 78724

IND481 Susan Hradsky, page 1 of 1

IND481-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND481-2 See response to comment IND17-1.

IND481-3 See response to comment IND17-2.

IND481-4 See response to comment IND17-3.

IND481-5 See response to comment IND17-4.

IND481-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Hello. I am writing in opposition to the 4 proposed fracking projects in south Texas: Rio Grande LNG, Rio Bravo Pipeline, Annova LNG, and Texas LNG. These projects not only threaten our land and ecosystem but also marine life and indiginous cultural sites. Several communities that are directly impacted by these proposed projects have adopted anti-LNG resolutions and have rightfully requested that the permits for these projects be rejected. Are you going to ignore the needs of Texas citizens to accommodate the foreign interest of Société Générale, a major French bank, who is the financial adviser for the Rio Grande LNG and Rio Bravo Pipeline projects? IND482-1 IND482-2

The massive excavation required to lay pipe will destroy our land and devastate our shores. The potential for spills, leaks, and explosions threaten our citizens and wildlife. All the while, countries like Ireland and France who are the recipients of this Texas fossil fuel have benefitted, as they are able to preserve their own ecosystems since they have banned fracking in their countries because of the known dangers of this industry. Is this hypocrisy at its best?! IND482-3 IND482-4

Please put Texas FIRST! Protect our people, wildlife, and lands. Do not place big business or the needs of other countries ahead of the needs in our great state of Texas

For these reasons and many others, I am opposed to these projects.

Sincerely,

Laura Sander
ot_nolimits@sbcglobal.net
1636 Camino Bello Ln
El Paso, TX 79902

IND482 Laura Sander, page 1 of 1

IND482-1 See response to comment IND17-1.

IND482-2 See response to comment IND17-2.

IND482-3 See response to comment IND17-3.

IND482-4 See response to comment IND17-4.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a Texan, I care more about small businesses and preserving the environment than I do about oil company profits. No more fracking! IND483-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND483-2 IND483-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND483-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND483-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND483-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Diana Wheeler
dwheeler@aya.yale.edu
2604 W 49th St
Austin, TX 78731

IND483 Diana Wheeler, page 1 of 1

IND483-1 Thank you for your comment. The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND483-2 See response to comment IND17-1.

IND483-3 See response to comment IND17-2.

IND483-4 See response to comment IND17-3.

IND483-5 See response to comment IND17-4.

IND483-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please stop all fracking and quit killing our people and destroying our country! IND484-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND484-2 IND484-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, *which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG* resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND484-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND484-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND484-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Liz LaFour
lizer123@yahoo.com
4324 County Road 126
Van Vleck, TX 77482

IND484 Liz LaFour, page 1 of 1

IND484-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND484-2 See response to comment IND17-1.

IND484-3 See response to comment IND17-2.

IND484-4 See response to comment IND17-3.

IND484-5 See response to comment IND17-4.

IND484-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I oppose fracking, the science has been done it harms humans, animals and everything else on this planet. Stop companies that only care about how much and how fast they can make money. They need to be held accountable. IND485-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND485-2 IND485-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND485-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND485-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. *Don't sacrifice my community and the rest of Texas for cheap fossil fuels.* IND485-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Diana Gamez
artemisapril@outlook.com
7603 Lunar Dr
Austin, TX 78745

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:52
FEDERAL ENERGY
REGULATORY COMMISSION

IND485 Diana Gamez, page 1 of 1

IND485-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND485-2 See response to comment IND17-1.

IND485-3 See response to comment IND17-2.

IND485-4 See response to comment IND17-3.

IND485-5 See response to comment IND17-4.

IND485-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Leave our land and coastline alone. Fracking continues to undermine the land surface causing multitudes of problems on every level. IND486-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND486-2 IND486-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND486-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND486-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND486-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Patricia Thomson
pjthrt@aol.com
127 Shoreacres Blvd
LaPorte, TX 77571

IND486 Patricia Thomson, page 1 of 1

IND486-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND486-2 See response to comment IND17-1.

IND486-3 See response to comment IND17-2.

IND486-4 See response to comment IND17-3.

IND486-5 See response to comment IND17-4.

IND486-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

No Fracking, No LNG! No more pollution. Poor air quality is already worsening symptoms of asthma, allergies AND MORE. Why must you continue to destroy the planet God gave us to care for? Some things are not replaceable by money, can't eat it, can't cuddle it. NO NO NO NO! IND487-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND487-2 IND487-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND487-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND487-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND487-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Fran Wessel
storyteller101@juno.com
1907 Meadow Way Dr
Mission, TX 78572

IND487 Fran Wessel, page 1 of 1

IND487-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND487-2 See response to comment IND17-1.

IND487-3 See response to comment IND17-2.

IND487-4 See response to comment IND17-3.

IND487-5 See response to comment IND17-4.

IND487-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is bad for everyone except those who are making money at our expense, and who don't care about the future. I wish they would think about their grandchildren. IND488-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND488-2 IND488-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND488-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND488-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND488-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Jerry Bailey
gbailey@satx.rr.com
5603 Ben Casey Dr
San Antonio, TX 78240

2019 FEB -4 P 3:52

IND488 Jerry Bailey, page 1 of 1

IND488-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND488-2 See response to comment IND17-1.

IND488-3 See response to comment IND17-2.

IND488-4 See response to comment IND17-3.

IND488-5 See response to comment IND17-4.

IND488-6 See response to comment IND17-5.

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

2019 FEB -4 P 3:52

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

As a frequent traveler to South Texas I oppose LNG gas export terminal projects and pipelines. Fracked gas intrastructure will : IND489-1
-destroy the valuable tourist industry,
-cultural sites
- the fishing industry
- devalue land and homes in the area
- have a negative impact on the wildlife in the area.
-contribute to rising sea levels and climate change
#BreakTheFrackCycle!

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND489-2 IND489-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND489-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND489-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND489-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

L. Fielder
malankad@hotmail.com
2234 Carmel Dr
Carrollton, TX 75006

IND489 L. Fielder, page 1 of 1

IND489-1 Thank you for your comment. With respect to fracked gas infrastructure, the proposed Annova LNG Project does not include fracking, and we do not address the potential upstream sources of natural gas. See also response to comment IND9-14. The concerns identified in this comment are all address in the EIS.

IND489-2 See response to comment IND17-1.

IND489-3 See response to comment IND17-2.

IND489-4 See response to comment IND17-3.

IND489-5 See response to comment IND17-4.

IND489-6 See response to comment IND17-5.

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

FILED
SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:52

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND490-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND490-2 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND490-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND490-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND490-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND490-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Nancy Rosenberg
njrose@juno.com
1880 White Oak Dr Apt 116
Houston, TX 77009

IND490 Nancy Rosenberg, page 1 of 1

IND490-1 See response to comment IND17-1.

IND490-2 See response to comment IND17-1.

IND490-3 See response to comment IND17-2.

IND490-4 See response to comment IND17-3.

IND490-5 See response to comment IND17-4.

IND490-6 See response to comment IND17-5.

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

FILED
SECRETARY OF THE
COMMISSION

2019 FEB -4 P 3:52

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND491-1 IND491-2

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND491-3

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND491-4

These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. IND491-5

I have seen the aftermath of fracking operations and the horrendous destruction left behind with no entity held responsible for clean up. Fracking destroys the enviroment, natural lands homesteads, towns and communities. The beauty of Texas lies within the miles and miles of native lands untouched by man and industry. For these reasons and many others, I am opposed to all four of these projects. IND491-6

Sincerely,

Karen Ricks
karmar21@comcast.net
18715 Mirror Lake Dr
Spring, TX 77388

IND491 Karen Ricks, page 1 of 1

IND491-1 See response to comment IND17-1.

IND491-2 See response to comment IND17-1.

IND491-3 See response to comment IND17-2.

IND491-4 See response to comment IND17-3.

IND491-5 See response to comment IND17-4.

IND491-6 See response to comment IND17-5.

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

FILED
SECRETARY OF THE
COMMISSION

2019 FEB -4 P 3:52

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking has been shown to polute ground water, cause minor earthquakes, contaminate drinking water, and the pipelines present a serious danger of leaking and possible explosions. IND492-1
I am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND492-2 IND492-3
The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND492-4
Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND492-5
These projects would force Texas to become a sacrifice zone for fossil fuel exports to countries like Ireland who have banned fracking from their countries. France and Ireland understand the harmful impact of fracking, yet are willing to sacrifice my community and the rest of Texas for cheap fossil fuels. For these reasons and many others, I am opposed to all four of these projects. IND492-6

Sincerely,

Edward Lackey
elackey49@gmail.com
140 Windy Hills Rd
Dripping Springs, TX 78620

IND492 Edward Lackey, page 1 of 1

IND492-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND492-2 See response to comment IND17-1.

IND492-3 See response to comment IND17-2.

IND492-4 See response to comment IND17-3.

IND492-5 See response to comment IND17-4.

IND492-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We should not contaminate our land to provide fossil fuels to foreign countries. IND493-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND493-2 IND493-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND493-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND493-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND493-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Darvin Oliver
carter_o@yahoo.com
1101 Lcr 618
Mart, TX 76664

IND493 Darvin Oliver, page 1 of 1

IND493-1 Thank you for your comment.

IND493-2 See response to comment IND17-1.

IND493-3 See response to comment IND17-2.

IND493-4 See response to comment IND17-3.

IND493-5 See response to comment IND17-4.

IND493-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We used to live in Brownsville for 14 years. We love South Padre Island and Port Isabel. We want the beach and surrounding area to remain pristine and beautiful for all residents and tourists. IND494-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND494-2 IND494-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND494-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND494-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND494-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cynthia Meyer
ckm_44@att.net
6212 Monticello Dr-
Frisco, TX 75035

IND494 Cynthia Meyer, page 1 of 1

IND494-1 Thank you for your comment.

IND494-2 See response to comment IND17-1.

IND494-3 See response to comment IND17-2.

IND494-4 See response to comment IND17-3.

IND494-5 See response to comment IND17-4.

IND494-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We will run out of oil and gas one day. We need to focus on energy sources that we can depend on in the coming years and that will not harm the economy or environment. IND495-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND495-2 IND495-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND495-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND495-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND495-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Allison Vitek
amvitek440@gmail.com
7707 Sand Prairie Dr.
Houston, TX 77095

IND495 Allison Vitek, page 1 of 1

IND495-1 Thank you for your comment. As stated in section 3.1 of the EIS, wind, solar, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND495-2 See response to comment IND17-1.

IND495-3 See response to comment IND17-2.

IND495-4 See response to comment IND17-3.

IND495-5 See response to comment IND17-4.

IND495-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We're watching. IND496-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND496-2 IND496-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND496-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND496-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND496-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Debra McCawley
mcbriendl@gmail.com
1008 E Humbolt st
Fort Worth, TX 76104

IND496 Debra McCawley, page 1 of 1

IND496-1 Thank you for your comment.

IND496-2 See response to comment IND17-1.

IND496-3 See response to comment IND17-2.

IND496-4 See response to comment IND17-3.

IND496-5 See response to comment IND17-4.

IND496-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

what kind of planet are we leaving our children and grandchildren?!? This fracking in Port Isabel and South Padre is like every sci-fi horror movie come true IND497-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND497-2 IND497-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND497-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND497-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND497-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Frederick Chase
fchase@satx.rr.com
14006 Winding Hl
San Antonio, TX 78217

IND497 Frederick Chase, page 1 of 1

IND497-1 The proposed Annova LNG Project does not include fracking.

IND497-2 See response to comment IND17-1.

IND497-3 See response to comment IND17-2.

IND497-4 See response to comment IND17-3.

IND497-5 See response to comment IND17-4.

IND497-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

What will we have to do to stop this? We'll see.... IND498-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND498-2 IND498-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND498-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND498-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND498-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Stephen Stoker
otnac6@gmail.com
8401 N Nw Branfls Ave Apt 135
San Antonio, TX 78209

IND498 Stephen Stoker, page 1 of 1

IND498-1 Thank you for your comment.

IND498-2 See response to comment IND17-1.

IND498-3 See response to comment IND17-2.

IND498-4 See response to comment IND17-3.

IND498-5 See response to comment IND17-4.

IND498-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Whatever profit you are making now will NEVER return your planet to it's natural condition - INVEST IN GREEN ENERGY INSTEAD!!! Save our Planet (Mother Earth) IND499-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they IND499-2 would endanger communities across Texas, damage the local environment of South Texas, destroy IND499-3 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism.

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, IND499-4 which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected.

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would IND499-5 increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions.

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. IND499-6 Don't sacrifice my community and the rest of Texas for cheap fossil fuels.

For these reasons and many others, I am opposed to these projects.

Sincerely,

Theresa Martinez
spiffytrooper@gmail.com
PO Box 174
Pearsall, TX 78061

IND499 Theresa Martinez, page 1 of 1

IND499-1 Thank you for your comment. As stated in section 3.1 of the EIS, wind, solar, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives.

IND499-2 See response to comment IND17-1.

IND499-3 See response to comment IND17-2.

IND499-4 See response to comment IND17-3.

IND499-5 See response to comment IND17-4.

IND499-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

When are you going to recognize how dangerous these terminals and pipelines are? Are you going to build your house and plant your garden next to them? IND500-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND500-2 IND500-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND500-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND500-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND500-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Bettie Winsett
dywins@yahoo.com
904 Travis St
Red Oak, TX 75154

IND500 Bettie Winsett, page 1 of 1

IND500-1 Thank you for your comment.

IND500-2 See response to comment IND17-1.

IND500-3 See response to comment IND17-2.

IND500-4 See response to comment IND17-3.

IND500-5 See response to comment IND17-4.

IND500-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

When are you lawmakers going to wake up and Stop all these myriad things that are compounding the harm we are doing to our earth in the name of what I am not sure. It is apparent that humanity is not the first priority nor is the earth. Please stand up to make a change here. IND501-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND501-2 IND501-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND501-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND501-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND501-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Kathleen Younghans
kathieayounghans@gmail.com
1802 Anita Dr
Austin, TX 78704

IND501 Kathleen Younghans, page 1 of 1

IND501-1 Thank you for your comment.

IND501-2 See response to comment IND17-1.

IND501-3 See response to comment IND17-2.

IND501-4 See response to comment IND17-3.

IND501-5 See response to comment IND17-4.

IND501-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Where on this planet will the children of those who promote fracking will live? Fracking is responsible for increasing seismic events, will release carbon naturally trapped.... IND502-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND502-2 IND502-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND502-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND502-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND502-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Luis Perez
luis_perez25@yahoo.com
1442 Timber Valley Dr
Eagle Pass, TX 78852

IND502 Luis Perez, page 1 of 1

IND502-1 The proposed Annova LNG Project does not include fracking.

IND502-2 See response to comment IND17-1.

IND502-3 See response to comment IND17-2.

IND502-4 See response to comment IND17-3.

IND502-5 See response to comment IND17-4.

IND502-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Who knows what's already in the fracking chemicals? Make the companies disclose that so we understand fracking better, then we'll know how dangerous these LNG projects will really be. IND503-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND503-2 IND503-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND503-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND503-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND503-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Cynthia Prince
mslookitup@hotmail.com
20331 Stonebridge Terrace Ct
Richmond, TX 77407

IND503 Cynthia Prince, page 1 of 1

IND503-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND503-2 See response to comment IND17-1.

IND503-3 See response to comment IND17-2.

IND503-4 See response to comment IND17-3.

IND503-5 See response to comment IND17-4.

IND503-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why are we willing to make our country a wasteland in the name of profit? I remember visiting Russia, and seeing the pollution in the water next to the docks, and being so glad, that I lived in the U.S. where we had laws to preserve the environment. IND504-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND504-2 IND504-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND504-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND504-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND504-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Natasha Tuckett
nattuckett@yahoo.com
1092 Windmeadows Dr
College Sta, TX 77845

IND504 Natasha Tuckett, page 1 of 1

IND504-1 Thank you for your comment.

IND504-2 See response to comment IND17-1.

IND504-3 See response to comment IND17-2.

IND504-4 See response to comment IND17-3.

IND504-5 See response to comment IND17-4.

IND504-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why destroy a place where people live and vacation. IND505-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND505-2 IND505-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND505-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND505-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND505-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

BILLIEJEAN JONES
billiejeanjones7@gmail.com
3368 HWY 2921
DE LEON, TX 76444

IND505 Billiejean Jones, page 1 of 1

IND505-1 Thank you for your comment.

IND505-2 See response to comment IND17-1.

IND505-3 See response to comment IND17-2.

IND505-4 See response to comment IND17-3.

IND505-5 See response to comment IND17-4.

IND505-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why do these companies chose the Coast. This will impact all of us who love to go th the coast. Our Environment is being threatened by all of the Oil Business & affiliates. IND506-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND506-2 IND506-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND506-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND506-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND506-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Severa Krausse
gramasara@gmail.com
231 McMullen St
San Antonio, TX 78210

IND506 Severa Krausse, page 1 of 1

IND506-1 Thank you for your comment.

IND506-2 See response to comment IND17-1.

IND506-3 See response to comment IND17-2.

IND506-4 See response to comment IND17-3.

IND506-5 See response to comment IND17-4.

IND506-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why is it that we don't learn from the experiences around us? We have seen our lands and oceans totally compromised from spills and leaks. Whole communities have suffered from these events, and we're must stop now!! No more fracking!! IND507-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy IND507-2 Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND507-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND507-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND507-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND507-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Leonor Smith Zacarías
spumo@att.net
221 Crest Trail
San Antonio, TX 78232

IND507 Leonor Smith Zacarfas, page 1 of 1

IND507-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND507-2 See response to comment IND17-1.

IND507-3 See response to comment IND17-2.

IND507-4 See response to comment IND17-3.

IND507-5 See response to comment IND17-4.

IND507-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why should we harm our country just so a few can get richer by selling to other countries? Sure doesn't "make America great again." IND508-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND508-2 IND508-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND508-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND508-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND508-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

John Browning
johnbrowning1935@gmail.com
110 Riviera Dr
San Antonio, TX 78213

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:28
FEDERAL ENERGY
REGULATORY COMMISSION

IND508 John Browning, page 1 of 1

IND508-1 Thank you for your comment.

IND508-2 See response to comment IND17-1.

IND508-3 See response to comment IND17-2.

IND508-4 See response to comment IND17-3.

IND508-5 See response to comment IND17-4.

IND508-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Why? Why? Why? would a responsible person want to endanger our environment for a dying industry? IND509-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND509-2 IND509-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND509-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND509-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND509-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Pam Turlak
pturlak@gmail.com
3317 Big Bend Drive
Austin, TX 78731

IND509 Pam Turlak, page 1 of 1

IND509-1 Thank you for your comment.

IND509-2 See response to comment IND17-1.

IND509-3 See response to comment IND17-2.

IND509-4 See response to comment IND17-3.

IND509-5 See response to comment IND17-4.

IND509-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Wildlife and the welfare of humans will be affected!! IND510-1

I am opposed to the proposed Annova LNG, and the two other proposed LNG projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy Indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND510-2 IND510-3

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these LNG projects pose and demand the permits be rejected. IND510-4

Finally, the construction of the three LNG terminals Rio Grande LNG, Texas LNG, and Annova LNG would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND510-5

These projects would force Texas to become a sacrifice zone for fossil fuel exports to other countries. Don't sacrifice my community and the rest of Texas for cheap fossil fuels. IND510-6

For these reasons and many others, I am opposed to these projects.

Sincerely,

Monica Arsate
arsate36@gmail.com
5627 Rushhill St
San Antonio, TX 78228

IND510 Monica Arsate, page 1 of 1

IND510-1 Thank you for your comment.

IND510-2 See response to comment IND17-1.

IND510-3 See response to comment IND17-2.

IND510-4 See response to comment IND17-3.

IND510-5 See response to comment IND17-4.

IND510-6 See response to comment IND17-5.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is harmful, and toxic. | IND511-1

Sincerely,

Monica Montalvo
monica.montalvo.rph@gmail.com
24410 Brazos Stage
San Antonio, TX 78255

IND511 Monica Montalvo, page 1 of 1

IND511-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Fracking is very bad for the environment. Humans depend on a healthy environment for survival. I don?t think this needs more explanation. IND512-1

Sincerely,

Gena Sadler
genaenae@aol.com
912 W Agarita Ave
San Antonio, TX 78201

IND512 Gena Sadler, page 1 of 1

IND512-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I am a Texas resident fully opposed to the LNG projects in South Texas. | IND513-1

Sincerely,

Jeff Warner
jwarner948@gmail.com
8016 Blue Hole Ct
McKinney, TX 75070

IND513 Jeff Warmer, page 1 of 1

IND513-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

THIS IS LITERALLY EMITTING CANCER TO THE PEOPLE OF THIS COUNTRY, THERE'S A REASON PLANTS WILL NOT GROW AROUND THE FRACKING SITE. IT'S TERRIBLE FOR US AND IS ALREADY CAUSING IRREPARABLE DAMAGE IND514-1

Sincerely,

Alexandra Canei
alex.marie.canei@gmail.com
3323 N Haskell Ave
Dallas, TX 75204

IND514 Alexandra Canei, page 1 of 1

IND514-1 The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Invest in renewable energy projects, contracts, subsidies and development. the TCEQ should do everything it can to preserve current level of cleanliness, or work to reduce levels of air pollution substantially. Fracking burns off IMMENSE amounts of methane and other hydrocarbon gases. This adds more particulates, toxic chemicals and greenhouse gases to the atmosphere. The people of TEXAS do not benefit from these projects. Stop siding with moneyed corporations and special interests, the TCEQ must prevent this irresponsible project from moving forward and WORK for the PEOPLE who breath the air and drink the water in Texas. Thank you for your time

IND515-1

IND515-2

Sincerely,

Edward Grigassy
guitar@texas.net
6405 Sharpview Dr
Houston, TX 77074

IND515 Edward Grigassy, page 1 of 1

IND515-1 As stated in section 3.1 of the EIS, wind, solar, or other renewable energy project cannot meet the purpose for the Project and are not considered or evaluated as alternatives. The proposed Annova LNG Project does not include fracking. See also response to comment IND9-14.

IND515-2 The proposed Annova LNG Project does not include fracking.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The sites that are targeted along the beautiful coasts and lands of Texas are important areas of beauty and wildness. Fracking has no place near our oceans, beaches or close to those who live there. If you want oil, put it in your backyard. IND516-1

Sincerely,

J Iverson
jan@iverwes.com
5901 Cherry Creek Dr
Austin, TX 78745

IND516 J. Iverson, page 1 of 1

IND516-1 The proposed Annova LNG Project does not include fracking.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

We the people have to fight for these lands, because in the end they don?t care about the environment, only there pockets. And all this money they have, I doubt they?ll use it to bring back something that is destroyed. IND517-1

Sincerely,

Joshua Jacinto
joshuaj333@gmail.com
115 Sunset Loop
Eagle Pass, TX 78852

IND517 Joshua Jacinto, page 1 of 1

IND517-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

I drove for an oil services company. I got to see what most people don?t see. Cutting corners to boost profits. Little drilling companies do pretty much whatever they want to. IND518-1

Sincerely,

Robert Martin
robert1949tx@yahoo.com
2011 Carriage Club Dr
Cedar Park, TX 78613

IND518 Robert Martin, page 1 of 1

IND518-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

am opposed to all four of these proposed projects because they would endanger communities across Texas, damage the local environment of South Texas, destroy indigenous cultural sites, and harm local industries like shrimping, fishing and eco-tourism. IND519-1 IND519-2

The South Texan communities of South Padre Island, Port Isabel, Long Island Village, and Laguna Vista, which could be forced to live next to the three proposed LNG export terminals, have all passed anti-LNG resolutions. They understand the risks these projects pose and demand the permits be rejected. IND519-3

Finally, the construction of the three LNG terminals would increase fracking in the Eagle Ford shale and Permian Basin regions of Texas and fuel climate change. The terminals would also demand a massive pipeline network, and threaten families living along the pipeline route with leaks, spills, and pipeline explosions. IND519-4

Sincerely,

Patricia Brooks
pdb879@yahoo.com
7235 Sharpview Dr
Houston, TX 77074

IND519 Patricia Brooks, page 1 of 1

IND519-1 See response to comment IND17-1.

IND519-2 See response to comment IND17-2.

IND519-3 See response to comment IND17-3.

IND519-4 See response to comment IND17-4.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

The future of our children is at stake. We need to preserve our land and protect it. Fossil fuels are outdated and are no longer needed. IND521-1

Sincerely,

Noemi Silva
noemi.silva@aol.com
1178 FM 2187 Rd
Sealy, TX 77474

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:30
FEDERAL ENERGY
REGULATORY COMMISSION

IND521 Noemi Silva, page 1 of 1

IND521-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

if against nature: NO!!...i believe in progress but not over the suffering of other.. | IND523-1

Sincerely,

Aguedys Whittaker
aguedysw@hotmail.com
8415 Rose Garden Dr
Houston, TX 77083

IND523 Aguedys Whittaker, page 1 of 1

IND523-1 Thank you for your comment.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Please protect Earth for future generations.The amount of water used for mining,fracking and manufacturing cannot be or is not being recycled.Clean up your mess! IND524-1

Sincerely,

Waldo Castro
wcastro3@satx.rr.com
2614 Darwin Dr
San Antonio, TX 78228

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SECRETARY OF THE
COMMISSION
2019 FEB -4 P 3:30
FEDERAL ENERGY
REGULATORY COMMISSION

IND524 Waldo Castro, page 1 of 1

IND524-1 The proposed Annova LNG Project does not include fracking, mining, or manufacturing. See also response to comment IND9-14.

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

Subject: Comment on the proposed Port of Brownsville LNG export terminal Annova LNG (CP16-480-000).

Save the Planet!!!! | IND526-1

Sincerely,

Lori Namapee
62081@eaglepassisd.net
577 Bishop Gracida Dr
Eagle Pass, TX 78852

IND526 Lori Namapee, page 1 of 1

IND526-1 Thank you for your comment.