Ratepayers for Affordable Clean Energy

28 September 2007

Re: Docket Number USCG-2007-26844

United States Coast Guard
(by way of Department of Transportation's Docket Management Facility)
1200 New Jersey Ave SE,
West Building, Room W12-140
Washington, DC 20590-0001

To Whom it May Concern,

These comments regarding the Oceanway LNG facility are submitted on behalf of Ratepayers for Affordable Clean Energy (RACE). RACE is a West Coast-wide coalition of organizations and community groups working for clean energy and healthy, safe communities. We have 25 partner organizations, representing West Coast communities from Baja California to Oregon. A list of our partner organizations is at the end of this email.

The intent of this letter is to submit a list of questions regarding the possible impacts of the Oceanway LNG facility. We respectfully request that these factors are fully considered in the EIA/EIS process being undertaken by the United States Coast Guard, MARAD, and the City of Los Angeles. This list is not a complete list of every concern that individual RACE partners hold.

1. What is the need? In their decision to reject the EIR/EIS for the Cabrillo Port LNG project, State Lands Commissioner John Garamendi stated, "The EIR demonstrates a glaring lack of consideration given to the use of alternative energy sources, and it relies in part on what appear to be outdated statistics. Most disturbing, the proponents were unable to present a persuasive case as to the actual need for the Cabrillo Port proposal." Given that the Oceanway project is in close proximity to the proposed location for Cabrillo Port, what makes the demand for this project different than for Cabrillo? Commissioner Garamendi refers to "outdated statistics," which, we assume, is referring to California Energy Commission (CEC) statistics cited in that EIR. Given that is the case, is it appropriate for the Oceanway EIR/EIS to also cite other natural gas demand projections, other than those used by the Energy Commission?

2. How will the project comply with the state's and Los Angeles' efforts to reduce greenhouse gas emissions? Thus far, three studies have detailed the lifecycle greenhouse gas emissions of LNG. All of them conclude that there are substantial increases of greenhouse gases when natural gas is moved overseas by way of the LNG process.

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The consensus is that this can add up to 25 percent extra greenhouse gas emissions over the lifecycle emissions of North American natural gas, making it comparable in some cases to the lifecycle emissions of coal-fired electricity.[1] Mayor Villaraigosa recently announced his intention to reduce greenhouse gas emissions in Los Angeles by 35 percent. How will this project impacts that promise?

3. What are the Environmental Justice impacts of the project? Emissions from fossil fuels is already having a negative impact throughout Southern California. These impacts are especially felt among the region's poor communities. In addition, how will pipeline siting and routing endanger these communities with hazardous pipeline?

4. What impact will the project have on the state's Renewable Portfolio Standard? According to California's energy policy, the state's electricity should be coming from 1/3rd renewable sources by 2020. One LNG terminal has the potential to provide enough fuel to provide a significant amount of Southern California's electricity. Is there room for both this new investment in fossil fuels, and this aggressive renewable energy policy?

These questions are of critical interest not only to every person in the Southern California region, but to every Californian. Given the spirit of current and pending clean energy laws in California, it is imperative that all of these be adequately addressed in this EIR/EIS process.

Yours,

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RACE's partners include:

Amazon Watch, Border Power Plant Working Group, California Alternative Energies Corporation, Californians for Renewable Energy - CARE, Central Coast Alliance United for a Sustainable Economy (CAUSE), Center for Biological Diversity, Citizens Against LNG (Coos Bay), Coalition for a Safe Environment, Energy Options, Environment California, Environmental Protection Information Center (EPIC), Friends of Living Oregon Waters (FLOW), Green Guerrillas, Greenpeace, Local Power, Long Beach Citizens for Utility Reform, Marin Clean Alternative Energy Now, Northcoast Environmental Center, Pacific Environment, Rivervision, Saviers Road Design Team, Vallejo Community Planned Renewal (VCPR), Ventura LNG Task Force, Wildcoast, Women's Energy Matters

[1] See: Jaramillo, Paulina; Griffin, W. Michael; Matthews, H. Scott. *Comparative Life Cycle Air Emissions of Coal, Domestic Natural Gas, LNG, and SNG for Electricity Generation.* Carnegie Mellon University. 2007; Heede, Richard. *LNG Supply Chain Greenhouse Gas Emissions for the Cabrillo Deepwater Port: Natural Gas from Australia to California.* Climate Mitigation Services. May 7, 2006; and Powers, Bill. Presentation at Global LNG Summit, June 2004. Available at www.borderpowerplants.org