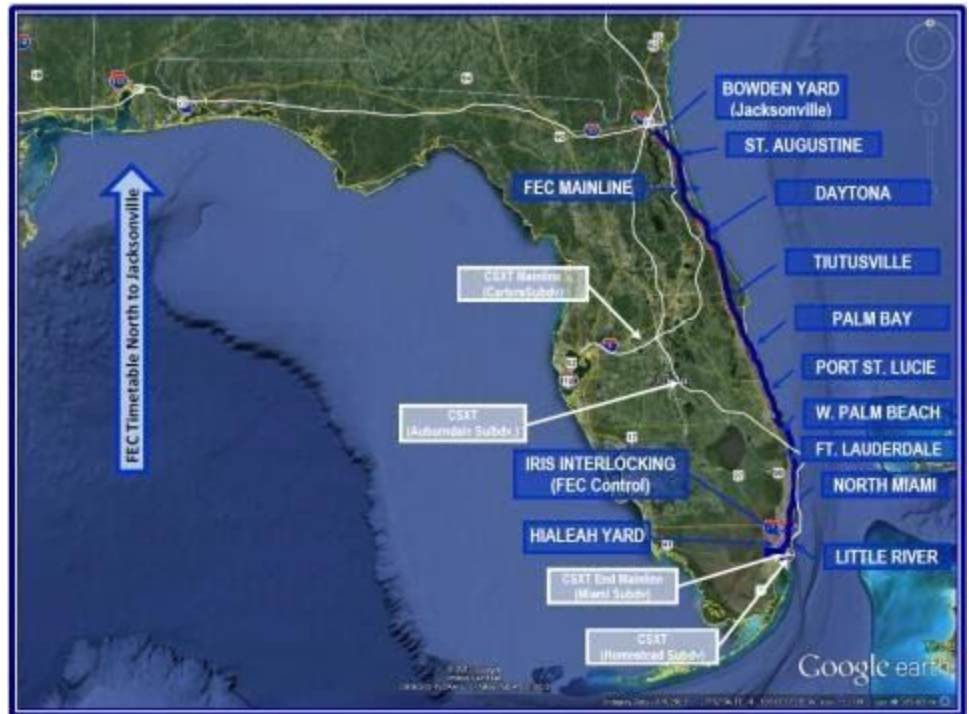


proposed in the docket is safe either for America's first responders or the public.”

5. Many rail lines that would carry LNG approved by this proposed rule run through densely populated areas, by schools, hospitals, and homes. See for example “FECR Movement of LNG ISO Containers by Rail, Quantitative Risk Analysis (QRA) Considering LNG Position in Train and Train Speed,” Exponent Project No. 1308194.001, prepared for Florida East Coast Railway, LLC, December 8, 2016, which details routes up and down Florida’s densely populated East coast, from the Hialeah LNG facility next to Miami Airport to Jacksonville, with Port Everglades in between. All such areas would be put to unnecessary risk by this LNG rail rule. For much more detail on LNG by rail in Florida, especially about exclusion zones, Potentially Affected Populations, and Potentially Sensitive Establishments, see the December 17, 2019, comment by Alliance for Sale Trains, Inc. The FECR QRA does examine some risks such as BLEVE that are lacking from the current rulemaking, yet the FECR QRA was inadequate for example in using inappropriate comparisons with propane. The FECR QRA is also for sturdier ISO tank containers. Thus the current rulemaking is even more inadequate.



6. PHMSA claims LNG by rail has no environmental impact. In addition to the environmental effects of the risks of the previous numbered items in this letter, more distribution of LNG means more fracking, with its severe and widespread health, environmental, social, and economic costs.
7. The real reason for PHMSA contemplating this rule is to promote fracking, which is no reason to risk public health and safety and the environment. The Pennsylvania Independent Oil and Gas Association (PIOGA) spells this out in a comment letter of January 10, 2020, “As the tremendous success in accessing Marcellus and Utica shale reserves has dramatically increased supply, PIOGA has broadened its emphasis to seeking expanded markets and additional uses for natural gas and related products. This has led to an expanded focus to more fully include pipeline operators and end-uses such as power generation and transportation (vehicles, locomotives and boats) as well as industrial and manufacturing consumers of