

exacerbate the problem, there are no Draft Environmental Impact Statements for inland LNG export facilities while the danger to densely populated neighborhoods from a fire or explosion at the facility still exists. The public must be involved in any approval process for an inland LNG export project, but without a lead federal agency, such as FERC, citizens are excluded from the process.

FERC is well versed in the dangers of LNG. The Commission understands that failure of an LNG facility can result in loss of life and significant environmental and economic consequences. See for example [Federal Energy Regulatory Commission - Strategic Plan FY 2014–2018 March 2014](#).¹² **“Failure of an LNG facility or a non-federal hydropower project can result in loss of life and significant environmental and economic consequences.”**

III. ENVIRONMENTAL REVIEWS DO NOT OCCUR

From Pivotal III.A.1: *“As the Commission explained in orders disclaiming jurisdiction over small-scale LNG facilities, the lack of Commission-led environmental review does not mean environmental review does not occur. Rather, transportation and storage of LNG “is subject to regulations and requirements of the U.S. Environmental Protection Agency under its various enabling statutes, including the Clean Water Act, Clean Air Act, and the Hazardous Materials Transportation Act.” In addition to these federal permitting requirements, small-scale LNG facilities are subject to state and local permitting requirements.”*

Response: EPA’s actual role in the LNG Project Approval and Environmental Review Process requires FERC involvement (slightly paraphrased) from EPA’s Figure 1:¹³

¹² [Federal Energy Regulatory Commission - Strategic Plan FY 2014–2018 March 2014](https://www.ferc.gov/sites/default/files/2020-06/FY-2014-FY-2018-strat-plan.pdf), FY 2014-2018, Accessed September 29, 2022, <https://www.ferc.gov/sites/default/files/2020-06/FY-2014-FY-2018-strat-plan.pdf>

¹³ Figure 1 on page iii, EPA’s Liquified Natural Gas Regulatory Roadmap, EPA, November 2006, #EPA-230-B-06-001, https://www.epa.gov/sites/default/files/2015-08/documents/lng_regulatory_roadmap.pdf