



October 22, 2025

Jeffrey Martin
President and CEO
Sempra
488 8th Ave.
San Diego, CA 92101

Re: Open Letter Opposing Vista Pacifico LNG Project

Dear Mr. Martin:

On behalf of the Natural Resources Defense Council (“NRDC”) and its 3 million members and activists, we write, first, to applaud Sempra’s unequivocal recognition of the importance of environmental protection, biodiversity, and reducing greenhouse gas emissions. In its 2024 Corporate Sustainability Report,¹ for example, Sempra expressed its own commitments this way:

At 46: Conscientious environmental management guides our efforts to protect natural resources, reduce emissions and uphold responsible stewardship across our operations. . . . Our environmental, water and biodiversity policies and codes of conduct provide a framework for employees and business partners to help protect the environment and continue good stewardship of shared natural resources while also working to avoid or reduce impacts to, and from, our operations.

At 48: Greenhouse gases and their impact on the planet are a global challenge. Addressing this issue and the actions necessary to reduce present and future GHG emissions and climate-related exposure risks will require a collective effort across the global community, including our businesses, business partners, consumers and regulatory and policy stakeholders.

At 57: Protecting and preserving biodiversity is an important consideration of our operations as we strive to reduce our environmental impact while supporting the resilience of local ecosystems and communities.

For their part, Sempra subsidiaries have endorsed these sentiments. On its website, for example, SoCalGas states that “[a]s the nation’s largest natural gas utility, we are well aware of our responsibility to implement sustainable practices and remain a sound environmental steward. And, we gladly embrace this role.”² Sempra Infrastructure, too, affirms that “we believe that the

¹ https://www.sempra.com/sites/default/files/CSR/SEMPRA_CSR_2024_FINAL.pdf

² <https://www.socalgas.com/our-community/protecting-preserving-the-environment>

protection and preservation of the environment can be compatible with the responsible development of energy infrastructure.”³

These words, prominently displayed on your websites (along with a list of awards and recognition),⁴ portray an appreciation for environment, sustainability, and governance (“ESG”) as essential to Sempra’s success. Only if supported by active, positive, and sustained corporate engagement can the nations of the world hope to achieve their aspirations for a stable climate and a cleaner, healthier renewable energy future.

With this in mind, we write today to convey our urgent concern about the disconnect between Sempra’s corporate commitments to ESG, on the one hand, and, on the other, its participation in plans for development of the Gulf of California (“Gulf”) for the production and transport of liquefied natural gas (“LNG”). Specifically, we refer to Sempra’s proposed Vista Pacifico LNG Project and related infrastructure (“Vista Pacifico”) proposed on, around, or connected to the Gulf at Topolobampo in northwestern Sinaloa, Mexico.⁵

For the reasons discussed below, we believe that Vista Pacifico is directly at odds with Sempra’s stated standards of environmental performance, sustainable resource management, and fiscal responsibility, because (1) it poses an unreasonable risk of irreparable harm to irreplaceable natural resources internationally recognized for their extraordinary importance (including death, injury, and significant disruption to endangered whales and other protected marine species and their habitat), and (2) it will inevitably expose Sempra and its investors to significant reputational and financial risk. We urge Sempra to reconsider its commitment to Vista Pacifico, and we respectfully request a meeting at your earliest convenience to discuss these urgent concerns.

I. Background on Vista Pacifico LNG

A. Project Description

As permitted by the U.S. Department of Energy (“DOE”) in 2021 (FTA countries)⁶ and 2022 (non-FTA countries),⁷ Vista Pacifico LNG is authorized to re-export 200 billion cubic feet per year of LNG from U.S.-sourced natural gas. The project is currently slated to comprise one 5-million ton per year (“MTPA”) floating liquefaction unit, one 180,000-cubic-meter tank, an LNG jetty and other related facilities, including the Northern Corridor Gas Pipeline required to

³ <https://semprainfrastructure.com/sustainability/environment/>

⁴ <https://www.sempra.com/recognition-awards>

⁵ In this context, “Sempra” also includes “Sempra Energy,” “Sempra LNG, LLC,” “Sempra Infraestructura,” “Sempra Infrastructure Partners,” or any other Sempra subsidiaries relevant to the Vista Pacifico LNG project.

⁶ U.S. Department of Energy, “Order Granting Long-Term Authorization to Export Natural Gas to Mexico and to Other Free Trade Agreement Nations,” April 9, 2021, available at:

<https://www.energy.gov/sites/default/files/2021-04/ord4688.pdf>

⁷ <https://www.sempra.com/newsroom/press-releases/sempra-infrastructure-receives-export-licenses-two-lng-projects>

connect the existing network with the planned terminal.⁸ Additional LNG liquefaction trains have also been considered,⁹ but the most recent estimate of projected capacity is 2-3 MTPA.¹⁰ The project's intended purpose is to supply LNG to geographically strategic Indo-Pacific markets.¹¹ In 2022 TotalEnergies signed an agreement with Semptra to off-take one-third of future production from Vista Pacifico.¹²

With at least two other major liquefaction export projects proposed on the Gulf's eastern shore -- (1) Saguaro Energia LNG proposed at Puerto Libertad, Sonora¹³ and AMIGO LNG proposed at Guaymas, Sonora¹⁴ -- Vista Pacifico is part of an unprecedented plan to industrialize the Gulf for the production and transport of LNG destined for Asia, comprising not only these terminals but their associated infrastructure, including deep water ports and hundreds of miles of new fossil fuel pipelines. Much of this infrastructure is proposed to be constructed in regions renowned for security risks associated with cartels and organized crime -- risks plainly relevant to the viability, social and environmental impacts, and economic sustainability of each of the projects.¹⁵

A. Public Opposition

Because this proposed industrialization by the fossil fuel industry poses a wide range of adverse impacts in the Gulf region, it has become the focus of intense and growing opposition both in Mexico and internationally. On July 25, 2025, for example, under the heading "URGENT ALERT: Liquefied Natural Gas Infrastructure Threatens the Outstanding Universal Value of the 'Islands and Protected Areas of the Gulf of California' World Heritage Site and Ramsar Wetlands,"¹⁶ NRDC joined with an international coalition of organizations¹⁷ in a letter to the Director of UNESCO's World Heritage Centre, General Secretary of the Ramsar Convention on Wetlands, and Director of the IUCN World Heritage Programme. In the letter, the coalition detailed a wide range of environmental, social, and economic concerns about planned LNG development in the Gulf, including Vista Pacifico.

⁸ Vista Pacifico LNG. *EIS-R*, p.I-1. <https://shorturl.at/JIVXm>;
http://104.209.210.233/gobmx/repositorio/DIAGNOSTICO_DE_ACCESIBILIDAD/MIA/25SI2024G0039/Resumen_Ejecutivo.pdf

⁹ <https://web.archive.org/web/20220625102048/http://www.texreport.co.jp/xenglish/eng-genryou/202011/202011261048Thu-5.html>

¹⁰ <https://investor.semptra.com/static-files/d4d3be75-4774-471f-8538-b21196541079>

¹¹ <https://www.semptra.com/newsroom/press-releases/semptra-infrastructure-receives-export-licenses-two-lng-projects>

¹² https://www.gem.wiki/Vista_Pacifico_LNG_Terminal

¹³ <https://mexicopacific.com/saguaro-energia/>

¹⁴ <https://www.lngalliance.com/projects-7>

¹⁵ [https://ieefa.org/resources/mexico-pacific-limited-delays-turmoil-and-permitting-errors-have-stymied-mexicos-largest#:~:text=Security%20risks,to%20reputational%20and%20political%20risks.](https://ieefa.org/resources/mexico-pacific-limited-delays-turmoil-and-permitting-errors-have-stymied-mexicos-largest#:~:text=Security%20risks,to%20reputational%20and%20political%20risks.gulf_lng.Urgent_Alert_UNESCO-IUCN-RAMSAR.july_15_2025.pdf)

¹⁶ [gulf_lng.Urgent_Alert_UNESCO-IUCN-RAMSAR.july_15_2025.pdf](https://ieefa.org/resources/mexico-pacific-limited-delays-turmoil-and-permitting-errors-have-stymied-mexicos-largest#:~:text=Security%20risks,to%20reputational%20and%20political%20risks.gulf_lng.Urgent_Alert_UNESCO-IUCN-RAMSAR.july_15_2025.pdf)

¹⁷ The signatories to the letter include the Center for Biological Diversity, Defensa Ambiental del Noroeste ("DAN"), Earthjustice, Public Citizen, Sierra Club, NRDC, Property Rights and Pipeline Center, Gulf South Fossil Finance Hub, and Texas Campaign for the Environment.

On October 9, 2025, the quadrennial World Conservation Congress of the International Union for the Conservation of Nature (“IUCN”)—the world’s largest environmental network, comprising over 1,400 member organizations from 170 countries—overwhelmingly approved Resolution 31,¹⁸ *“Protecting the Gulf of California World Heritage Sites of Mexico from Industrialization for LNG Development.”*¹⁹ The resolution expresses global concern over the proposed Saguaro, AMIGO, and Vista Pacífico LNG projects, recognizing the Gulf’s exceptional biodiversity and the risks posed to it and to local communities by development for LNG. The resolution calls on the Governments of Mexico and the United States to “oppose and, where necessary, reconsider actions permitting LNG industrialization of the Gulf” and to “prohibit such activities” in order to protect the region’s unique species diversity and sensitive ecosystem.²⁰

As a threshold matter, this unprecedented industrialization would occur in the heart of one of the most renowned areas of iconic biodiversity anywhere on Earth -- a region recognized formally not once but repeatedly for its conservation value, including by UNESCO as a World Heritage Site – and its impacts would be existential. Beyond the diverse risks associated with the introduction of major industry into this exceptional natural ecosystem, the consequences of using the uniquely biodiverse Gulf as a shipping channel for LNG vessels – in effect, as a gas station for transport of U.S. gas to Asia -- cannot, in our view, be meaningfully mitigated. Given the unavoidable impacts of the proposed projects individually and cumulatively, the location is manifestly unacceptable.

LNG transport through the narrow confines of the Gulf would put at risk multiple species of great whales (including the world’s largest, the endangered blue whale, as well as fin, sperm, humpback, gray, Brydes, orca, and gray whales) and other marine animals found in the region. During the decades-long life-span of each of the proposed projects, transit of massive LNG vessels through the Gulf, each hundreds of meters in length, would inevitably result in ship strikes,²¹ water pollution, habitat destruction and degradation, and a significant elevation of ambient ocean noise levels in key habitat of marine mammals whose survival (e.g., communication, feeding, finding mates, reproducing, etc.) depends on hearing and being heard.²² Inevitably, endangered whales and other marine life of concern would die as a direct result of the LNG development.

Beyond these threats to biodiversity in the Gulf, Vista Pacifico and the other planned LNG projects would result in significant contributions of greenhouse gas emissions, further aggravating the escalating global climate crisis,²³ at a time when, according to the International

¹⁸ <https://iucncongress2025.org/assembly/motions/motion/031>; https://iucn-2025.s3.eu-west-3.amazonaws.com/documents/en/CGR-2025-1.6-1_Annex_1_Motions_recorded_en_bloc.pdf

¹⁹ https://iucn-2025.s3.eu-west-3.amazonaws.com/documents/en/CGR-2025-1.6-1_Record_of_motions_approved_by_electronic_vote.pdf

²⁰ <https://www.nrdc.org/press-releases/iucn-members-pass-resolution-opposing-saguaro-mexico-pacific-lng-and-other-lng-gulf>

²¹ <https://www.science.org/doi/10.1126/science.adp1950>

²² <https://www.nrdc.org/sonicsea>

²³ https://www.theguardian.com/environment/2024/dec/05/climate-bomb-warning-over-200bn-wave-of-new-gas-projects?CMP=Share_iOSApp_Other

Energy Agency's World Energy Outlook in 2023, global LNG markets are headed toward a "glut of LNG."²⁴ The adverse health and economic consequences associated with LNG development in communities in and around the region have already raised significant concerns²⁵ among a growing coalition of over 30 groups in Mexico,²⁶ and they are the focus of active litigation.²⁷ If this unprecedented industrial development is allowed to proceed, the region is predictably at risk for development of other LNG projects in current or future planning in or around the Gulf.²⁸

We are concerned that the certain consequence of all of this would be transformation of the Gulf from a region of exceptional conservation importance into a sacrifice zone for fossil fuel production and transport over decades to come. For Sempra and its investors, the reputational risk is real, significant, and unavoidable, because, as the prospects of fossil fuel development of the Gulf become more widely known, opposition will grow and, ultimately, condemnation will attach to any company associated with it. This condemnation will justifiably extend to Sempra and its investors as a result of the Vista Pacifico project.

For these reasons and those discussed in detail below, we urge Sempra to (1) reconsider its involvement in this project and the uniquely destructive LNG scheme of which it is a part and, instead (2) seize this critical opportunity for leadership in recognizing the critical importance of protecting this extraordinary marine sanctuary.

II. Discussion of Major Concerns

In the July 15, 2025 coalition alert cited above,²⁹ a wide range of potential impacts from the proposed LNG development are identified, including on the climate and atmosphere, water and marine ecosystems, marine mammals, sea turtles, and associated species, critical wetlands and migratory birds, regional fisheries, and the Gulf communities that, through generations, have depended on them for their economic livelihood. In support of that discussion, please consider the following:

A. Biodiversity

The Vista Pacifico project would be a magnet for industrialization in an area formally recognized not once but repeatedly for its conservation value. Portions of the Gulf of California have been designated a World Heritage Site by UNESCO in 2005,³⁰ a Biosphere Reserve designated by Mexico in 1993,³¹ a Migratory Bird Refuge designated by Mexico in 1978,³² and, on numerous

²⁴ <https://www.iea.org/reports/world-energy-outlook-2023/executive-summary>

²⁵ <https://pestakeholder.org/news/pe-backed-lng-project-marred-with-setbacks-and-community-opposition/>

²⁶ <https://ballenasogas.org/>

²⁷ [The environmentalist president and a project that is not- Grupo Milenio](#)

²⁸ <https://news.oilandgaswatch.org/post/the-u-s-lng-export-boom-is-spreading-to-mexico-and-its-environmentally-sensitive-gulf-of-california>

²⁹ [gulf lng.Urgent Alert UNESCO-IUCN-RAMSAR.july 15 2025.pdf](#)

³⁰ <https://whc.unesco.org/en/list/1182>

³¹ https://en.wikipedia.org/wiki/Alto_Golfo_de_California_Biosphere_Reserve

³² <http://world-heritage-datasheets.unep-wcmc.org/datasheet/output/site/islands-protected-areas-of-the-gulf-of-california/>

occasions, as Ramsar Convention Wetlands of International Importance.³³ According to the project's 2024 environmental assessment, Vista Pacifico would be located within Ramsar Site No. 2025 "Santa Maria – Topolobampo – Ohuira."³⁴

This consensus of recognition is based on the rare diversity of species found in the Gulf – among them, endangered and other species of great whales, whale sharks, marine birds, and sea turtles, including the 2,000-pound leatherback -- many of which may be adversely impacted by LNG development, its related infrastructure, and its operations. Because of the Gulf's unique global importance, ocean explorer Captain Jacques Cousteau named the Gulf of California the "Aquarium of the World," and Mexican diplomat, poet, and environmental champion Homero Aridjis called it the "Serengeti of the Sea." It has been recognized by UNESCO as a "natural laboratory for the investigation of speciation," with "extraordinary importance for study."

According to UNESCO's summary of key World Heritage natural elements:

The site [of the Islands and Protected Areas of the Gulf of California] comprises 244 islands, islets and coastal areas that are located in the Gulf of California in north-[western] Mexico. The Sea of Cortez and its islands have been called a natural laboratory for the investigation of speciation. Moreover, almost all major oceanographic processes occurring in the planet's oceans are present in the property, giving it extraordinary importance for study. The site is one of striking natural beauty in a dramatic setting formed by rugged islands with high cliffs and sandy beaches, which contrast with the brilliant reflection from the desert and the surrounding turquoise waters. It is home to 695 vascular plant species, more than in any marine and insular property on the World Heritage List. Equally exceptional is the number of fish species: 891, 90 of them endemic. The site, moreover, contains 39% of the world's total number of species of marine mammals and a third of the world's marine cetacean species.³⁵

In a January 2025 study focusing on the proposed Saguaro project,³⁶ marine mammal scientists from the Marine Mammal Research Program ("PRIMMA") of the Autonomous University of Baja California Sur analyzed the potential risks to marine mammals in the Gulf of California (GOC). They confirmed the diversity of species described above, and they noted that the Gulf area includes "13 marine protected areas and 17 Ramsar Wetlands of International Importance and has been part of the UNESCO World Heritage List since 2005." After describing in detail the major cetacean species of concern and the potential footprint of the Saguaro project, the researchers summarized in their Conclusion³⁷ the most significant risks to those species and to the rich biodiversity of the Gulf:

³³ <https://www.ramsar.org/sites/default/files/documents/library/sitelist.pdf>

³⁴ Vista Pacifico EIS-R, pp. 107, 240, 259 and 742. <https://shorturl.at/JIVXm>

³⁵ <https://whc.unesco.org/en/list/1182/>

³⁶ "Impacto del Proyecto Saguaro Energia GNL a los cetaceos del Golfo de California," Urban et al. (January 2025) <https://drive.google.com/drive/folders/1z7rAw2PCQ4Jm4nOA9RGD4unwin0kdalF?usp=sharing> ("Marine Mammal Study").

³⁷ Marine Mammal Study, at p.33. See also <https://www.excelsior.com.mx/nacional/proyecto-saguaro-muerte-ballenas-golfo-de-california/1696802>

- The transit of LNG vessels through the GOC threatens to become the leading cause of death for large whales due to collisions.³⁸
- The GOC would cease to be a suitable area for reproduction and feeding of migratory species that depend on the GOC.
- The noise generated during construction of the gas plant in Puerto Libertad and during the docking of ships will cause acoustic disturbance and possibly acoustic injuries to the cetaceans that are distributed in the area.
- The transit of LNG vessels through the GOC will cause acoustic and behavioral disturbance to the 30 species of cetaceans that are distributed in the area.
- The [Saguaro] project would cause a decline in resident populations of large whales in the GOC.
- The resident population of fin whales, considered an indicator of the health of the GOC, will be the most affected by the development of this project.

The researchers further concluded that “the direct and indirect impacts of the project on the GOC ecosystem, and particularly on whale populations, would negatively impact the regional economy,” including “the economy of the Gulf’s coastal communities.”³⁹

With a focus on the three proposed major export projects, a July 28, 2025 scientific study assessed the impacts of vessel traffic proposed in the Gulf. Prepared by a team of scientists from Energy & Environmental Research Associates (“EERA”) and the Universidad Autonoma de Baja California Sur -- and entitled “Emissions and Underwater Noise from LNG Carrier Vessels” -- this study estimated the number of anticipated LNG vessel trips at full buildout at 900 each year – on average 2.5 tanker arrivals or departures per day.⁴⁰ As a direct result of the scale of large vessel traffic solely within the Gulf itself – with large vessels typically emitting sound levels 25 million to 250 million times more intense than a quiet ocean background level -- the report estimates an exponential increase in sound intensity along the principal vessel route, with an increase in air pollution estimated to equal yearly emissions of 130,000 passenger vehicles or more than 60 million gallons of gasoline consumed.⁴¹

Based on these findings, the research team concludes as follows:

- (1) The development of LNG export terminals in the GoC would substantially increase industrial shipping activity;
- (2) This increased tanker traffic could introduce environmental pressures to a region that currently experiences low marine traffic and supports a biologically rich and acoustically sensitive ecosystem, [raising] particular concern for resident and migratory whale species that rely on sound for communication, navigation, and survival; and

³⁸ *Id.* at pp.3, 33. See also <https://www.msn.com/es-mx/noticias/mexico/proyecto-saguaro-ser%C3%ADa-principal-cause-de-muerte-en-ballenas-del-golfo-de-california/ar-AA1y1UX2?ocid=BingNewsSerp#>

³⁹ Marine Mammal Study, at pp.3, 33.

⁴⁰ <https://static1.squarespace.com/static/65b27d4560a9af5ef9933359/t/6887bebf1adc1c67f7c36cd9/1753726655977/Equal+Routes+-+Mexico+LNG.pdf>, at pp.29, 43 (“Vessel Study”). See also <https://www.equalroutes.ca/news-resources/report-gulfofcalifornia> (“Summary Report”).

⁴¹ *Id.* at pp.34, 44; see also Summary Report, at pp.10, 13.

(3) Given the significance of GoC habitats, particularly for vulnerable marine mammals, a precautionary approach is recommended for any new industrial activity.⁴²

Collectively, this history of policy recognition and consensus of scientific opinion is a clear red flag regarding the significant risks posed by the proposed LNG development in the heart of this internationally renowned and protected natural ecosystem.⁴³ In the face of it, we do not believe that Sempra can credibly argue that its commitments to “conscientious environmental management” and “protecting and preserving biodiversity” are reconcilable with its promotion of Vista Pacifico or with any other LNG development in the Gulf. Given the risks to biodiversity alone, we believe these projects are indefensible, and we urge re-consideration of Sempra’s participation.

B. Climate

As you know, the overwhelming consensus of scientific opinion is that climate change is here, it is getting worse, fossil fuels are at the heart of it, and a rapid transition to renewable energy is necessary. Given the contributions of methane that will be produced and released for decades in connection with each of the proposed LNG projects, none is consistent either with the phase-out of fossil fuels determined by the international community to be essential to that transition⁴⁴ or with Sempra’s own net zero commitment to support it.

While Sempra may be anticipating that LNG would replace coal for baseload power generation in Asia, there is little evidence to suggest that the largest coal-consuming countries – that is, China and India -- are using imported LNG as a substitute, due both to economic cost and policy incentives.⁴⁵ In fact, as renewable energy expands in both markets, power generation from gas and LNG has remained meager over the past decade.⁴⁶ In Southeast Asia, “cost pressures, debt constraints, and clean energy development are prompting delays or cancellations of LNG-to-power projects.”⁴⁷

Notably, in a December 2023 letter to then-President Biden focusing on the specific risks of LNG,⁴⁸ 170 international scientists endorsed the urgency (“we are rapidly passing tipping points

⁴² Vessel Study, at pp.43-44; see also Summary Report, <https://www.equalroutes.ca/news-resources/report-gulfofcalifornia>, at p.15:

The proposed LNG terminals – and the resulting increase in LNG tanker traffic – pose serious threats to the GOC’s unique biodiversity and conservation areas, including those designated as a UNESCO World Heritage Site and Important Marine Mammal Areas. These developments increase the risks of air, water, and underwater noise pollution. Given the GOC’s critical ecological role – particularly as a habitat for resident and migratory marine megafauna -- a precautionary approach to industrial development is essential.

⁴³ https://www.milenio.com/internacional/exploradores-national-geographic-rechazan-proyecto-gas-golfo#google_vignette

⁴⁴ https://www.theguardian.com/environment/2024/dec/05/climate-bomb-warning-over-200bn-wave-of-new-gas-projects?CMP=Share_iOS

⁴⁵ <https://ieefa.org/resources/fact-sheet-lng-not-bridge-fuel-chinas-transition-coal-renewables>

⁴⁶ <https://ieefa.org/resources/lng-not-displacing-coal-chinas-power-mix>

⁴⁷ <https://www.nrdc.org/resources/high-risk-high-impact>, at p.5

⁴⁸ <https://www.foodandwaterwatch.org/2023/12/19/170-scientists-to-biden-reject-cp2-lng-terminal-and-all-new-fracked-gas-infrastructure/>

that are further escalating the climate crisis”) and unequivocally rejected the view that LNG development can be reconciled with your ESG commitments⁴⁹ “to reduce present and future GHG emissions” and “protect natural resources, reduce emissions and uphold responsible stewardship across operations”:

Altogether, the science to date shows that rapidly spiraling emissions of the climate super-pollutant methane are a major contributor to the ongoing failure to meet agreed-upon global emission targets and stabilize the climate. The science also shows that LNG facilities are inherently leaky operations and prodigious emitters of methane.⁵⁰

In a September 2024 letter to President Biden and Energy Secretary Granholm,⁵¹ leading members of Congress and parliamentarians from around the globe affirmed this conclusion and asserted that “[f]ar from being a clean ‘bridge’ fuel, LNG causes significant environmental harm.” They explained:

In addition to the carbon dioxide released when LNG is burned, the potent greenhouse gas effects of pervasive methane leaks throughout the LNG supply chain—which extends from initial exploration all the way through gas production, pipeline transportation, liquefaction, vessel transportation, regasification, distribution, and end-use consumption--likely eliminate any climate advantage of reduced carbon dioxide emissions.

In October 2024 (SCI Journal On-Line, Oct 3, 2024),⁵² Cornell University climate scientist Dr. Robert Howarth described the peer-reviewed analysis underlying his conclusion that “upstream and midstream methane emissions are the largest contributor to the LNG footprint”:

Overall, the greenhouse gas footprint for LNG as a fuel source is 33% greater than that for coal when analyzed using [Global Warming Potential over 20 years]. Even considered on the time frame of 100 years after emission, which severely understates the climatic damage of methane, the LNG footprint equals or exceeds that of coal.

Sempra has itself recognized that methane’s climate impact is significant, with a global warming potential (“GWP”) approximately 21 times greater than carbon dioxide.⁵³ As a result, a reduction in methane emissions today will have an outsized short-term impact compared to reductions in carbon dioxide emissions. According to a report by JP Morgan Chase, gas pipelines and LNG facilities contribute to over 10,000 kilotons of global methane emissions.⁵⁴ Although Sempra has committed to achieving net-zero by 2050,⁵⁵ development of Vista Pacifico is certain only to make achievement of that goal more difficult.

⁴⁹ https://www.sempra.com/sites/default/files/CSR/SEMPRA_CSR_2024_FINAL.pdf

⁵⁰ <https://www.foodandwaterwatch.org/wp-content/uploads/2023/12/Scientists-CP2-Letter-Final.pdf>

⁵¹ https://www.markey.senate.gov/imo/media/doc/international_lng_letter.pdf

⁵² <https://scijournals.onlinelibrary.wiley.com/doi/10.1002/ese3.1934>

⁵³ https://www.sempra.com/sites/default/files/resource-library/report-supplements/sempra_position-statement_natural-gas.pdf, at p.4.

⁵⁴ JPMorgan Chase, *The Methane Emissions Opportunity*, November 2023, at p.6

⁵⁵ https://www.sempra.com/sites/default/files/content/files/node-report/2020/sempra_2020_csr_snapshot_Environment.pdf

In light of current science, we believe that the multi-decade investment in fossil fuel infrastructure required by the Vista Pacifico project, on the production side, and potential consumers in Asia, on the consumer side, is irreconcilable with the urgency of our climate crisis and the achievement of international goals for greenhouse gas emission reductions that are essential to address it.⁵⁶ Neither NRDC nor its members are prepared to allow industrialization of the Gulf of California for LNG development to become the next chapter in the accelerating global tragedy of climate change. LNG in the Gulf – including Vista Pacifico -- is not needed within a net-zero energy scenario and will only add to the glut of LNG oversupply in the coming years.

C. Protected Areas, Energy Security, and the Economy

The planned transformation of the Gulf would make a mockery of Mexico's protected area designations for the region and, more broadly, of its history of support for whale and marine conservation, both domestically and internationally. A generation ago, for example, Mexican President Ernesto Zedillo made headlines globally when he abandoned a joint venture with Mitsubishi Corporation to build the world's largest industrial salt production facility around the last undisturbed breeding lagoon of the Pacific gray whale, in the World Heritage Site at El Vizcaino Biosphere Reserve on the Pacific coast of Baja California.⁵⁷ A dozen years ago, President Felipe Calderon cancelled permits for the proposed Cabo Cortez mega-resort project adjacent to Cabo Pulmo National Park along the southwestern coast of the Gulf, citing unacceptable risk to its sensitive coral reef and the biodiversity of its surrounding marine ecosystem.⁵⁸

In addition to these threats to the ecology of the region and the stability of our climate, LNG development of the Gulf⁵⁹ poses significant economic risks both for potential regional impacts on tourism and the rich fishing industry⁶⁰ and, more broadly, for Mexico's economy.⁶¹ Rather than investing in sustainable renewable energy alternatives (and the job creation, energy security, and other economic and social opportunities that they enable), the development of multi-billion-dollar LNG export infrastructure risks locking Mexico into a decades-long bet on volatile LNG markets. Through 2030, the world is on pace to add an unprecedented volume of new LNG export capacity,⁶² while demand in Europe and the vast majority of Asia falls.⁶³ Demand growth

⁵⁶ See generally *Is LNG Worse Than Coal? The economic, climate and safety risks of LNG as part of the energy transition*, World Economic Forum, Davos, Switzerland (January 20, 2025); <https://ieefa.org/articles/world-economic-forum-sessions-highlight-lngs-economic-energy-security-and-climate-risks>

⁵⁷ <https://www.sfgate.com/green/article/saltworks-vetoed-to-protect-whales-mexico-2798791.php>

⁵⁸ <https://www.latimes.com/archives/blogs/world-now/story/2012-06-15/mexico-cancels-mega-resort-project-near-baja-california-reef>

⁵⁹ <https://ieefa.org/resources/global-lng-outlook-2024-2028>

⁶⁰ <https://www.science.org/doi/10.1126/science.ads5826>

⁶¹ <https://ieefa.org/resources/risks-mount-world-energy-outlook-confirms-lng-supply-glut-looms>

⁶² <https://ieefa.org/resources/global-lng-outlook-2024-2028>

⁶³ <https://ieefa.org/resources/why-are-us-lng-companies-so-interested-mexico>

in Asian markets looks increasingly tenuous, as LNG is the highest marginal cost electricity in the region and faces steep price competition from less costly renewable energy alternatives.⁶⁴

In its 2024 World Energy Outlook, the IEA concluded that “[e]xisting LNG export capacity and new capacity under construction is sufficient to meet projected demand in the STEPS [Stated Policies Scenario] until 2040. This suggests that no further projects are required in the near term to satisfy demand for LNG.”⁶⁵ Considering that oversupply could result in lower prices and slimmer profits for LNG suppliers, this is not only a bad economic bet for your company,⁶⁶ but its timeframe is at odds with Mexico’s commitments to (1) energy security⁶⁷ and (2) an effective energy transition to lower carbon emissions in response to climate change, including compliance with greenhouse gas reduction commitments under the Paris Climate Accord.⁶⁸

In light of all of this, we believe that there may never be a clearer prescription for destruction of a natural World Heritage Site than the plan that Sempra and others are pursuing for industrialization of the Gulf of California -- not just of its individual species but of an entire natural ecosystem recognized globally for its exceptional conservation value. The fate of the Gulf of California watershed may be one of the most consequential land use decisions anywhere in the world today – a profound and consequential crossroad for the planet -- pitting the world’s greatest biodiversity against a decades-long expansion of fossil fuel development. Objectively, development of such a project in such a place is fraught with social, environmental, economic, and legal/regulatory risk – for the planet, for Mexico, and for Sempra and its investors.

With the Gulf of California in the bullseye of the fossil fuel industry, this is not a time for complacency about the ultimate outcome of the industry’s plans to put this unique natural sanctuary at risk. As public awareness grows, opposition to LNG in the Gulf, both in Mexico and internationally, is on the rise, and neither NRDC nor its coalition partners will rest until the protection that this World Heritage Site requires is secured for future generations. The Gulf and its iconic biodiversity must not be sacrificed in service of fossil fuel-based strategies that, rather than responding to the climate crisis, will ultimately exacerbate and prolong it.

Mr. Martin, this should not be understood as a request for Sempra to breach any existing or contractual obligations. But we instead invite you, going forward, to recognize the need for a different course in the Gulf of California. As CEO of Sempra, consistent with your ESG

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⁶⁴ <https://www.markey.senate.gov/news/press-releases/senator-markey-hosts-senate-climate-change-task-force-and-house-sustainable-energy-and-environment-coalition-meeting-on-lng-exports>

⁶⁵ International Energy Agency, *World Energy Outlook 2024*, at 179

⁶⁶ <https://ieefa.org/resources/japans-largest-lng-buyers-have-surplus-problem>

⁶⁷ <https://www.naturalgasintel.com/news/mexico-lng-buildout-poses-risks-for-internal-natural-gas-market-says-energy-policy-expert/>; <https://www.energypolicy.columbia.edu/publications/lucrative-reward-or-mounting-risk-mexicos-growing-reliance-on-us-gas/>

⁶⁸ <https://climatepromise.undp.org/what-we-do/where-we-work/mexico>

commitments and market competitiveness, you have the power to set that course – and we urge you to do so. We would welcome the opportunity to meet with you at your convenience, and we encourage you or your staff to reach out to Joel Reynolds at (323) 229-1444.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joel Reynolds". The signature is fluid and cursive, with the first name "Joel" being more prominent and the last name "Reynolds" written in a more compact, cursive style.

Joel Reynolds
Senior Attorney
Nature

A handwritten signature in dark ink, appearing to read "Brendan Guy". The signature is written in a cursive, flowing style, with the first name "Brendan" being larger and more prominent than the last name "Guy".

Brendan Guy
Senior Director, International Climate

cc: Justin Bird, CEO, Sempra Infrastructure
Andres Conesa, Board of Directors, Sempra
Maryam Brown, CEO, SoCal Gas
Abraham Zamora Torres, CSO, Sempra Infrastructure
Manish Bapna, CEO, NRDC
Christy Goldfuss, Executive Director, NRDC
Kathleen Welch, Chair, Board of Trustees, NRDC
Tom Soto, Board of Trustees, NRDC
Jean-Michel Cousteau, Founder, Ocean Futures
Gustavo Alanis, Executive Director, CEMDA
Fernando Ochoa, Director General, DAN