



CENTER ON RACE, POVERTY & THE ENVIRONMENT

1999 HARRISON STREET, SUITE 650, OAKLAND, CA 94612 TEL 415-346-4179 FAX 415-346-8723
1012 JEFFERSON STREET, DELANO, CA 93215 TEL 661-720-9140 FAX 661-720-9483
WWW.CRPE-EJ.ORG

June 19, 2018

California Air Resource Board
1001 I Street
Sacramento, CA 95814

VIA EMAIL

cotb@arb.ca.gov
communityAir@arb.ca.gov

RE: Public Workshops for the Community Air Protection Program (Program) and Study of Neighborhood Air near Petroleum Sources (SNAPS).

We support monitoring, but the State already has enough information to be able to begin immediately cleaning up the pollution from oil and gas wells with the Community Air Protection Program.

The SNAPS program will take a considerable amount of time, and may not even study our community, before we see any action to protect our public health. There is no need to wait, maybe even years, for those monitoring results; the state is already in possession of scientific information to control local toxic pollution where Kern County and the Air District have failed to act, and, create a *minimum* setback between wells and our schools/homes/parks etc.

The results of the SNAPS program can then inform when and by how much to make that setback *bigger and more protective of public health*.

The Community Air Protection Program should include “early action” or “immediate” strategies for ARB/the Air District to:

1. Establish Buffer Zones/Setbacks

The CCST Report recommends that the State develop policies such as *setbacks* to protect public health by limiting exposures to harmful pollutants.



CENTER ON RACE, POVERTY & THE ENVIRONMENT

1999 HARRISON STREET, SUITE 650, OAKLAND, CA 94612 TEL 415-346-4179 FAX 415-346-8723
1012 JEFFERSON STREET, DELANO, CA 93215 TEL 661-720-9140 FAX 661-720-9483
WWW.CRPE-EJ.ORG

The CCST Report also states that, to protect public health, these setbacks are needed *now, while monitoring is happening, and not after.*

Scientific literature supports at least a 2500 feet setback between the surface locations of wells and tanks within an oil and gas site and sensitive receptors, such as schools, parks, clinics, hospitals, long term health care facilities or residences.

2. Limit Production from Oil and Gas Operations

The CCST Report found that even with emission control technologies, local pollution still increases as oil and gas production increases. Emission control technologies will not be effective unless oil and gas production also stops increasing.

3. Implement Other Recommendations from the CCST Report

The CCST Report includes other recommendations within ARB/Air District authority under AB 617. These should also be included in the State Strategy for immediate/early action and include:

- Apply and enforce emission control technologies to limit air pollutant emissions.
- Develop adequate control measures for emissions, leaks and spills.
- Control toxic air emissions from oil and gas production wells.

Sincerely,

/s/

Paulina Torres
On behalf of
Committee for a Better Arvin
Comite Progreso de Lamont
Greenfield Walking Group
Committee for a Better Shafter
Delano Guardians



CENTER ON RACE, POVERTY & THE ENVIRONMENT

1999 HARRISON STREET, SUITE 650, OAKLAND, CA 94612 TEL 415-346-4179 FAX 415-346-8723
1012 JEFFERSON STREET, DELANO, CA 93215 TEL 661-720-9140 FAX 661-720-9483
WWW.CRPE-EJ.ORG

June 19, 2018

California Air Resource Board
1001 I Street
Sacramento, CA 95814

VIA EMAIL

cotb@arb.ca.gov
communityAir@arb.ca.gov

RE: Public Workshops for the Community Air Protection Program (Program) and Study of Neighborhood Air near Petroleum Sources (SNAPS).

We have reviewed the Draft Community Air Protection Blueprint and are disheartened by ARB's lack of inclusion of the statewide setback for oil and gas operations. The Blueprint only mentions commitments to work with local cities and counties to establish defined setbacks from air pollution sources to protect sensitive populations. This is not enough.

In 2005, CalEPA and ARB released the report Air Quality and Land Use Handbook: A Community Health Perspective. The Handbook provides a clear recommendation for ARB to "consult with local air districts and other local agencies to determine an appropriate separation..." between incompatible land uses and similar industrial activities that emit similar pollutants. This was in 2005, and still, very little progress has been made. We need a statewide buffer zone for oil and gas extraction.

The Community Air Protection Program should include "early action" or "immediate" strategies for ARB/the Air District to:

Establish Buffer Zones/Setbacks

The CCST Report recommends that the State develop policies such as *setbacks* to protect public health by limiting exposures to harmful pollutants.



CENTER ON RACE, POVERTY & THE ENVIRONMENT

1999 HARRISON STREET, SUITE 650, OAKLAND, CA 94612 TEL 415-346-4179 FAX 415-346-8723
1012 JEFFERSON STREET, DELANO, CA 93215 TEL 661-720-9140 FAX 661-720-9483
WWW.CRPE-EJ.ORG

The CCST Report also states that, to protect public health, these setbacks are needed *now, while monitoring is happening, and not after.*

Scientific literature supports at least a 2500 feet setback between the surface locations of wells and tanks within an oil and gas site and sensitive receptors, such as schools, parks, clinics, hospitals, long term health care facilities or residences.

Sincerely,

/s/

Paulina Torres
On behalf of
Committee for a Better Arvin
Comite Progreso de Lamont
Greenfield Walking Group
Committee for a Better Shafter
Delano Guardians