



CENTER ON
RACE, POVERTY
& THE ENVIRONMENT



AMERICAN
LUNG
ASSOCIATION®
IN CALIFORNIA



Alliance of Nurses For Healthy
Environments



July 18, 2016

California Air Resources Board

1001 "I" St.

Sacramento, CA, 95814

Via Electronic Submittal:

http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=A

Re: Letter of Support and Suggested Improvements for the Revised Draft Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

The undersigned organizations would like to submit this letter in support of the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California.

We commend California Air Resources Board ("CARB") staff for drafting a proposal that directly regulates methane and associated emissions from a diverse suite of new and existing oil and gas sources. Many of the provisions contained in the draft represent models for the nation, including the quarterly baseline inspection requirement for facilities, the continuous ambient air quality monitoring requirement for natural gas storage facilities, and the prioritization of natural gas capture over combustion requirements for a suite of equipment. Nevertheless, there remain opportunities to further enhance the public health and welfare benefits of the rule, and to showcase California as the foremost leader in tackling serious clean air and environmental issues.

As a growing body of evidence demonstrates, there are significant negative public health and environmental impacts associated with pollution from oil and gas - and communities living nearby are the ones most affected. Studies show that along with the release of strong climate pollutants like methane, oil and gas production releases harmful co-pollutants like volatile organic compounds that contribute to ozone formation that impact lung health, and toxic chemicals like benzene, which is a known human carcinogen. The communities most impacted by oil and gas pollution are often low-income communities and communities of color that are already disproportionately vulnerable to socio-economic and environmental hazards. Residents of the most impacted communities throughout California, many of which live less than 30 feet away from production facilities, have experienced firsthand the harmful effects of oil and gas pollution. Reported symptoms from residents living near oil and gas operations have included onset of asthma and other respiratory problems, nausea, dizziness, loss of smell, and frequent migraines. Additionally, science shows that our most vulnerable and defenseless populations - children, pregnant women, and the elderly - are most susceptible to experiencing negative health impacts from oil and gas pollution.

In order to ensure that the proposed regulation results in maximum reductions in emissions that harm community health, we support CARB in its efforts to strengthen the leak detection and repair requirements applicable to facilities with the potential to leak or inadvertently vent harmful pollutants. Specifically, by removing the step down provision from the proposed draft, the rule is greatly strengthened. By allowing operators to move to relaxed annual inspection standards if leaks are not detected in the first five quarters, operators are dis-incentivized to properly detect, report, and repair leaks. Additionally, due to the century-old infrastructure that exists in most of the state, leaks may happen at any time, and strict quarterly inspections are critical for catching leaks when they are still small and manageable, and before they turn into another Aliso Canyon-scale catastrophe. For these reasons, we believe that in order for the rule to be effective in protecting the health of our families, the step down provision must be removed.

Additionally, we are concerned that the timeframe for implementing the rule has slipped by approximately one year, and believe that the implementation date should be reviewed. While we understand the need to ensure adequate time for Air District staff and industry to prepare for administration and compliance with the rule, we urge CARB to implement the rule expeditiously with no further delays, so that communities can begin experiencing the critical clean air protections afforded by the rule's many strong provisions.

Thank you for taking seriously the concerns of our communities.

Sincerely,

Irene Burga, JD
Oil and Gas, Environment Justice Fellow
Environmental Defense Fund

Madeline Stano, JD
Staff Attorney
Center on Race, Poverty & the Environment

Vinai Decena RN, PHN
Northern California Program Coordinator
Alliance of Nurses for Healthy Environments

Bonnie Holmes-Gen
Senior Director, Air Quality and Climate Change
American Lung Association in California

Scott Takahashi, PharmD
Chair
Asthma Coalition of Los Angeles County

Taylor Thomas
Research and Policy Analyst
East Yard Communities for Environmental Justice

Gisele Fong, PhD
Executive Director
EndOil

Bill Magavern
Policy Director
Coalition for Clean Air