



October 7, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I St.
Sacramento, CA 95814

Comments in response to the first public workshop to discuss potential changes to the Oil and Gas Methane Regulation

Dear Chair Randolph:

Climate Action California, 350 Humboldt, and 350 Sacramento, with more than 7,500 supporters throughout California, are pleased to submit these comments and suggestions in response to the first public workshop to discuss potential changes to the Oil and Gas Methane Regulation, held on September 20, 2022.

The IPCC has clearly stated that we are in a climate emergency, indicating that we have less than a decade to get net global CO₂e emissions down to half of 2010 levels by 2030 if we are to stay below 1.5C of global warming.¹ Unfortunately, this scenario assumes a large amount of direct atmospheric carbon removal (DAC) before 2050 to counteract the excess emissions we have not avoided. DAC technology is still in its infancy and should not be depended on to absolve us from reducing CO₂e emissions.²

We can no longer consider “economic feasibility” as a constraint to our actions: At this late date we must try to achieve what is “technically feasible” to attain this goal. When our planet is burning, we cannot afford to debate the costs of putting out the fire.

In light of this emergency, methane emissions present a perfect case of “low hanging fruit” for the following reasons:

- Methane has an atmospheric lifetime of about 12 years—which means that if we stop emitting it today its climate effects are gone within two decades.

¹ <https://www.bbc.com/news/science-environment-58130705>
<https://www.climatecentral.org/climate-matters/ipcc-6th-assessment-report-the-physical-science-basis>

² <https://www.technologyreview.com/2021/07/08/1027908/carbon-removal-hype-is-a-dangerous-distraction-climate-change/>

- Over 20 years, methane has 86 times the global warming potential (GWP) of carbon dioxide, making removal of even small amounts of methane climatically effective and buying us some time to attack the much less tractable problem of CO2 emissions.
- For the natural gas distribution network, any methane lost to leakage means loss of a saleable product. Thus, it is in the financial interest of the industry to plug these leaks.
- Compliance deadlines for curtailing emissions should be tightened regularly to encourage compliance. Similarly, fines for failure to meet deadlines should be raised annually.
- [Governor Newsom has declared his support for a windfall profits tax on the oil industry](#); a tax on methane emitters is reasonable and prudent. Emitters, who like the oil industry have reaped astronomical profits in recent years, should be required to pay all costs of mitigation and remediation, as well as the inspection and monitoring costs of regulation.

We submit the following recommendations:

1. Governor Newsom recently created the Methane Task Force, a joint effort between CalGEM and CARB to detect methane leaks and get them plugged. However, the present approach in the currently proposed Scoping Plan update—reducing methane emissions 50 percent below 2013 levels by 2030—is far too weak. We do not presume to tell you what is possible, but we suggest that you start at 100 percent by 2030 and work back from there based on what is technically feasible.

The fossil fuel companies that have destroyed our climate should be required to clean up their damaging emissions independent of the effect on their bottom line. They need to start working on a “just transition” to non-fossil energy sources to be fully completed by 2050 at the latest.

2. The methodology proposed by the task force is one of prioritization of sites. This is not appropriate unless the goal is 100 percent reduction—which is not what the Task Force indicated. Rather, in our view, the Task Force’s prioritization methodology was designed to determine what emissions will be allowed to continue. ***It is essential that CARB revise GHG emissions inventory statistics and charts for short-lived climate pollutants including methane, refrigerants, and black carbon from 100-year GWP to 20-year GWP for CO2e calculation and cost to benefit analyses.***
3. ***A new section tallying the co-pollutants from fugitive methane emissions and from methane combustion should be added***, focusing on co-pollutants that have high-GHG properties, e.g., N2O, black carbon, and PM.
4. CARB and the Air Districts should measure, regulate, and report all sources of CH4 from the oil and gas sector, not just the largest polluters. ***CARB should aim to exceed EPA EG and SIP standards to set an example for other states and inspire the EPA to step up. Specific plans to achieve these standards should be announced in 2022 along with interim targets every two years.***
5. ***We further urge CARB to conduct research on making satellite monitoring data available in 6 months, instead of the current target of 18 months.*** The annual GHG emissions inventory should be released by the end of each following year. This was emphasized in the newly proposed House bill by Don Beyer, [the Methane Super-Emitter Strategy Act of 2022](#), which designates NASA as the lead agency of the federal

effort to get data about methane super emitters, so that quicker action can be taken to mitigate the problem.

Thank you for considering these comments. If you wish to discuss any of our points, please email Stephen Rosenblum, Ph.D., at pol1@rosenblums.us, or call him on (650) 213-6175. We look forward to working with you.

Sincerely,

Stephen Rosenblum,
Ph.D. chemistry
Steering Committee
Climate Action California
(formerly 350 Silicon
Valley Legislation/Policy)

Daniel Chandler, Ph.D.
Legislative Committee
Chair
350 Humboldt

William Brieger
Legislation Team Chair
350 Sacramento