



Paulina Torres  
18-5-3

**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](http://WWW.CRPE-EJ.ORG)

June 28, 2018

California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

**Re: Public Comment on June Board Meeting, Discussion Item 18-5-3: Public Meeting to Hear an Update on Implementation of Assembly Bill 617 (The Community Air Protection Program)**

Chair Nichols and Members of the Board,

The Center on Race, Poverty and the Environment thanks the Board and CARB staff for this opportunity to comment on the progress staff has made in implementing AB 617. We want to stress the importance of including a statewide setback for oil and gas operations, in addition to ARB's commitment to working with local jurisdictions.

The Draft Community Air Protection Blueprint does not mention the implementation of a statewide setback for oil and gas operations. The Blueprint simply speaks in vague terms about encouraging and working with local jurisdictions to implement setbacks. For all the reasons set forth below and in our previous letter recommending oil and gas strategies, CRPE urges the board to prioritize a statewide setback in CARB's 617 statewide strategy.

The San Joaquin Valley residents attended the Technical Summits, previous Board meetings, and AB 617/SNAPS workshops to provide specific examples of early action measures encouraged by CARB staff. The residents noted the significant public health impacts and risks of living in such proximity to active or poorly abandoned oil and gas extraction wells, with inadequate regulatory oversight. Certainly, pursuant to SB 4, the California Natural Resources Agency commissioned the California Council on Science and Technology to conduct an independent scientific assessment of oil and gas extraction operations, including fracking, in California. A report of the assessment was released *practically three years ago*, detailing recommendations to reduce toxic and criteria pollution in areas of the San Joaquin Valley that face a cumulative burden of the more than 85% of well-stimulation events that occur in California. To date, absent the initiation of the SNAPS program, little has been done to implement these recommendations. Those recommendations

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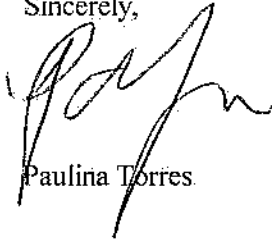
LUKE W. COLE (1962-2009) EXECUTIVE DIRECTOR 1997-

include the following, and we emphasize, to be initiated before the completion of monitoring studies:

1. *Surface setbacks* to protect public health by limiting exposures to harmful pollutants.
2. *Limiting Production* to achieve actual pollution reductions.
3. *Adequate control measures* for toxic air emissions, leaks and spills.

These recommendations fit squarely within the ambit of AB 617's statewide strategy, and the early action items to achieve immediate pollution reductions detailed in the Concept Paper. Although we are disheartened of CARB's failure to mention a statewide setback for oil and gas operations in the Blueprint, we are hopeful CARB is seriously considering such a measure in assessing its duties under AB 617.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paulina Torres', with a stylized, cursive script.

Paulina Torres