



March 24, 2016

Chair Mary Nichols and Board Members of the  
**California Air Resources Board**  
1001 I Street  
Sacramento, California, 95814  
<http://www.arb.ca.gov/lispub/comm/bclist.php>

Re: Aliso Canyon Climate Impacts Mitigation Program Recommendations

Dear Chair Nichols and Members of the Air Resources Board,

The California Environmental Justice Alliance (CEJA) appreciates your attention to the Aliso Canyon methane leak matter and we urge you to consider these recommendations in the Aliso Canyon Climate Impacts Mitigation Program.

CEJA is a statewide coalition of grassroots, community-based organizations and we represent over 30,000 individuals in low-income communities and communities of color. We unite the local organizing of our members to advance environmental justice in statewide policy. Our members work in low-income communities and communities of color highly impacted by pollution and socioeconomic stressors.

CEJA is alarmed at the enormity of the greenhouse gas emissions, reportedly reaching approximately 60,000 kilograms of methane per hour<sup>1</sup> (or about 132,000 pounds/hour), or one quarter of the entire state's methane emissions.<sup>2</sup> Many of the communities that will be most impacted by climate change are environmental justice communities who already suffer disproportionate environmental burdens.

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<sup>1</sup> California Air Resources Board (CARB): *Aliso Canyon Natural Gas Leak Preliminary Estimate of Greenhouse Gas Emissions*, March 08, 2016, p. 1, available at: [http://www.arb.ca.gov/research/aliso\\_canyon/aliso\\_canyon\\_natural\\_gas\\_leak\\_updates-sa\\_flights\\_thru\\_March\\_8\\_2016.pdf](http://www.arb.ca.gov/research/aliso_canyon/aliso_canyon_natural_gas_leak_updates-sa_flights_thru_March_8_2016.pdf)

<sup>2</sup> California Air Resources Board (CARB): *Aliso Canyon Natural Gas Leak Preliminary Estimate of Greenhouse Gas Emissions*, November 20, 2015, at p. 2, available at: [http://www.arb.ca.gov/research/reports/aliso\\_canyon\\_natural\\_gas\\_leak.pdf](http://www.arb.ca.gov/research/reports/aliso_canyon_natural_gas_leak.pdf)

The Aliso Canyon methane leak exemplifies why California must transition away from all forms of fossil fuels, including natural gas. Natural gas power plants are a form of fossil fuels that often get sited in low-income and communities of color. These power plants spew large quantities of methane into the atmosphere with up to 20-70 times the global warming potential of carbon dioxide and are known to lead to respiratory illnesses such as asthma, especially among our most vulnerable populations. Rather than expanding outdated and destructive natural gas plants, California should look to clean local renewable energy sources, and prioritize siting of renewable energy in disadvantaged communities.

Per your February 2016 presentation, the ARB must develop a Mitigation Program that will be “achieved in an equitable and transparent manner” and must consider “co-benefits, transformational qualities, and benefits to affected and economically disadvantaged communities”.<sup>3</sup>

To this end, we urge the ARB to:

1. Encourage the use of the CalEnviroScreen 2.0 to identify disadvantaged communities for both program goals of “enhancing the sustainability of the State’s renewable energy infrastructure” and “addressing sources of methane emissions that fall outside of the State’s legal framework for greenhouse gas reductions, or which lack a financially responsible party. This is important to both ensure that any disproportionate burdens of methane emissions in environmental justice communities are addressed, and to ensure that these same communities are prioritized for renewable energy and energy efficiency programs. CalEnviroScreen was created by the California Office of Environmental Health Hazard Assessment (“OEHHA”) as the tool “to identify areas that are disproportionately affected by pollution and areas that are socioeconomically disadvantaged”.<sup>4</sup>
2. Ensure that any projects undertaken as part of the mitigation program does not result in negative localized impacts for disadvantaged communities. There is serious concern that many of the proposed waste and agricultural mitigation projects, such as dairy co-digestors, have negative environmental impacts for the adjacent communities. These localized negative impacts include, but are not limited to increased: pm 2.5, diesel, compound that contribute to ozone, groundwater contamination, traffic congestion, and increased truck traffic.
3. Use mitigation program funds to create local renewable energy and energy efficiency programs for disadvantaged communities. ARB should also explore opportunities to fund innovative projects that have multiple health, climate and environmental justice benefits through the mitigation funds.

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<sup>3</sup> <http://www.arb.ca.gov/board/books/2016/021816/16-2-1pres.pdf>

<sup>4</sup> OEHHA, CALIFORNIA COMMUNITIES ENVIRONMENTAL HEALTH SCREENING TOOL, VERSION 2.0 ii (Aug. 2014), available at <http://oehha.ca.gov/ej/pdf/CES20Finalreport2014.pdf> (hereinafter “CalEnviroScreen Final Report”).

4. Prioritize local renewable energy programs in disadvantaged communities that bring public health and economic and jobs benefits to disadvantaged communities. Prioritize local distributed generation (1 megawatt or less) that includes small-scale rooftop solar, local community solar projects, small scale wind turbines, and energy storage. Particular emphasis should be paid to households that currently lack access to centralized energy systems. With the passage of AB 2672 (Salas) in 2014, there has been a focus on expanding natural gas infrastructure to disadvantaged community households in the San Joaquin Valley. As the Aliso Canyon leak has shown, there are significant risks to natural gas and the mitigation funds could provide critical funding to bring these households that need increased energy infrastructure directly onto renewables.
5. Prioritize energy efficiency projects in disadvantaged communities that will lower utility bills, improve the health inside buildings, and achieve benefits for both the landlord and the tenants. The ARB should prioritize projects such as zero net energy buildings in all new building construction and retrofits in municipal buildings in disadvantaged communities.

In addition, we maintain that closure of the gas storage facility is the necessary and required response. At minimum, we urge the Air Resources Board to:

- 1) Order SoCal Gas to continue to meet the neighbors' demands and protect public health;
- 2) Ensure that ongoing Air Quality Management District monitoring at the site and in neighborhoods includes methane, VOCs, sulfur compounds, and any other emissions that have the potential to impact health and the environment;
- 3) Order SoCal Gas to stop the gas leaks as expeditiously as possible;
- 4) Levy the maximum possible penalties/fines for every day the leaks continue;
- 5) Require SoCal Gas to make all details of its plans and timelines to stop the leaks public;
- 6) Require SoCal Gas to immediately pay for independent experts to evaluate whether these plans are as expeditious as possible;
- 7) Require SoCal Gas to fund zero carbon renewable energy sources, especially zero carbon replacements for residential natural gas, that would offset an equivalent amount of greenhouse gases emitted by the leaks; and
- 8) Require SoCal Gas to pay for an independent public study of methane leaks of all its facilities, including storage, pipelines, processing, distribution and other facilities in the District, and recommendations for preventing further leaks.

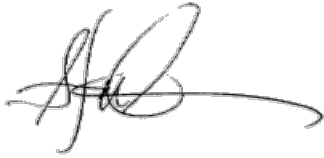
By prioritizing environmental justice and disadvantaged communities in the Mitigation Program, the ARB will ensure progress toward the climate, renewable energy, and greenhouse gas reduction mandates in both SB 350 (the Clean Energy and Pollution Reduction Act) and Governor Brown's Executive Order<sup>5</sup> to increase renewable energy to 50 percent by 2030 and reduce greenhouse gases by 40 percent below 1990 levels.

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<sup>5</sup> <https://www.gov.ca.gov/news.php?id=18938>

As a statewide coalition that is leading the efforts to bring equitable climate and energy policies and programs to the most vulnerable communities, we urge you to incorporate these recommendations in the Aliso Canyon Climate Impacts Mitigation Program.

Sincerely,

A handwritten signature in black ink, appearing to be 'Strela Cervas', with a long horizontal flourish extending to the right.

Strela Cervas  
Co-Director

A handwritten signature in black ink, appearing to be 'Amy Vanderwarker', with a long horizontal flourish extending to the right.

Amy Vanderwarker  
Co-Director