

February 21, 2017

Elizabeth Scheehle, Branch Chief, Oil and Gas and GHG Mitigation Branch  
California Air Resources Board  
1001 "I" St., Sacramento, CA, 95814

Via Electronic Submittal:

[https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm\\_period=1](https://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=1)

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

Dear Ms. Scheehle,

Please accept this letter on behalf of 32 environmental justice, public health, and public interest institutions representing millions of Americans in support of the proposed rule to regulate greenhouse gas emissions from oil and gas facilities in California.

We commend the 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. The provisions contained in the draft represent a model for the nation, including the quarterly baseline inspection requirement for facilities, the use of continuous ambient air quality monitoring along the fencelines of natural gas storage facilities, and the prioritization of natural gas capture over combustion requirements for a suite of equipment. This draft demonstrates the public health and welfare benefits of the rule, and showcases California as the foremost leader in tackling serious clean air and environmental issues.

While we applaud the agency's effort to enact a strong rule, we are concerned that the timeframe for adopting the rule and implementing its provisions continues to slip – with the implementing timeframe delayed at least a year from the initial regulatory proposals. Additionally, we urge the Board to enumerate a well-developed implementation plan that lays out a detailed roadmap for how CARB and local air pollution districts will work together to effectively and efficiently implement the new regulations, including the timetable for periodic government audits of newly regulated facilities. Since the air pollution from oil and gas operations is a global problem, it is imperative for California to take strong action in ensuring the best leak-detection and repair technology is being used and inspections are being enforced – only then will a clear example be set for the rest of the nation and the world demonstrating what is possible.

As a growing body of evidence demonstrates, there are significant negative public health and environmental impacts associated with pollution from oil and gas, with many of the worst impacts falling on communities adjacent to oil and gas operations. Short-lived pollutants like methane are warming the planet in ways that impact us at the local level. 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, impacting lung health, and toxic chemicals like benzene, which is a known human carcinogen. In fact, CARB's recently published report, titled "Enhanced Inspection & Maintenance for GHG & VOCs at Upstream Facilities," verifies the presence of toxic compounds in many of the identified leaks within the 39 oil and gas facilities sampled throughout California in 2015. It is clear from this data that the need to diminish leaks for economic, climate and health reasons is pressing.

Unfortunately, but not surprisingly, 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, some of which live fewer than 30 feet away from active 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. These reports have been corroborated by studies showing, among other things, that increased residential oil and gas production increases the risk of asthma exacerbations. 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. To address these concerns, we recommend the rule roll-out, both by the state and local air districts, prioritize implementation, consistent and timely oversight, and regulatory enforcement at facilities in close proximity to disadvantaged communities and low-income communities of color identified in the top 25% of CalEnviroScreen 3.0.

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 maintain stringent leak detection and repair requirements applicable to facilities with the potential to leak or inadvertently vent harmful pollutants. For these reasons, we applaud CARB for remaining committed to requiring quarterly inspections - without a step down. As the rule is implemented, leaks should become less prevalent due to the increased inspection, repair and oversight requirements – this is a beneficial and intended result. However, data shows that the industry has

a long way to go before frequent inspections lose their benefits. Studies show the way to combat the problem of super-emitters and oil and gas leaks is frequent inspection and maintenance – such requirements must remain in place even as emissions decline. For these reasons, CARB's decision to reject a step-down provision for leak inspections is critical toward ensuring that the rule is sufficiently protecting the health and welfare of nearby communities.

Thank you for taking seriously the concerns of our communities.

Sincerely,

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

Catherine Garoupa-White  
Californians Against Fracking

Jane Williams  
Executive Director, California Communities Against Toxics

Diana Vazquez  
Policy Advocate, California Environmental Justice Alliance (CEJA)

Jena Price  
Legislative Affairs Manager, California League of Conservation Voters (CLCV)

Bill Magavern  
Policy Director, Coalition for Clean Air

Keith Nakatani  
Oil and Gas Program Manager, Clean Water Action

Michele Hasson, MPP  
Policy Director, Center for Community Action & Environmental Justice (CCA EJ)

Sue Chiang  
Pollution Prevention Director, Center for Environmental Health

Madeline Stano  
Staff Attorney, Center for Race Poverty and the Environment

Nayamin Martinez  
Director, Central California Environmental Justice Network

Dolores Weller  
Director, Central Valley Air Quality (CVAQ) Coalition

Paul Ferrazzi  
Executive Director, Citizens Coalition for a Safe Environment (CCSE)

Darin Schroeder  
Associate Attorney, Clean Air Task Force

Jonathan Parfrey  
Executive Director, Climate Resolve

Jennifer Krill  
Executive Director, Earthworks

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

Dan Jacobson  
State Director, Environment California

Timothy O'Connor  
Director of California Oil and Gas, Environmental Defense Fund

Bill Allayaud  
California Director of Government Affairs, Environmental Working Group

Patricia McPherson  
President, Grassroots Coalition

Jeff Kuyper  
Executive Director, Los Padres ForestWatch

Loni J. Cortez Russell  
Deputy Field Manager, Western States, Moms Clean Air Force

Briana Mordick, Senior Scientist  
Meleah Geertsma, Senior Attorney  
Natural Resources Defense Council

Joel Ervice  
Associate Director, Regional Asthma Management and Prevention (RAMP)

Matt Pakucko  
President and Co-Founder, Save Porter Ranch

Elly Benson  
Staff Attorney, Sierra Club

Dan York  
Vice President, The Wildlands Conservancy

Jason Barbose  
Western States Policy Manager, Union of Concerned Scientists

Sandra Fluke  
California State Director, Voices for Progress

Dr. Elizabeth Dougherty  
Director, Wholly H2O

