

**Air Resources Board**  
**the Greenhouse Gas Emission Standards**  
**and Natural Gas Facilities**

**California**  
**Proposed Amendments to**  
**for Crude Oil**

Thank you for drafting these amendments. Collectively, they will provide a wide array of benefits for the fossil fuel industry and all CA residents. The amendments would be even more effective if the proposed magnitudes and durations were more stringent. The proposed baby steps should be replaced with bold strides.

**VENTING**

Venting should be phased out wherever feasible, e.g., at well casings and from fracking operations. It should also be minimized by requiring equipment upgrades to non-venting technologies.

**INSPECTION AND MONITORING**

Field monitoring, inspection, and report drafting should be conducted by CARB staff or a CARB-selected contractor. CARB is to provide job descriptions, performance standards, orientation, and on the job training. Owners of fossil infrastructure are to reimburse CARB for the entire cost of these services. This protocol avoids the risks of owners performing in ways that are inaccurate or at variance with CARB standards. It also prevents delays caused by owners having difficulties finding qualified labor.

**COST TO BENEFIT**

The following paragraphs address Initial Statement of Reasons Appendix 8 and 9 as well as Economic Analysis Appendix, Appendix B., section III Cost Savings.

Costs of the proposed regulation are probably justified by benefits to the fossil fuel industry and benefits to all CA residents. It is recommended that CARB conduct a cost to benefit analysis that provides an itemization of economic and noneconomic benefits to CA residents. It is to be based on the latest estimates of Social Cost of Carbon released by EPA, using the lowest discount rate.

The annual SCC for CA using these parameters is billions of dollars (dwarfing the \$100M allocated by CA gov. for addressing CH<sub>4</sub> emissions from the fossil sector). Provide a range of estimates (low, medium, high) per ton of emissions reduction of each GHG and each toxic air contaminant co-pollutant. Count fugitive emissions as well as combustion emissions. Use a 20-year duration of GWP for CH<sub>4</sub>, because within this

time nearly all of it has naturally degraded into other gasses. This will concentrate costs over a 20-year duration, rather than spreading them over a century (100-year GWP).

Our large urban areas have the worst air quality of any state in the nation. About 70% of this is due to the use of fossil fuels. This indicates that CA is failing in its aspiration to be recognized as a climate leader. CARB scientists are urged to lead the board to adopt more effective mitigation regulations for GHGs and toxic air contaminants. The sixth synthesis report of the IPCC indicates that this is an urgent matter requiring significant progress by 2030. The CARB Scoping Plan 2022 is not up to the task of achieving this because it targets larger annual mitigation magnitudes in years after 2030. The SP would be improved by performing cost to benefit analyses outlined above.

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Submitted on 24 May 2023

[https://www.resources.org/common-resources/the-us-environmental-protection-agency-introduces-a-new-social-cost-of-carbon-for-public-comment/?mc\\_cid=33116766a8](https://www.resources.org/common-resources/the-us-environmental-protection-agency-introduces-a-new-social-cost-of-carbon-for-public-comment/?mc_cid=33116766a8)

[https://www.whitehouse.gov/wp-content/uploads/2023/04/DraftCircularA-4.pdf?utm\\_source=Sailthru&utm\\_medium=email&utm\\_campaign=Future%20Perfect%204/12/23&utm\\_term=Future%20Perfect](https://www.whitehouse.gov/wp-content/uploads/2023/04/DraftCircularA-4.pdf?utm_source=Sailthru&utm_medium=email&utm_campaign=Future%20Perfect%204/12/23&utm_term=Future%20Perfect) OBM has proposed that a discount rate of 1.7% be used in cost to benefit analyses.

<https://knowablemagazine.org/article/society/2022/the-obscure-calculation-transforming-climate-policy>

<https://iopscience.iop.org/article/10.1088/2752-5309/acc886>

<https://www.nrdc.org/resources/clean-energy-now-safer-climate-future>

Final 2022 IEPR Update - Clean Version See Appendix B re. Cost to benefit.