



Change. Not Charity

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California Air Resources Board
1001 I Street
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Via Electronic Submittal: http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=oilandgas2016&comm_period=A

Re: Comments urging strengthening of CARB's Proposed Regulation on Oil & Natural Gas Production, Processing, and Storage

The Liberty Hill Foundation wishes to offer brief comments on the proposed Oil and Natural Gas Production Processing, and Storage (the "Oil & Gas rule") regulation. We appreciate efforts of the California Air Resources Board (CARB) in developing the regulation, and urge the strengthening of measures to prevent practices leaving communities unprotected.

Our foundation staff does not possess the technical expertise to make detailed and specific comments. However, we are acutely aware of the significant health impacts that specific communities in Los Angeles have suffered due to their proximity to active oil and gas drilling operations. For the last twenty years, Liberty Hill has been a significant funder of grassroots, environmental justice organizations in the Los Angeles region.

Liberty Hill issued a report in September 2015, "[DRILLING DOWN: The Community Consequences of Expanded Oil Development in Los Angeles](#)", documenting five examples of neighborhoods severely impacted by health ailments and disruption to their quality of life from noise, vibration and other air quality impacts. It is very clear that the pollutants and chemicals associated with oil and gas production are harmful to human health, in addition to the strong climate/GHG impacts of methane. Further, we are keenly aware that the industry has been insufficiently regulated and that much of the infrastructure—as demonstrated by the Aliso Canyon disaster—is in a state of significant disrepair. And, the close proximity of some of the facilities in densely populated urban areas like Los Angeles—some within just a few dozen feet of homes and schools—is of great cause for concern.

We encourage the CARB to carefully review the detailed, technical letter submitted by Julia May, Senior Scientist with Communities for a Better Environment which calls for tighter leak standards consistent with best practice in oil refinery standards, accelerated implementation and strengthening of deadlines, exemption allowances, monitoring and enforcement requirements. We also encourage careful review of the letter submitted by Environmental Defense Fund which also calls for accelerated implementation, as well as the removal of the "step down" provision which relaxes the inspection schedule.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Michele Prichard".

Michele Prichard
Director, Common Agenda