

ATTACHMENT D

FINDINGS and STATEMENT OF OVERRIDING CONSIDERATIONS

Introduction

The California Air Resources Board (ARB), as the lead agency for the proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities (Proposed Regulation), prepared a Draft Environmental Analysis (EA) in accordance with its certified regulatory program (Cal. Code Regs., tit. 17, §§ 60000 – 60008) to comply with the requirements of the California Environmental Quality Act (CEQA) (Pub. Resources Code, §21000, *et seq.*). The Draft EA, entitled *Draft Environmental Analysis prepared for the proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities*, and included as Appendix C to the Staff Report (Initial Statement of Reasons), provided an analysis of the potential environmental impacts associated with the Proposed Regulation. Following circulation of the Draft EA for a 45-day public review and comment period from June 3, 2016, through July 18, 2017, ARB prepared the *Final Environmental Analysis prepared for the proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities* (Final EA) which includes minor revisions to the Draft EA. The Final EA was posted on ARB's webpage on March 10, 2017. While minor modifications have been made to the EA to ensure it reflects the proposed project as accurately as possible, these changes merely clarify, amplify, or make insignificant modifications to the otherwise-adequate Draft EA. Therefore, there is no significant new information that would require the Final EA to be recirculated.

The Final EA is based on the expected compliance responses of the regulated entities covered by the Proposed Regulation. Although the policy aspects and requirements of the Proposed Regulation do not directly change the physical environment, there are potential indirect physical changes to the environment that could result from reasonably foreseeable actions undertaken by entities in response to the Proposed Regulation. These indirect impacts are the focus of the programmatic-level impacts analysis in the Final EA.

The Final EA concluded that compliance responses to the Proposed Regulation, which is designed to reduce methane emissions from specified oil and gas facilities within California, would result in beneficial impacts from reduced greenhouse gas (GHG) emissions, considering the total impact on climate change from the mix of emissions which may result from compliance. Specifically, although the majority of methane controlled by this rule is likely to be captured without combustion, some methane may be combusted. Use of a destructive vapor control device (i.e. low-NOx combustion devices) for disposal of this subset of vapors would result in an increase in CO₂ emissions associated with the combustion of the collected vapors (including methane). However, methane has a far more powerful impact on climate change than CO₂ on a molecule-by-molecule basis. This means that combusting methane and the associated conversion produces beneficial reductions of GHG emissions, even when accounting for CO₂ combustion emissions; as the Final EA explains, the total GHG emissions impacts on the atmosphere results in a substantial net reduction in GHG impacts on global warming. Therefore, the Proposed Regulation's associated climate change impacts would be beneficial. Furthermore, another likely compliance response, routing

collected vapors to a fuel gas system for powering on-site equipment, in lieu of the conventional fuel, would result in a net reduction in GHG emissions as the need for conventional fuel would be displaced and the transport of the conventional fuel would no longer be required.

The Final EA further concluded that the Proposed Regulation could result in: less than significant impacts or no impacts to aesthetic resources, agriculture resources, air quality, energy demand, hazards and hazardous materials, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and utilities and service systems; and potentially significant and unavoidable adverse impacts to biological resources, cultural resources, geology and soils, and hydrology and water quality. These impacts are largely associated with short-term construction activities associated with control equipment in oil and gas facilities, which are generally already heavily environmentally altered sites. (Attachment 2 of the Final EA provides a table with a summary of impacts.)

ARB's certified regulatory program requires that before adoption of an action for which significant adverse environmental impacts have been identified during the review process, ARB consider feasible mitigation measures and alternatives that could substantially reduce the impacts. (Cal. Code Regs, tit. 17, §60006.) CEQA places the burden on the approving agency to affirmatively show that it has considered feasible mitigation and alternatives that can lessen or avoid identified impacts through a statement of findings for each identified significant impact. (Pub. Resources Code, §21081.) CEQA Guidelines section 15091 provides direction on the content of the statement of findings. That section states that one or more of the following findings should be identified for each impact:

- Changes or alterations have been required in, or incorporated into, such projects which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.
- Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.
- Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

Because the potential adverse impacts identified in this programmatic level EA are potential indirect impacts associated with the compliance responses of covered entities, the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with local permitting authority, such as city or county governments and local air districts. ARB does not have the ability to determine with any specificity the project level impacts, nor the authority to require project level mitigation in approving the proposed regulations, as discussed in the findings below.

An agency may approve a project with unavoidable (unmitigated) adverse environmental impacts. When doing so, CEQA requires the agency to make a statement in the record of its views on the ultimate balancing of the merits of approving the project despite the

environmental impacts in a “statement of overriding considerations” (Pub. Resources Code, §21081(b); Cal. Code Regs, tit. 14, §15093.) The following presents the Board’s statement of findings for each significant adverse impact identified in the EA, accompanied by a brief explanation, and its statement of overriding considerations.

STATEMENT OF FINDINGS

The Board has independently reviewed and considered the entire record, including the information contained in the EA, public testimony, written comments received, and the written responses to environmental comments, all of which are hereby incorporated by reference. The Board makes the following written findings for each significant adverse impact identified, accompanied by a brief explanation of the rationale for each finding. These findings are supported by substantial evidence in the record.

Biological Resources

Finding and Explanation

Implementation of the Proposed Regulation would result in installation or replacement of gathering lines and piping, flanges, valves, low-NOx combustion devices, tanks, pneumatic devices and pumps, and other similar features already associated with oil and gas facilities. Additionally, the Proposed Regulation would result in the installation of ambient air monitoring equipment and wellhead sensors at natural gas underground storage facilities. The EA found that biological resources could be affected by the installation of piping and temporary staging areas associated with facility modifications. In general, oil and gas facilities exist on sites that are, or have been, subjected to severe disturbance including grading, trenching, paving, and construction of roads and structures. Nonetheless, there are plant and animal species that occur, or even thrive, in developed settings. Any new oil and gas facilities would involve similar types of disturbance, and any additional compliance responses required by the Proposed Regulation would essentially be subsumed by the level of construction impacts associated with any such general oil and gas facility development. Therefore, short-term construction-related impacts on biological resources could be potentially significant.

The EA includes Mitigation Measure 4.a, which identifies existing statutes and regulations and operating permit requirements, as well as other recognized practices designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 4.a is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 4.a should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the ability and authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource. Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could

be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the Proposed Regulation would be potentially significant and unavoidable.

Cultural Resources

Finding and Explanation

Implementation of the Proposed Regulation would result in installation or replacement of gathering lines and piping, flanges, valves, low-NOx combustion devices, tanks, pneumatic devices and pumps, and other similar features already associated with oil and gas facilities. Additionally, the Proposed Regulation would result in the installation of ambient air monitoring equipment and wellhead sensors at natural gas underground storage facilities. While the majority of these activities would not require substantial earth-moving activities that could affect cultural resources, some trenching may be necessary to install piping. Limited grading may also take place to allow for installation of new equipment and infrastructure. The EA found that implementation of the Proposed Regulation could potentially affect cultural resources through ground disturbance activities that may include prehistoric and historical archaeological sites, paleontological resources, historic buildings, structures, or archaeological sites associated with agriculture and mining, and heritage landscapes. Any new oil and gas facilities would involve similar types of disturbance, and any additional compliance responses required by the Proposed Regulation would essentially be subsumed by the level of construction impacts associated with any such general oil and gas facility development. Therefore, short-term construction-related impacts on cultural resources associated with the Proposed Regulation would be potentially significant.

The EA includes Mitigation Measure 5.a, which identifies existing statutes and regulations and operating permit requirements, designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 5.a is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 5.a should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the ability and authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource. Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the Proposed Regulation would be potentially significant and unavoidable.

Geology and Soils

Finding and Explanation

Implementation of the Proposed Regulation would result in installation or replacement of gathering lines and piping, flanges, valves, low-NOx combustion devices, tanks, pneumatic devices and pumps, and other similar features already associated with oil and gas facilities. Additionally, the Proposed Regulation would result in the installation of ambient air monitoring equipment and wellhead sensors at natural gas underground storage facilities. The EA found that construction activities could occur but with uncertainty as to the exact location. Construction activities resulting from the Proposed Regulation could require disturbance of undeveloped areas on existing oil facilities, such as clearing of vegetation, earth movement and grading, and trenching for piping installation. Any new oil and gas facilities would involve similar types of disturbance, and any additional compliance responses required by the Proposed Regulation would largely be subsumed by the level of construction associated with general oil and gas facility development. In general, the potential to result in these types of disturbances would be associated with trenching for new piping or preparation for construction staging areas. Underground piping alignments and staging areas could be located in a variety of geologic, soil, and slope conditions with varying amounts of vegetation that would be susceptible to soil compaction, soil erosion and loss of topsoil during construction. Therefore, short-term construction-related impacts to soil and geologic resources associated with the Proposed Regulation could be potentially significant.

The EA includes Mitigation Measure 7.a, which identifies existing statutes and regulations and operating permit requirements, designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 7.a is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 7.a should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the ability and authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource. Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the Proposed Regulation would be potentially significant and unavoidable.

Hydrology and Water Quality

Finding and Explanation

Implementation of the Proposed Regulation would result in installation or replacement of gathering lines and piping, flanges, valves, low-NOx combustion devices, tanks, pneumatic devices and pumps, and other similar features already associated with oil and gas facilities.

Additionally, the Proposed Regulation would result in the installation of ambient air monitoring equipment and wellhead sensors at natural gas underground storage facilities. The EA found that earth-moving activities that could affect hydrology and water quality would be primarily limited to installation of gathering lines and piping to route collected vapors to a process operation, sales gas system, microturbines, fuel gas system, gas disposal well, or vapor control devices. However, limited grading may also take place to allow for installation of new equipment and infrastructure. These activities would be limited to the boundary of an oil and gas facility, which would have already obtained grading permits, Stormwater Pollution Prevention Plans (SWPPPs), and complied with other hydrology and water quality related regulations as part of the initial construction of initial project development. Any new oil and gas facilities would involve similar types of disturbance, and any additional compliance responses required by the Proposed Regulation would essentially be subsumed by the level of construction associated with general oil and gas facility development. However, the specific design details, siting locations, and conditions within a facility are not known at this time and would be analyzed on a site-specific basis at the project level. Therefore, short-term construction-related impacts to hydrologic resources associated with implementing the Proposed Regulation could be potentially significant.

The EA includes Mitigation Measure 10.a, which identifies existing statutes and regulations and operating permit requirements, designed to reduce these potentially significant impacts. The Board finds that the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Therefore, the Board finds that the authority to implement Mitigation Measure 10.a is within the responsibility and jurisdiction of other public agencies, and that the requirements and practices in Mitigation Measure 10.a should be adopted by those agencies. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the ability and authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource. Consequently, at this stage without full details on the design of potential programs and associated required mitigation, while impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the impacts to this resource associated with the Proposed Regulation would be potentially significant and unavoidable.

Cumulatively Considerable Impacts

The cumulative analysis of the Proposed Regulation, which is designed to reduce greenhouse gas (GHG) emissions, primarily methane, from crude oil and natural gas facilities, relied on the summary of projections contained in the Environmental Analysis (EA) prepared for the 2014 First Update to the Climate Change Scoping Plan (Scoping Plan Update EA). The Scoping Plan Update EA provided a program level review of significant adverse impacts associated with the reasonably foreseeable compliance responses that appeared most likely to occur as a result of implementing the recommended actions identified in each of the nine sectors discussed in the Scoping Plan Update, including the Proposed Regulation within the Energy Sector, along with the expected background growth in

California. The analysis of cumulative impacts for the Proposed Regulation included a summary of the cumulative impacts found for each resource area in the Scoping Plan Update EA and a conclusion regarding whether the Proposed Regulation could result in a cumulatively considerable contribution to an existing significant cumulative impact identified in the Scoping Plan Update EA.

The EA concluded the Proposed Regulation could result in a cumulatively considerable contribution to significant cumulative impacts to biological resources, cultural resources, geology and soils, and hydrology and water quality. While suggested mitigation is provided within the respective resource areas of the EA analyses that could address the contribution of the Proposed Regulation to each of these potentially cumulatively considerable impacts, the Board finds that because these adverse impacts are potential indirect impacts associated with the compliance responses of covered entities, the authority to determine site- or project-specific mitigation is within the purview of jurisdictions with land use approval and permitting authority, such as city or county governments. Public agencies with authority can and should implement the identified measures to the degree feasible. Because the ability and authority to determine project-level impacts and require project-level mitigation lies with land use and/or permitting agencies for individual projects, and the programmatic level of analysis associated with the EA does not attempt to address project-specific details of mitigation, there is inherent uncertainty in the degree of mitigation that may ultimately be implemented to reduce potentially significant impacts to this resource. Consequently, while cumulative impacts could be reduced to a less-than-significant level by land use and/or permitting agency conditions of approval, the Board takes a conservative approach in its post-mitigation significance conclusion and finds the cumulatively considerable contribution of the Proposed Regulation to existing significant cumulative impacts to biological resources, cultural resources, geology and soils, and hydrology and water quality to be potentially significant and unavoidable.

Findings on Alternatives to the Project

In addition to the No-Project Alternative, the EA considered a reasonable range of alternatives that could reduce or eliminate the significant adverse environmental impacts associated with the Proposed Regulation, while accomplishing most of the project objectives.

The Board finds the alternatives analysis is sufficient to inform the Board and the public regarding the tradeoffs between the degree to which the alternatives could reduce environmental impacts and the corresponding degree to which the alternatives could achieve the project objectives.

Based upon a full evaluation of the alternatives, and the entirety of the record, the Board finds that adoption and implementation of the Proposed Regulation is the most desirable, feasible, and appropriate action for achieving the objectives of the project, and the Board rejects the other alternatives because they either fail to meet most project objectives, or are infeasible based on consideration of the relevant factors identified in the EA and briefly described below:

Alternative 1: No Project Alternative –

Alternative 1 in the EA describes a reasonably foreseeable scenario if ARB did not approve the Proposed Regulation. Under the No-Project Alternative, oil and gas facilities would maintain their current operations and maintenance activities. No specific set of actions would be required to reduce methane emissions from oil and gas facilities. There would be no requirements to install vapor collection systems, maintain reciprocating compressors, replace or retrofit centrifugal compressor seals, replace or retrofit gas-powered pneumatic devices and pumps, establish leak detection and repair programs for methane, or to do the other actions associated with the Proposed Regulation.

The Board finds that under this alternative the air quality and GHG emission benefits associated with the Proposed Regulation would not occur. Therefore, this alternative would not meet the fundamental objectives associated with the Proposed Regulation to reduce methane, and, as co-benefits, secure reductions (or avoid significant increases of) criteria air pollutants, VOCs, and TACs and would not be consistent with the goals of the First Update to the Scoping Plan or the Proposed Short Lived Climate Pollutant Plan, to the extent that proposed plan is adopted. Further, the option would not be consistent with the existing statutory mandates that are shaping these plans and ARB's activities generally. The No Project Alternative does not support ARB's compliance with its legislative mandates to reduce greenhouse gas emissions, supporting the goals of AB 32, which include securing continued greenhouse gas reductions and ensuring that the statewide greenhouse gas limit is maintained (See, e.g., Health & Saf. Code §§ 38551, 38560, 38562), or with ARB's mandate to reduce methane emissions specifically per SB 1383 and other relevant statutes (See, e.g., Health & Saf. Code §§ 39730, 39730.5). Accordingly, alternatives that do not achieve these mandates are inconsistent with ARB's legislative direction. Therefore, the No Project Alternative would not meet the most basic objectives of the project. Furthermore, adoption of the No Project Alternative does not create an environmentally advantageous outcome because although the potentially significant impacts related to the compliance responses of the proposed regulations as identified in the EA would not occur, the beneficial impacts related to GHG emissions and air quality would also not be realized. For this reason, the Board rejects this alternative.

Alternative 2: No Enhanced Monitoring at Natural Gas Underground Storage Facilities Alternative

Alternative 2 is to propose no enhanced monitoring at natural gas underground storage facilities. This removes the requirement to monitor ambient air at the facility and to screen each well and the surrounding areas daily or continuously. There would be no alternative compliance responses; operators of natural gas underground storage facilities would be required to comply with the other provisions of the Proposed Regulation.

The Board finds this alternative would meet most of the project objectives associated with reductions in methane emissions and achieving co-benefit pollutant reductions (or avoiding significant increases of these pollutants). It would also generally be consistent with complementary strategies, including the existing Scoping Plan and the First Scoping Plan Update. Emissions would be reduced, and continue to be reduced beyond 2020. Low-income communities would not be disproportionately impacted by this alternative. However, this Alternative would not achieve the early detection of leaks or failure and may result in methane super emitters going undetected. This Alternative would not be capable of fully meeting the project objective of limiting fugitive and vented emissions from natural gas

underground storage facilities and does not fully support the Proposed Short-Lived Climate Pollutant Reduction Strategy. Nor would it address statutory mandates to enhance storage facility monitoring (See, e.g., Health & Saf. Code § 42710). While adoption of this alternative does create an environmentally advantageous outcome in that exclusion of this provision would reduce the potential adverse environmental impacts associated with the Proposed Regulation, the alternative as proposed would not meet the objectives of the project to the same degree as the Proposed Regulation and could result in adverse environmental impacts if methane super emitters go undetected. For these reasons, the Board rejects this alternative.

Alternative 3: No Vapor Collection Systems Alternative

Alternative 3 is to propose no new vapor collection systems. This removes the option to collect and pipe vapors to an existing sales gas system, microturbines, fuel gas system, existing gas disposal well, an existing vapor control device, or new destructive or non-destructive vapor control device. Compliance responses would be limited primarily to removing from service all equipment that exceeds the standards established in the Proposed Regulation; replacement of pneumatics, reciprocating compressor rod packing seals, and centrifugal compressor wet seals; or LDAR activities. For example, compliance options for tanks would be limited to flash analysis testing of the tank and removal of the tank if the results exceed the emission rate thresholds established in the Proposed Regulation. Circulation tanks would be required to comply with the LDAR requirements of the Proposed Regulation and if the LDAR standard was exceeded, operations that required use of the circulation tank could not continue. This Alternative would likely result in the closure of potentially large portions of oil and gas operations.

The Board finds this alternative would meet most of the project objectives associated with reductions in methane emissions and achieving co-benefit pollutant reductions (or avoiding significant increases of these pollutants). It would also generally be consistent with complementary strategies, including the Scoping Plan and Proposed Short-Lived Climate Pollutant Reduction Strategy. Emissions would be reduced, and continue to be reduced beyond 2020. Low-income communities would not be disproportionately impacted by this alternative. While adoption of this alternative does create an environmentally advantageous outcome in that exclusion of this provision would reduce the potential adverse environmental impacts associated with the Proposed Regulation, this alternative would, however, not be capable of fully meeting the project objective of achieving technologically feasible, cost-effective emission reductions that achieve, to the extent feasible, additional economic benefits for California. This is because it would not take advantage of cost-effective low-emitting combustion technologies and instead require closures of more facilities. Accordingly, this alternative would achieve emission reductions but at higher costs. For this reason, the Board rejects this alternative.

STATEMENT OF OVERRIDING CONSIDERATIONS

ARB expects that many of the significant adverse impacts identified in the EA will be avoided or mitigated; however, since uncertainty exists as to the extent of mitigation that other agencies will require at the site- and project-specific level, the Board is conservatively considering the impacts to be significant and unavoidable. The Board finds that despite the potential for adverse environmental impacts associated with the Proposed Regulation, other

benefits of this regulatory action are determined to be overriding considerations that warrant approval of the Proposed Regulation and outweigh and override its unavoidable significant impacts. Each benefit set forth below constitutes an overriding consideration warranting approval of the project, independent of the other benefits, despite each and every unavoidable impact. These benefits are described at length in the Initial Statement of Reasons and EA, which are hereby incorporated by reference, and are summarized here as follows:

1. Consistent with the need to reduce emissions of methane, a potent climate-change-causing pollutant, by controlling vented and fugitive methane emissions from new and existing onshore and offshore crude oil or natural gas production; crude oil, condensate and produced water separation and storage; natural gas gathering and boosting stations; natural gas processing plants; natural gas transmission compressor stations; and, natural gas underground storage;
2. Achieving reductions of VOC and TACs related to oil and gas production and well stimulation, as a co-benefit through these control strategies; and

Maintaining and continuing reductions in emissions of GHG beyond 2020, in accordance with AB 32 (See, e.g., Health & Saf. Code, § 38551(b), 38562) and SB 1383 and other short-lived climate pollutant mandates (Health & Saf. Code §§ 39730, 39730.5); pursue measures that implement reduction strategies covering the State's GHG emissions in furtherance of California's mandate to reduce GHG emissions to 1990 levels by 2020 and to continue reductions thereafter; and to cut methane emissions by 40% from 2013 levels by 2030.

3. Providing enhanced monitoring of oil and gas underground storage facilities consistent with legislative mandates (See, e.g., Health & Saf. Code § 42710) and to reduce environmental risk to California communities by reducing the risk of large leaks from these facilities.

LOCATION AND CUSTODIAN OF THE RECORD

The documents and other materials that constitute the record of proceedings on which these findings are based are located at 1001 I Street Sacramento, CA 95814. The custodian for these documents is the California Air Resources Board Legal Office. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and 14 CCR § 15091(e).