



July 18, 2016

California Environmental Protection Agency
Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Notice of Public Hearing to Consider the Proposed Regulation for Greenhouse Gas Emission Standards for Crude Oil and Natural Gas Facilities

The Sierra Club has collected public comments submitted by Sierra Club members and supporters on the Air Resources Board's draft safeguards against methane pollution from oil and gas facilities. The Sierra Club has collected those comments in trust and is submitting them now to be included in the public record.

Please find those comments in two attached files: One with the names and public comments of 196 members and supporters who submitted a personalized public comment, and one with the names of 7,281 members and supporters who signed on to endorse the message reproduced below:

I'm writing to thank the Air Resources Board for developing critically important rules to address methane pollution from the oil and gas industry in California, and to urge the agency to quickly finalize these safeguards.

Full implementation of these new protections would make California a national leader in reining in out-of-control methane pollution from the oil and gas industry. The comprehensive scope of these rules -- including addressing both new and existing sources, both onshore and offshore infrastructure, and setting monitoring standards for natural gas storage sites like Aliso Canyon -- avoid many of the loopholes and weaknesses of other state and federal standards.

However, in addition to ensuring that these rules aren't weakened in any way, I urge the Air Resources Board to strengthen a few provisions, including:

- Require operators to regularly find and fix leaks, and remove the provision allowing operators to "step-down" from quarterly to annual inspections depending on whether they find leaks;
- Do not exempt sources of methane such as low-bleed pneumatics;
- Ensure that agency cost estimates take into account the value of reducing pollution from oil and gas industry in California communities, including reducing exposure to toxics.

The massive, nearly four-month-long methane leak in Porter Ranch was a wake up call that the lax regulation of existing oil and gas facilities is an immediate threat to our health and our climate. That's why I support these new safeguards and urge the Air Resources Board to implement the strongest rules possible without delay.

Thank you for your consideration.

I also ask that you disregard the public comments submitted in error by the Sierra Club earlier today, and accept these in their place.

Sincerely,

Lena Moffitt
Director, Sierra Club Beyond Dirty Fuels Campaign