

December 10, 2020

Department of Conservation
801 K Street, MS 24-02
Sacramento, CA 95814
E-mail: CalGEMRegulations@conservation.ca.gov

Re: Benefits of a 2,500-foot Setback

To the California Geologic Energy Management Division:

We, the undersigned organizations, submit this letter in support of recent [comments](#) filed by Voices in Solidarity against Oil in Neighborhoods (or VISIÓN). We urge the California Geologic Energy Management Division (CalGEM) to move quickly to protect Californians from the harmful impacts of drilling for oil and gas.

Our organizations are members of the Last Chance Alliance, formed to address the ongoing climate, health, and environmental justice emergency caused by the oil and gas industry in California. Last Chance Alliance members are environmental, health, justice, faith, labor, community, parent, and consumer organizations calling on California's elected leaders to stop new fossil fuel development, phase out existing oil and gas production through a just transition, and immediately implement a minimum 2500-ft health and safety buffer zone between oil and gas activities and where people live, work, and go to school.

California's oil and gas production pollutes the air we breathe with toxic chemicals, and research has consistently found that people living near drilling sites experience higher rates of severe health problems, including cancer and increased asthma attacks. Among pregnant women, living closer to drilling sites increases the risk of birth defects and premature births. Is it also important that CalGEM recognize the negative health impacts of living close to oil and gas extraction in California are not shared by all communities. Black, Indigenous, and People of Color and low-income communities historically and currently bear the brunt of these health harms. A setback that protects these communities is part of the ongoing work to end environmental racism in California.

Neither these health harms—nor the benefits of avoiding such adverse effects—can be reduced to numerical cost-benefit analysis. Regulatory analyses have a history of undervaluing the public health benefits of regulations and overestimating the costs to industry, while attempting to reduce people's health and lives to a monetized figure. Life and health cannot be reduced to one side of a "ledger" and compared against the dollars gained from producing oil. Using cost-benefit analysis alone omits and obscures the true value of life, health, and important benefits pertaining to quality of life that cannot be quantified.

But even when CalGEM considers economic factors, those clearly weigh in favor of a setback of at least 2,500 feet, as demonstrated by the recent [comments](#) filed by VISIÓN. A 2,500-ft or greater health and safety buffer would provide significant economic benefits by reducing preventable deaths, diseases, and illnesses; reducing the serious public safety impacts of oil and gas operations; reducing the harm that communities face from orphaned wells; and reducing the disruption, burdens, and cost of traffic experienced by frontline residents.

As CalGEM develops its draft rule, the agency must go beyond a narrow cost-benefit analysis and consider additional broad-based benefits that would result from the far-ranging action needed to truly protect public health. These benefits include:

1. Qualitative benefits of improved physical and mental health, improved quality of life, reduced stress, greater equity and environmental justice, and restoring native habitat near homes and schools.
2. Benefits from reduced oil and gas production, including cuts in greenhouse gas emissions, improved air quality, less downstream pollution from refineries, fewer oil spills, and mitigation of the worst effects of climate change.
3. Additional benefits from regulations that truly protect public health and avoid the worst effects of the climate emergency. For example, halting permits for new oil and gas production and implementing a rapid phase out and just transition would further increase many of the health and climate benefits listed above.

We urge CalGEM to prioritize public health first and foremost in its rulemaking and to move quickly to establish a 2500-ft or greater health and safety buffer zone to protect communities from the harms of oil and gas extraction. CalGEM should complement this measure with an immediate halt to new fossil fuel development and begin the needed phase out of existing oil and gas production through a just transition that protects workers and communities.

Sincerely,

1. Kathy Dervin, MPH, 350 Bay Area Action
2. Sherry Lear, 350 South Bay Los Angeles
3. RL Miller, California Democratic Party
4. Allis Druffel, California Interfaith Power & Light
5. Hollin Kretzmann, Center for Biological Diversity
6. Nayamin Martinez, Central California Environmental Justice Network
7. Liz Beall, Climate First: Replacing Oil & Gas
8. RL Miller, Climate Hawks Vote
9. Cynthia Mahoney, Climate Health Now
10. Liza Tucker, Consumer Watchdog

11. Colin O'Brien, Earthjustice
12. Jennifer Krill, Earthworks
13. Linda Krop, Environmental Defense Center
14. Alexandra Nagy, Food & Water Watch
15. Sandy Emerson, Fossil Free California
16. Nicole Ghio, Friends of the Earth
17. Caroline Henderson, Greenpeace USA
18. Veronica Wilson, Labor Network for Sustainability
19. Samuel Molina, Mi Familia Vota
20. Sandy Naranjo, Mothers Out Front
21. Madeline Rose, Pacific Environment
22. Dianna Cohen, Plastic Pollution Coalition
23. David Braun, Rootskeeper
24. Ken Hough, Santa Barbara County Action Network
25. Katherine O'Dea, Save Our Shores
26. Lauren Cullum, Sierra Club California
27. Jack Eidt, SoCal 350 Climate Action
28. Wilder Zeiser, Stand.earth
29. Shoshana Wechsler, Sunflower Alliance
30. Kobi Naseck, Sunrise Bay Area
31. Riddhi Patel, Sunrise Kern
32. Josiah Edwards, Sunrise Los Angeles
33. Anna Cummins, The 5 Gyres Institute
34. Ellie Cohen, The Climate Center
35. Mad Stano, The Greenlining Institute
36. Jackie Nuñez, The Last Plastic Straw