



California Air Resources Board
1001 I Street
Sacramento, CA 95814
Submitted via email at snaps@arb.ca.gov

ATTENTION: Johnathan Bluffer

**RE: Study of Neighborhood Air Near Petroleum Sources in Lost Hills, California
Draft Final Report**

To Whom it May Concern:

The signed organizations submit this comment letter in response to the release of the Lost Hills Study of Neighborhood Air Near Petroleum Sources (SNAPS) data. Our feedback is intended to seek clarification and improvements to the data presented and to provide feedback to improve the overall SNAPS program. Our organizations in different capacities have long supported the residents of Lost Hills and their fight to breathe clean air.

First off, we appreciate that this study was the first of its kind and focused on a rural oil-producing town. We appreciate the capacity and resources that the California Air Resources Board (CARB) put into the SNAPS study and that it was appropriately focused on understanding how pollution affects public health. Because of the study, we now have a better understanding of pollution sources and the cumulative cancer risk in Lost Hills. However, being the first to do something also means there is room for improvement and lessons to be learned with partners who are engaged, including residents. We have provided some ideas based on our experience and look forward to working with CARB to improve both the program and the health of Lost Hills residents.

Our comments fall into the following categories:

- The delay in releasing the report impacted community trust in the process;
- The delay in the release of the report directly impacted public health;

- The findings should include health impacts as well as atmospheric conditions;
- The report could better incorporate community expertise; and
- The data presented justifies a need for continued monitoring, including a permanent local state monitor and consistent testing for key constituents.

The delay in releasing the report impacted community trust in the project:

Community members who were engaged from the beginning and were very enthusiastic of the project had a growing sense of frustration and confusion. This was due to the four years it took to release the report. We understand that the restrictions of the COVID-19 lockdown delayed the initial analysis of the data; however, residents and advocates believe the many-year delay was not justified. Our organizations planned to rely on this data to guide our next steps in promoting community health and protection from harmful contaminants. Our frustration was exacerbated by the lack of information provided about the reasons for or possible extent of the delay.

We recommend that the SNAPS program be improved to ensure that:

- Community monitoring programs from the outset establish, in partnership with the community, clear timelines for data collection and publication; and
- A clear and transparent community process be established for the duration of the SNAPS program, including program development, implementation and evaluation, with data and information shared with the community at each stage.

The delay in release of the report directly impacted public health:

Acrolein, which is identified as having acute health effects as well as being a newly identified carcinogen, was detected at an alarming level during the SNAPS monitoring. Residents should have been made aware of this and been provided immediate education and preventative action to reduce exposure and improve the health and life of the community members. We appreciate the commitment of staff to update the acrolein test method and return to Lost Hills to develop a better understanding of the sources of this contaminant. We look forward to working with CARB and with OEHHA on this matter.

Moving forward, we recommend that:

- Future monitoring programs include a quick release and response process when unexpected results indicate an increased risk to the community; and
- Staff work with the Lost Hills community to develop and implement an action plan to reduce exposure to acrolein.

The findings should include health impacts as well as atmospheric conditions:

While we find the link between atmospheric conditions and pollutant concentrations valuable, we would appreciate it if those findings could be augmented with more health-focused information that is already included in those sections.

Specifically, we recommend:

- Finding 2, amended to read:
 - *Finding 2: Atmospheric conditions strongly influenced pollutant concentrations in Lost Hills. Stable atmospheric conditions which often occur overnight can trap emissions, causing increased concentrations of air pollutants.*
- Findings 5, 6, 7 and 11 identify when peak concentrations of various pollutants were detected. We'd appreciate it if these findings could also include whether and when these concentrations exceeded air quality stands.

The report could better incorporate community expertise:

We appreciate the close coordination with Lost Hills community members and the provision of a call-in number to catalog community complaints in sync with the monitoring data. We do believe that community experience could have been better used to bolster the collected data. For instance, residents have historically reported strong odors and symptoms in the times where locally sourced pollutants are most present, which is between the hours of 4 and 8 in the morning when this community generally goes to work or takes their students to school. Symptoms often noted in this time frame are: headaches, nausea, drowsiness, nose bleeds, irritation of the eyes, nose, throat and skin. These issues have, over the past decade, been consistently reported to the local air district. That reporting data could be used to reinforce these findings.

Also, we have found that community health surveys provide important information about health impacts. While the community may be too small for statistically significant findings, the development of this data for several communities could provide important information about the actual impacts of living in proximity to oil/gas fields.

We recommend that SNAPS monitoring be combined with robust community health surveys.

The data presented justifies a need for continued monitoring, including a permanent state monitor and consistent testing for key constituents:

While the data in the document shows several similarities between Bakersfield and Lost Hills, it also shows an increased need for consistent state oversight. The SNAPS monitoring program found several problems that would not have been detected in their absence and could be recurring now, including gas leaks in the SoCalGas pipelines and at the gas plant.

Additionally, this data was collected prior to the expansion of Hwy 46 and collected alarming levels of black carbon. The nearby hazardous waste landfill has also been expanded, with trucks using Lost Hills Road to approach Hwy 46.

The report provides limited information about the impact of local agriculture and programs to mitigate that impact. The discussion of dairies in section 5.2.3 of the report is puzzling, since the nearest dairy is several miles east (downwind) of Lost Hills. Of greater

concern to the community is the nearby presence of significant agricultural land and its impact on community air quality. For more than two weeks in late August and early September 2023, a fire on Wonderful Company property blew smoke into the community, creating a health crisis. Without state air monitors on site to alert officials, it took 72 hours and a phone-calling campaign by Lost Hills residents to generate action from local and state officials.

We recommend that board staff:

- Establish a permanent monitoring site at Lost Hills Road and Highway 46 to monitor black carbon emissions to better understand the impact of diesel emissions on the community;
- Work with the community to develop a leak detection protocol for local gas lines, the gas plant and the nearby oil fields;
- Identify appropriate numbers and locations for ongoing monitoring of PM 2.5 and other contaminants that could necessitate an emergency response.

We appreciate your time and effort dedicated to this project and we look forward to seeing the recommendations reflected in the final report. Thank you.

Sincerely,

Jesus Alonso

Kern Community Organizer and Environmental Justice Advocate
Clean Water Action/Clean Water Fund

Saul Ruiz

Presidente
Comite Lost Hills En Accion

Jasmin Martinez

Coalition Coordinator and Kern Resident
Central Valley Air Quality Coalition

Cesar Aguirre

Associate Director, Air and Climate Programs
Central California Environmental Justice Network

Gustavo Aguirre Jr

Climate And Environmental Justice Associate Director
Central California Asthma Collaborative