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November 25, 2019

Administrator Andrew Wheeler

U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Oil and Natural Gas Sector: Emission Standards for New, Reconstructed, and Modified Sources Review

EPA Administrator Andrew Wheeler,

We, the undersigned organizations, who are deeply invested in the public health and environmental well-being and justice of Latinxs communities write to express our support of maintaining the 2016 New Source Performance Standards for the oil and gas industry, which provides regulations under the Environmental Protection Agency's (EPA) Clean Air Act to help combat climate change and reduce air pollution that harms public health. Reducing the emissions from oil and gas development is an urgent issue for our Latinx communities in the U.S.

The reduction of harmful air pollution and actions to combat climate change under the 2016 New Source Performance Standards would directly improve the health and well-being of Latinx communities across the country who are among the first and worst impacted by climate change and unhealthy air quality, both of which are exacerbated by pollution from the oil and gas industry.

The EPA's mission is to "protect human health and the environment,"¹ however, we believe that the current proposal seeks to do the opposite by putting the interests of the oil and gas industry ahead of human health and the environment as the EPA seeks to "significantly decrease unnecessary burdens on domestic energy producers."²

As of 2015, 1.81 million Latino individuals lived within a half mile of an oil and gas facility—those within this half mile radius have cause for concern about potential health impacts from oil and gas-related air pollution. Activities and components at new oil and gas production sites release methane – the primary ingredient in natural gas, and a potent climate force – and air pollutants that are known to have harmful health impacts including polycyclic aromatic hydrocarbons, hydrogen sulfide, particulate matter, sulfur

¹ <https://www.epa.gov/aboutepa/our-mission-and-what-we-do>

² <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source>

dioxide, volatile organic compounds (VOCs) and nitrogen oxides (NOx).^{3, 4, 5} Some of these pollutants are linked to cancer, heart attacks, and chronic illnesses.

VOCs and NOx are precursors to ozone, which is known to affect respiratory health conditions such as asthma, emphysema, and bronchitis.⁶ On a regional and continental scale, methane also acts as an ozone precursor,⁷ because it is also a VOC. Additionally, the climate warming impacts of methane and other greenhouse gases create an environment ripe for ozone formation.

The air in many Latinx communities violates air quality standards for ozone.⁸ Asthma has a disproportionate impact on Latino families, as Latino children are twice as likely to die of asthma as non-Latino whites.⁹ Poor air quality results in 750,000 summertime asthma attacks in children and 500,000 missed school days. Among adults, this pollution results in 2,000 asthma related emergency room visits and 600 hospital admissions and 1.5 million reduced activity days.¹⁰

The EPA's current methane rule helps Latinxs and Americans across the country who are experiencing the devastating impacts of climate change that are exacerbated by pollution from the oil and gas industry. A recent Latino Decisions poll study found that more than half of Latinos (65%) say they have personally experienced the effects of climate change within the last five years.¹¹ A Yale University study found that 74% of Latinos would like to see President Trump and his administration, including the EPA, do more to address climate change.¹² Climate change is destroying our communities and homes whether it be intense flooding due to hurricanes in Texas and North Carolina or the more than 3,000 deaths due to the impacts of Hurricane Maria to the American people of Puerto Rico.

This is why addressing methane pollution from the oil and gas industry is so important. Solutions to cut methane emissions are readily available and highly cost effective, and they will help save a valuable

³ EPA. (2019). Health and Environmental Effects of Particulate Matter (PM). Retrieved from <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>

⁴ U.S. EPA. (2019). Sulfur Dioxide Basics. Retrieved Nov. 6, 2019, from <https://www.epa.gov/so2-pollution/sulfur-dioxide-basics#effects>

⁵ Stohl, A., Klimont, Z., Eckhardt, S., Kupiainen, K., Shevchenko, V. P., Kopeikin, V. M., & Novigatsky, A. N. (2013). Black carbon in the Arctic: The underestimated role of gas flaring and residential combustion emissions. *Atmospheric Chemistry and Physics*, 13(17), 8833–8855. doi:10.5194/acp-13-8833-2013

⁶ U.S. EPA. (2018). Ground-level Ozone Basics. Retrieved Nov. 6, 2019 from <https://www.epa.gov/ground-level-ozone-pollution/ground-level-ozone-basics#effects>

⁷ Isaksen, I.S.A., et al. (2014). Atmospheric Ozone and Methane in a Changing Climate. *Atmosphere* 5, 518-535; doi:10.3390/atmos5030518

⁸ Quintero, A., Jaffee, V., Madrid, J., Ramirez, E., & Delgado, A. (2011). U.S. Latinos and Air Pollution: A Call to Action. Retrieved from <https://www.nrdc.org/sites/default/files/LatinoAirReport.pdf>

⁹ CDC 2016. Death rates for children 0-17 years of age, 2012-2014 (deaths per 1,000,000). cited in U.S. Department of Health and Human Services Office of Minority Health. (2016). Asthma and Hispanic Americans. Retrieved from <http://minorityhealth.hhs.gov/omh/browse.aspx?lvl=4&lvlID=60>

¹⁰ http://www.catf.us/wp-content/uploads/2016/09/CATF_Pub_LatinoCommunitiesAtRisk.pdf

¹¹ http://www.latinodecisions.com/files/3315/4178/7503/EDF_Xtab_2018.pdf

¹² Leiserowitz, A., Cutler, M., & Rosenthal, S. (2017). *Climate Change in the Latino Mind*. Yale University. New Haven, CT: Yale Program on Climate Change Communication.

American energy source while protecting our health and mitigating the impacts of climate change on Latinxs and all Americans.

Weakening these common sense, cost-effective oil and gas pollution standards will hurt the communities where these developments exist and ignore the EPA's responsibility to protect the health and safety of American families. We call on EPA to maintain and fully implement the 2016 New Source Performance Standards and reject any proposals to weaken or roll back these standards.

Sincerely,

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