

July 14, 2020

Meeting with OMB - EPA Methane Rollback

RE: Regulation Identification Numbers

Methane and Transmission & Storage Rescission: 2060-AT90

Technical Leak Detection and Repair Changes: 2060-AT54

I am Meg Ruxton, E2 Chapter Director from San Francisco. As an attorney and consultant, for over eight years I have worked on electric transportation initiatives to promote the adoption of electric cars, bikes, scooters, and public transit throughout CA. My work involves creating strategic public private partnerships with automakers, charging infrastructure providers, public utilities, nonprofits and government entities. The environmental benefits including clean air from electric transportation which produces zero emissions are what motivate all of the partners in this space. Now more than ever, we need to make clean air a paramount factor in decision making.

The current proposal to eliminate the EPA methane rule is a major step backward in addressing the climate crisis. These rollbacks are an effort to dramatically weaken pollution limits at new oil and gas facilities. It would enable the oil and gas industry to release millions of tons of methane, a potent greenhouse gas, and other harmful pollutants such as volatile organic compounds (VOCs) into the air our families breathe, posing a serious threat to public health and the climate.

As we face the impacts of COVID-19—a public health crisis that is unprecedented in our lifetimes—the importance of clean air protections for our families and communities has never been clearer.

- Scientists have known for decades that air pollution is harmful to health and this is especially true for vulnerable populations such as older adults, people with underlying health conditions, communities of color, pregnant women, and children.
- Living near a polluting source or breathing air pollution over a long period increases the risk of health impacts from pollution. We know air pollution contributes to asthma, respiratory (lung) disease, and cardiovascular (heart) disease.
- EPA's attacks on critical air pollution and climate change protections will add to the burden of asthma in communities of color, indigenous populations, and low-income communities while exacerbating existing inequities and putting families at increased risk of serious health issues.
- The [CDC](#) states that people with underlying medical conditions such as asthma, respiratory (lung) disease and cardiovascular (heart) disease can be at higher risk for severe illness from COVID-19.

Studies have shown that there is a connection between COVID-19 deaths and air pollution. People with certain respiratory illnesses and other conditions linked to prolonged exposure to poor air quality are at higher risk to coronavirus. Recently, researchers at Harvard

University published a [study](#) showing a statistical link between coronavirus deaths and patients with long-term exposure to pollution, especially fine particles.

[<https://projects.iq.harvard.edu/covid-pm>]

- EPA's efforts to deregulate industries in ways that increase air pollution, harms communities of color and low-income communities where COVID-19 is disproportionately killing black people, Indigenous people, and other people of color.
- During a pandemic that harms people with respiratory issues, the EPA should be working overtime to fulfill its mission to protect our health and the environment.

Hidden in the virus fallout are lessons to making the world a better place and optimism that we can make needed changes to address environmental threats. We have enjoyed cleaner air during shelter in place because of the reduction in air pollution which is good for our health and planet. As we return to normal, we can move towards a better future. Regulations that keep our air clean should be kept in place.

Respectfully,

Meg Ruxton