



**CENTER ON RACE, POVERTY & THE ENVIRONMENT**

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December 11, 2014

State Water Resources Control Board  
Lawrence Livermore National Laboratory

**Comments re: Environmental Justice Considerations for model criteria for groundwater monitoring in areas of oil and gas production**

The Center on Race Poverty and the Environment (CRPE) is a national environmental justice organization providing legal, organizing, and technical assistance to grassroots groups in low-income communities and communities of color. We have worked in Kern County for the past 25 years and have been working with community members concerned about fracking for over a year. Environmental justice is the belief that all people have the right to live, work, play and pray in a healthy environment, regardless of their race, place or income.

As you are no doubt aware, a majority of new and active oil and gas wells are located in Kern, Los Angeles and Ventura counties. As of November 2014, 1081 of the last 1089 fracking wells have been sited in Kern County. A recent study by NRDC found that 92% of Californians living within a mile of an active or new oil or gas well are people of color. Clearly this is an environmental justice issue.

This is also a serious issue for the children in our communities. A recent FracTracker study found that school districts with greater Hispanic and non-white student enrollment are more likely to contain more oil and gas drilling and stimulation. Schools campuses with greater Hispanic and non-white student enrollment are more likely to be closer to more oil and gas drilling and stimulation. Students attending school within 1 mile of oil and gas wells are predominantly non-white (79.6%), and 60.3% are Hispanic.

Sequoia Elementary School is located in Shafter, CA and we have been working with many of the families whose children attend Sequoia. Sequoia is within one half mile of 3 separate hydraulically fractured/stimulated wells. One of the wells is less than 1200 feet from the school. Over 800 students attend Sequoia Elementary and 86% of the students are Hispanic.

PROVIDING LEGAL & TECHNICAL ASSISTANCE TO THE GRASSROOTS MOVEMENT FOR ENVIRONMENTAL JUSTICE

RALPH SANTIAGO ABASCAL (1934-1997) DIRECTOR 1990-1997

LUKE W. COLE (1962-2009) EXECUTIVE DIRECTOR 1997-2009

Parents have told us that their kids have had increased health issues since the drilling began. Obviously with so many pollutants in the area it is impossible to definitively correlate the increased poor health to the wells. But what we can say is that parents are reporting that their children have gotten sicker since the drilling began near the school.

What our communities want is not just to be considered, but prioritized, during this process. When you and others are contemplating how to monitor or enforce or permit, what should lead the discussion is the acknowledgment that people, families, and children are living near these sites. They are breathing the air, gardening in the soil, and drinking the water. Your decisions should center around this key question: If you were living next to one of these sites, what would you need to feel safe - to ensure that the water you are drinking or that your children are bathing or playing in is safe. Because those are the questions our communities have been asking for over a year and they are looking to you all to find the right answers.

Also, be mindful that monitoring alone does not help protect the communities living near the sites. Our communities need you to develop a monitoring protocol that will include rapid response, public notification, and enhance enforcement efforts. Make sure you get it right and put protection at the top of the list of priorities.

Thank you,

Sofia Parino  
Senior Attorney