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February 27, 2017

Board Members

South Coast Air Quality Management District Hearing Board
21865 Copley Drive
Diamond Bar, CA 91765

Subject: Aliso Canyon Health Study Settlement and Proposed Action by Hearing Board to Terminate Order for Abatement (Case No. 137-76)

Dear Board Members:

We understand tomorrow you will be voting on whether or not to terminate the subject Order for Abatement which directed the Southern California Gas Company (SoCalGas) to conduct a health study in connection with the natural gas disaster in Aliso Canyon. We request that the Hearing Board hold in abeyance any action to terminate this Order.

It was our expectation that the subject Order for Abatement would result in a health study design consistent with recommendations from the panel of health experts convened by the South Coast Air Quality Management District (SCAQMD). This panel included health experts from the County Department of Public Health, State OEHHA, CDPH, CARB, USEPA, SCAQMD, and academic researchers from USC and UC Irvine. However, the Settlement Agreement of February 7, 2017 between the SCAQMD and SoCalGas included a scope of work for a study that is completely irreconcilable with the scope of work agreed upon in December 2016 by the SCAQMD's panel of health experts. It is also troubling that the settlement document indicates SoCalGas is absolving itself of further responsibility to fund a health study.

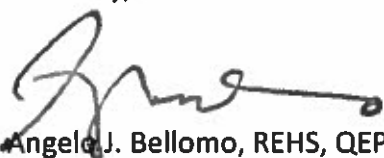
We began discussions with SCAQMD staff regarding the health study implementation plan on March 16, 2016. At that time, our agencies had a mutual understanding of two requirements for a successful health study: 1) an independent scientific advisory committee to recommend a research strategy, and 2) community participation throughout the health study process.

Subsequently, SCAQMD convened the panel of health experts to define a scope of work for the health study. The panel met on October 26, 2016, and agreed upon critical components of a prospective health study, including, but not limited to, estimation long-term toxicological risks; the need to address existing data gaps, particularly with respect to sulfur odorants; long-term environmental and health monitoring; and evaluation of broader impacts of the leak on quality of life and well-being. The \$1 million allocation and scope of work included in the settlement does not effectively address these components, and would not contribute useful information to a prospective health study.

We therefore request that the Hearing Board vote against the proposed action to terminate the subject Order for Abatement. The Order should remain open until sufficient funding is provided by SoCalGas for a health study that accomplishes the goals set forth by the Order and further outlined by the panel of health experts. Short of this, the health needs of residents affected by the Aliso Canyon natural gas disaster will remain unmet.

We are available to provide additional information to your Board as it continues to deliberate on this most important matter.

Sincerely,



Angelo J. Bellomo, REHS, QEP
Deputy Director for Health Protection

AJB/

cc: Cynthia Harding
Barbara Ferrer
Jeffrey Gunzenhauser
Robert Ragland