

August 1, 2017

Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Mail Code: 1101A
Washington, D.C. 20460

Re: Oil and Natural Gas Sector; Emission Standards for New, Reconstructed, and Modified Sources: Stay of Certain Requirements, Docket ID No. EPA-HQ-OAR-2010-0505

Dear Administrator Pruitt:

In keeping with Jewish tradition, which compels us to care for the Earth and stand up for the vulnerable, the Coalition on the Environment and Jewish Life – a project of the Jewish Council for Public Affairs, which is the network hub of the Jewish community relations field – strongly opposes the Environmental Protection Agency’s (EPA) proposed two-year stay on key components of the 2016 New Source Performance Standards.

We urge the EPA withdraw its proposal to delay the methane emission rule. This unnecessary delay undermines crucial environmental protection efforts while posing unnecessary risks to children, communities of color, and others who are vulnerable to environmental injustices. It would endanger public health, worsen air quality, and further contribute to climate change.

According to the EPA’s own research and that of the IPCC, methane is a most potent greenhouse gas – its 100-year global warming potential is 34 times that of carbon dioxide; its 20-year potential is 86 times as great. As the largest industrial source, the oil and gas industry can do the most to reduce emissions. According to the Environmental Defense Fund, which works closely with key corporate leaders on this, the oil and gas industry could cut methane pollution by over 40% for less than one penny per thousand cubic feet of gas produced – and your agency’s rule ensures that it does so quickly, for the public good.

Methane emissions contribute to asthma attacks, cancer, and other health issues. Poor air quality subjects children and communities of color to especially heightened threats (as the EPA acknowledges in Appendices G and J). The risks these communities would face if the rule were delayed demonstrates the importance of upholding the rule in its current form. Two additional years of exposure to public health threats are significant, especially for children.

That two year delay is also significant for the global climate: our tradition teaches that even where experts disagree, a measure with a reasonable chance of saving lives (*pikuach nefesh*) must be enacted.

The 2016 regulation has already undergone extensive review, with input from industry and the public. Given the moral urgency of curbing our emissions, it would be irresponsible to reopen a

time-consuming and redundant rulemaking process. The EPA must swiftly implement and faithfully enforce all parts of the 2016 rule, to uphold its commitment to the environment and to the health of all Americans.

Jewish teachings – which do celebrate individual liberty – have for centuries emphasized that society still needs regulations, to balance private economic interests with public health and welfare. Reducing methane emissions is essential to caring for all of God’s creation, as logic and tradition compel us to do. Delaying or weakening the methane rule contradicts both the EPA’s core mission of protecting human health and the environment, and the Jewish community’s sacred commitment to stewardship. We stand in firm, faith-based opposition to the proposed delay, and urge you to withdraw the Stay.

Sincerely,

Rabbi Fred Scherlinder Dobb
Chairperson
Coalition on the Environment and Jewish Life