

Communication from Public

Name: Nicole Levin

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Council File No: 21-0065

Comments for Public Posting: Dear Honorable Councilmembers, I am writing on behalf of the Sierra Club and our members in Los Angeles City in regards to item 21-0065 at the upcoming city council meeting. We are very pleased to see that the council has taken our previous comments and concerns into account and is moving forward with increased franchise fees and a bonding study. As the city moves forward with its historic phase out, increased bonding, fees and enforcement mechanisms will be necessary for ensuring the clean up of wells. Bonding requirements at the city and state level are much lower than the true cost of clean up. While the City has well bonding requirements separate from those required under state law, they are inadequate to protect taxpayers. The City should require significantly higher amounts to reflect the true cost of well abandonment and site remediation. This process should also require operators to submit an estimate of their projected remediation costs in comparison to their current bonding amounts. According to this California Council on Science and Technology (CCST) report, the remediation costs in LA City are much higher than the statewide average, so the City is justified in requiring a higher amount to fully cover true estimates for remediation. The City could also require higher bonding levels for any operator with a history of safety and environmental violations. In addition to the proposed motion, the City has the legal authority to call on the state to assist in the expedited remediation of idle wells. Specifically, the City can submit requests to CalGEM for a list of idle wells (Cal. Pub. Res. Code § 3206.5(a)) and ask CalGEM to issue remedial orders to require proper plugging and abandonment, especially where current bonding is inadequate. Bonding requirements and fees as funding mechanisms are already identified in the 2018 LA City Controller report, so there is a strong basis for the City to move forward with these recommendations. Thank you for considering our comments and for your leadership to protect our communities, environment and climate. Sincerely, Nicole Levin, Campaigner Beyond Dirty Fuels Campaign, Sierra Club



Friday, Dec 1, 2022

Los Angeles City Council
Energy, Climate Change, Environmental Justice & River Committee
Room 1010, City Hall
200 N. Spring St.
Los Angeles, CA 90012

RE: Agenda item 21-0065

Dear Honorable Councilmembers,

I am writing on behalf of the Sierra Club and our members in Los Angeles City in regards to item 21-0065 at the upcoming city council meeting.

We are very pleased to see that the council has taken our previous comments and concerns into account and is moving forward with increased franchise fees and a bonding study.

As the city moves forward with its historic phase out, increased bonding, fees and enforcement mechanisms will be necessary for ensuring the clean up of wells.

Bonding requirements at the city and state level are much lower than the true cost of clean up. While the City has well bonding requirements separate from those required under state law, they are inadequate to protect taxpayers. The City should require significantly higher amounts to reflect the true cost of well abandonment and site remediation. This process should also require operators to submit an estimate of their projected remediation costs in comparison to their current bonding amounts. According to this California Council on Science and Technology (CCST) [report](#), the remediation costs in LA City are much higher than the statewide average, so the City is justified in requiring a higher amount to fully cover true estimates for remediation. The City could also require higher bonding levels for any operator with a history of safety and environmental violations.

In addition to the proposed motion, the City has the legal authority to call on the state to assist in the expedited remediation of idle wells. Specifically, the City can submit requests to CalGEM for a list of idle wells (Cal. Pub. Res. Code § 3206.5(a)) and ask CalGEM to issue remedial orders to require proper plugging and abandonment, especially where current bonding is inadequate.

Bonding requirements and fees as funding mechanisms are already identified in the [2018 LA City Controller report](#), so there is a strong basis for the City to move forward with these recommendations.

Thank you for considering our comments and for your leadership to protect our communities, environment and climate.

Sincerely,

Nicole Levin, Campaigner Beyond Dirty Fuels Campaign, Sierra Club