

November 6, 2021

## Advocates for the Environment

A non-profit public-interest law firm  
and environmental advocacy organization



Los Angeles City Council  
c/o City Clerk  
200 N. Spring Street  
Room 360  
Los Angeles, CA 90012

via U.S. Mail and online submission to [LACouncilComment.com](http://LACouncilComment.com)

re: Proposed franchise agreement with Southern California Gas Company, item #9 on  
November 9, 2021 City Council Agenda, Council File #21-2167

Dear Los Angeles City Council:

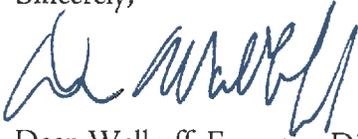
I write to comment on the Proposed franchise agreement with Southern California Gas Company (the **Agreement**), to be considered for approval by the City Council as Item #9 at its meeting on November 9, 2021. I write on behalf of Advocates for the Environment, a non-profit public-interest law firm, and our client, Stop Oil and Gas, a California non-profit corporation that promotes the phase-out of oil and gas production around the world.

Under Government Code § 5956.6(b)(1), the City's execution of the Agreement is not subject to the California Environmental Quality Act (**CEQA**), but that code section requires that the Agreement shall include provisions requiring compliance with CEQA before project development commences. The version of the Agreement in the reports in the Council File do not include such provisions. The City seems to have attached an old version of the City of Los Angeles CEQA Guidelines, adopted July 31, 2002, to the Agreement. But those guidelines are irrelevant because they deal only with exemptions from CEQA, and under Government Code § 5956.6(b)(1), the Agreement is expressly not exempt from CEQA.

The Agreement is a City approval of a Project that will have far-reaching greenhouse-gas (**GHG**) impacts that need to be analyzed under CEQA. Those impacts include facilitation of increases in the use of natural gas, which will, when burned, add significant amounts of GHGs to the atmosphere. The Agreement's facilitation of expansion of Southern California Gas' natural-gas infrastructure, which will result in more methane leaks than there are now, another significant impact. Since the impacts of the project are significant, the City must require all feasible mitigation. Under Gov. Code § 5956.6(b)(1), the Agreement must require Southern California Gas to analyze and mitigate these impacts.

Because the Agreement does not include provisions requiring CEQA compliance, the City's approval of it would violate Gov. Code § 5956.6(b)(1). Please modify the Agreement to include these required provisions before approving it.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dean Wallraff". The signature is fluid and cursive, with a large initial "D" and "W".

Dean Wallraff, Executive Director