



DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

City Planning Commission

Date:	September 22, 2022	Case No.:	CPC-2022-4864-CA; CF No. 17-0447
Time:	After 8:30 A.M.*	CEQA No.:	ENV-2022-4865-MND
Place:	In conformity with the Governor's Executive Order N-29-20 (March 17, 2020) and due to concerns over COVID-19, the CPC meeting will be conducted entirely telephonically by Zoom [https://zoom.us/]. The meeting's telephone number and access code access number will be provided no later than 72 hours before the meeting on the meeting agenda published at https://planning.lacity.org/about/commissionsboards-hearings and/or by contacting cpc@lacity.org	Council No.:	All
		Plan Area:	Citywide
		Applicant:	City of Los Angeles

Public Hearing: August 30, 2022

SUMMARY: An ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to prohibit new oil and gas drilling activities and make existing extraction a nonconforming use in all zones. The proposed Oil and Gas Drilling Ordinance would phase out all oil drilling activities in the City of Los Angeles by immediately banning new oil and gas extraction and requiring the abandonment of existing wells after an amortization period.

RECOMMENDED ACTIONS:

1. **Recommend** that the City Council **Find**, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the Mitigated Negative Declaration, No. ENV-2022-4865-MND ("Mitigated Negative Declaration"), and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect on the environment; **Find** the Mitigated Negative Declaration reflects the independent judgment

and analysis of the City; **Find** the mitigation measures have been made enforceable conditions on the project; and **Adopt** the Mitigated Negative Declaration and the Mitigation Monitoring Program prepared for the Mitigated Negative Declaration;

2. **Approve** and **Recommend** that the City Council adopt the proposed Ordinance;
3. **Recommend** that the City Council instruct that the proposed Ordinance be incorporated into the New Zoning Code, subject to changes to conform to the format and style of the New Zoning Code;
4. **Adopt** the Staff Recommendation Report as the Commission's Report on the subject; and
5. **Adopt** the Findings.

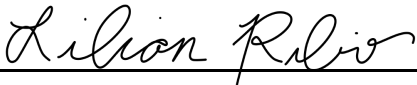
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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communications may be mailed to the Commission Secretariat, 200 North Spring Street, Room 532, Los Angeles, CA 90012 (Phone No. 213-978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent to the week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to this programs, services and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request not later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1300.

TABLE OF CONTENTS

Ordinance Analysis

Summary	A-1
Initiation and Background	A-1
Proposed Ordinance	A-3
Ordinance Revisions	A-5

Public Comments, Discussion, and Recommendation

Public Participation	P-1
Discussion	P-2
Conclusion and Recommendation	P-8

Findings

Land Use Findings	F-1
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Exhibits:

- Exhibit A - Proposed Ordinance (Revised - Dated September 2022)
- Exhibit B - Official Council Action and Instruction
- Exhibit C - Mitigated Negative Declaration (ENV-2022-4865-MND)
and Mitigation Monitoring Program
- Exhibit D - Public Comment

Summary

The proposed citywide Oil and Gas Drilling Ordinance (Ordinance), attached as Exhibit A, was drafted in response to a City Council directive to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones. Upon Council adoption and Mayoral signature, the Ordinance would amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to immediately ban new oil and gas drilling and phase out existing operations after an amortization period.

Initiation and Background

Initiation

On January 26, 2022, City Council instructed the Department of City Planning (DCP), with the assistance of the City Attorney, to prepare and present an ordinance to prohibit new oil and gas extraction and make extraction activities a nonconforming use in all zones (CF 17-0447).

Background

City Council's instructions stem from a long history of oil drilling in Los Angeles and a focus in recent years on providing greater neighborhood protections for communities experiencing the negative health and land use impacts of oil drilling.

Oil drilling started locally in the late 19th century and escalated in the early 1900s. By the 1930s, California was producing nearly one-quarter of the world's oil output, and played a key part in Los Angeles' industrialization and growth over the ensuing decades. Today, Los Angeles is one of the largest urban oil fields in the country, with drill sites and oil wells found in nearly all parts of the City, including, but not limited to, the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando Valley.

While some wells are situated in heavy industrial areas, many are located within residential neighborhoods and amongst community parks and schools. Reports issued by the Los Angeles County Public Health Department and the Board of Public Works' Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) studied and summarized peer reviewed scientific literature on public health and safety risks associated with oil and gas facilities, affirming the body of evidence showing that activities related to oil and gas operations have been associated with many potential negative health and safety impacts, especially when they occur in close proximity to sensitive uses, such as residences, schools, or parks.¹ The Scientific Advisory panel by the California Geologic Energy Management Division (CalGEM) concluded "with a high level of certainty that the epidemiologic evidence indicated that close residential proximity to OGD (Oil and Gas Drilling) is associated with adverse perinatal and respiratory outcomes, for which the

¹ See Council File No 17-0447 – Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019. Report from the Petroleum Administrator to the City Council (Appendices 1 through 4).

body of human health studies is most extensive in California and other location.”² Oil and gas extraction operations also have negative land use effects that can disrupt a community’s livability. These impacts can include, but are not limited to: elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, and lack of effective screening for drill site equipment.

In April 2017, City Council created CF 17-0447 instructing City Departments to examine land use codes related to oil and gas operations in close proximity to sensitive uses in order to prioritize Angelenos’ health and safety, and to keep up with national and statewide efforts to become energy efficient and independent. After several reports and recommendations from City Council’s Energy, Climate Change, and Environmental Justice, Planning and Land Use Management, and Budget and Finance Committees, and in collaboration with the OPNGAS, on January 26, 2022, the City Council directed DCP, with the assistance of the City Attorney, to prepare and present an ordinance to prohibit new oil and gas extraction and make extraction activities a nonconforming use in all zones.

The resulting proposed Oil and Gas Drilling Ordinance is the first step taken by the City to advance an effort to safely phase out oil and gas extraction by prohibiting and making it a nonconforming use. It is an urgent catalyst to a larger citywide effort to phase out oil drilling in Los Angeles, focused narrowly on prohibiting this incompatible land use sooner rather than later.

The proposed Ordinance advances the basic core principle of zoning in Los Angeles to protect citizens’ health, safety, and welfare. This Ordinance is part of a larger effort to address environmental justice and climate change, in tandem with policies found in L.A.’s Green New Deal, Sustainable City pLAn, and the City’s Health, Wellness and Equity Element of the General Plan (“Plan for a Healthy Los Angeles”). Many of these plans and policies encourage reduction in oil usage, generation of green energy, expansion of electrical infrastructure and acknowledgement of environmental justice issues. In addition, building on past efforts, such as Clean Up Green Up (CUGU), which set out to address the overconcentration of pollution in economically underserved communities, such as Boyle Heights, Pacoima, and Wilmington, DCP seeks through this Ordinance to minimize the cumulative health impacts from incompatible land uses. By introducing regulations that would phase out oil activities altogether, the proposed Ordinance is meant to improve the City’s overall livability while addressing long-standing injustices to frontline communities and communities of color disproportionately affected by the health impacts of oil drilling in Los Angeles.

There are many other follow up actions that the City will undertake to ensure the safe phase-out of oil operations citywide and to address the issues that have been raised regarding oil. In addition to this proposed Ordinance, OPNGAS has been tasked with preparing an amortization study to examine the length of time needed for operators their capital investments in oil drilling operations

² “CalGEM Questions for the California Oil and Gas Public Health Rulemaking Scientific Advisory Panel.” The California Geologic Energy Management Division (CalGEM) Scientific Advisory Panel Report. (October 2021)

to determine whether individual oil drilling operations must be terminated sooner than the 20 years currently prescribed in the LAMC. City Council has also instructed OPNGAS, in collaboration with DCP and the Los Angeles Fire Department (LAFD), to develop policies for the timely abandonment and remediation of existing well sites.

Proposed Ordinance

Key Provisions

The recommended Ordinance, dated September 2022, prohibits new oil and gas extraction and makes existing extraction activities a nonconforming use in all zones. Moreover, the recommended Ordinance reflects comments received from the public and further clarifies or corrects language originally presented in the prior draft dated August 2022. Specifically, the recommended Ordinance proposes to amend Sections 12.03, 12.20, 12.24, and 13.01 of the LAMC to:

1. Eliminate the provisions of the LAMC Section 13.01 that allow for the creation of new “O” Oil Drilling Supplemental Use Districts;
2. Prohibit by-right oil and gas extraction in M3-Heavy Industrial Zones;
3. Declare existing oil and gas extraction within the City a nonconforming use; and
4. Prohibit new or expanded oil and gas extraction activities such as the drilling of new wells, the redrilling or deepening of existing wells, or well maintenance activities that could extend the life of a well or intensify its use, except for those activities needed to prevent or respond to a threat to public health, safety, or the environment as determined by the Zoning Administrator.

Scope of Ordinance

The Ordinance does not modify any existing land use plans, and is making limited amendments to the Zoning Code to make oil drilling a nonconforming use. The Ordinance would amend the LAMC to phase out oil drilling in the City by (1) immediately banning new oil and gas extraction and (2) requiring the cessation of all nonconforming oil and gas operations within a 20-year timeframe already prescribed in the Code. The code currently contains a 20-year amortization period for wells to cease operations after they are deemed a nonconforming use. This 20-year timeframe was added to LAMC Section 12.23 C.4 in May 1952 by City Council and is referenced in Ordinance 99,923. As previously mentioned, OPNGAS has been tasked with preparing an amortization study to determine how long existing operators need to recoup their costs and to determine whether individual wells can shut down sooner than 20 years. If the results of the amortization study find that individual wells can recoup their investments sooner, then the Code would be amended to reflect those timeframes.

In accordance with City Council’s directive, the Ordinance is limited to the above-referenced regulations. Once a well ceases operations, it is reasonably foreseeable that the process of abandonment should occur. Although well abandonment and remediation are not directly regulated by the proposed Ordinance, there are existing regulations and procedures from other

local and state enforcement agencies that currently oversee these processes, including the California Geologic Energy Management Division (CalGEM), State and LA Regional Water Quality Control Boards, the South Coast Air Quality Management District (SCAQMD), OPNGAS, and LAFD. In addition to all the applicable federal, state, and local laws and regulations, City Council instructed OPNGAS to develop a citywide policy to ensure proper plugging, abandonment, and site remediation within three to five years of sites ceasing active oil production, with the intention of ensuring oil companies bear the responsibility for abandonment and remediation. OPNGAS is in the process of filling the positions needed to prepare this program.

Applicability

The proposed Ordinance makes all existing oil and gas extraction a nonconforming land use in all zones. The Ordinance is not applicable to (1) common carrier oil pipelines intended for regionally-coordinated transport of hydrocarbons; (2) service stations or like uses; (3) refineries; (4) oil and injection wells that are verified to be plugged and abandoned in accordance with all applicable local, state, and federal laws, rules and regulations, including the California Statutes and Regulations overseen by CalGEM, and LAFD and for which the well pad has been restored suitably for its subsequent use, and (5) any well operated by a public utility regulated by the California Public Utilities Commission (CPUC), including those operating at the Aliso Canyon and Playa Del Rey Gas Storage Fields. The City does not have land use authority over facilities that are governed by the CPUC.

Components

LAMC Section 12.03

Section 12.03 is the Definitions section of the LAMC. The Ordinance proposes to eliminate the definition for Temporary Geological Exploratory Core Hole, as this use would no longer be permitted upon the effective date of the Ordinance.

LAMC Section 12.20

LAMC Section 12.20 regulates uses in the M3 Heavy Industrial Zone. The proposed Ordinance would delete Subdivision 17 of Subsection A of Section 12.20 to no longer allow oil drilling and production as a by-right use in the M3 Zone.

LAMC Section 12.23

Section 12.23 is the Nonconforming Building and Uses section of the LAMC, and includes provisions for oil wells under Subdivision 4 of Subsection C prohibiting any nonconforming well from being re-drilled or deepened, subject to a 20-year sunset period from the time such use became nonconforming. This 20-year phase out period was introduced by the City Council and became effective in May 1952 via Ordinance 99,923. The Ordinance would amend this section of the LAMC to make all oil wells a nonconforming use, including those operating by-right in the M3 zone or pursuant to any discretionary permit in any zone, thereby activating the existing 20-year

phase out regulation. It would amend this section to prohibit any new wells from being drilled citywide and prohibit maintenance, drilling, re-drilling, or deepening on existing wells, except in instances where it is necessary to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator. The Ordinance would also amend LAMC Section 12.23 C.4 to require that any oil use be terminated if it is abandoned or discontinued for a continuous period of six months.

LAMC Section 12.24

LAMC Section 12.24 authorizes Conditional Use Permits. The Ordinance would delete LAMC Sections 12.24 U.18 and 12.24 W.47, which allow the use of onshore installations and temporary geological exploratory core holes through a conditional use permit. These uses would be prohibited entirely upon the effective date of the Ordinance.

LAMC Section 13.01

LAMC Section 13.01 regulates drilling in “O” Oil Drilling Supplemental Use Districts. These provisions enable applicant-initiated zoning overlays for Oil Drilling Districts to be established where the drilling of oil wells or production from the wells of oil, gases or other hydrocarbon substances are permitted. Currently, LAMC Section 13.01 also authorizes requests to initiate modifications of existing entitlements and/or conditions through a discretionary review process before the Zoning Administrator. This section also permits operators to request approval for the drilling of new wells in existing Oil Drilling Districts.

As proposed, the Ordinance would eliminate the provisions of LAMC Section 13.01 that allow for the creation of new Oil Drilling Districts, along with provisions which allow operators to seek discretionary relief to modify existing approvals and conditions and to request for new wells, redrilling, deepening of wells, and well maintenance. The recommended Ordinance retains the Standard and Additional Conditions in Sections 13.01 E and F that apply to established Oil Drilling Districts (with the exception of Offshore Areas, which do not exist in the City), while further clarifying that these conditions remain only to the extent they were incorporated by ordinance through the establishment of an Oil Drilling District, or by reference into previous approvals issued by the Zoning Administrator.

Ordinance Revisions

The recommended Ordinance, dated September 2022, and presented as part of this staff recommendation report as Exhibit A, includes revisions made since the release of the August 2022 draft Ordinance. These revisions clarify or correct language originally presented in the prior draft and reflect comments received from the public.

The revised Ordinance includes additional context on why the City is introducing policies to phase out oil drilling activities in a new recitals section.

The September 2022 version of the Ordinance includes further revisions and clarifying language to LAMC Section 12.23. Most notably, based on public comments received, the revised Ordinance incorporates language to allow for certain types of activities on existing wells that are necessary to prevent or respond to threats to public health, safety, or the environment, as determined by the Zoning Administrator. It also clarifies that the process of well abandonment shall occur upon the conclusion of the 20-year phase out period (or earlier depending on the results of the OPNGAS amortization study) and adds that a well operator shall comply with the mitigation measures and mitigation monitoring program adopted with this Ordinance in the process of plugging and abandoning wells.

Following the release of the draft August 2022 Ordinance, Staff also received comments from stakeholders requesting that the conditions of approval listed in LAMC Sections 13.01 be retained to ensure conditions meant to protect health and safety remain enforceable for existing operators. Conditions under LAMC Sections 13.01 E are established by ordinance through the creation of Oil Drilling Districts, and those under Section 13.01 F are additional conditions imposed at the discretion of City Council or the Zoning Administrator. The intent of the Ordinance has always been to require existing operators to comply with all existing conditions in their discretionary approvals, and for DCP to maintain the authority to initiate proceedings if an operator is not complying with conditions. To make this more explicit, the revised Ordinance, dated September 2022, and presented as part of this staff recommendation report as Exhibit A retains Sections 13.01 E and F of the LAMC, except those conditions pertaining to offshore drilling as this use currently does not exist within City limits and would not be permitted as part of the proposed Ordinance (see **Table 1. LAMC Section 13.01 Proposed Modifications**). The Ordinance would not create new conditions under LAMC Sections 13.01 E or F.

Table 1. LAMC Section 13.01 Proposed Modifications			
Subsection	Description	Ordinance Actions	
		August 2022 Draft	September 2022 Draft
A.	Application for the establishment of Oil Drilling Districts where wells of oil, gases, or other hydrocarbons are permitted	Modify	
B.	Definitions include, but are not limited to “Class I or A” and “Class II or B” wells that distinguish between production and injection wells, respectively.	Modify	
C.	Status of Areas classified as either “Urbanized” or “Non-Urbanized.” Such classifications determine the allowable size of the oil districts and the total drillable land area.	Delete	
D.	Requirements for Filing an application for the establishment of an Oil Drilling District.	Delete	
E.	Standard Conditions for Oil Drilling Districts.	Delete	Retain

F.	Additional Conditions imposed when establishing an oil district (e.g., equipment delivery hours, landscaping and fencing requirements, subsurface production and storage equipment, fire safety precautions, etc.)	Delete	Retain (except Offshore Area conditions)
G.	Description of Districts.	Delete	
H.	Drilling Site Requirements determined by the Zoning Administrator to drill or deepen a well in an Oil Drilling District that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in an M3 zone that is within 500 feet of a more restrictive zone.	Delete	
I.	Permits are required for redrilling, deepening or maintaining oil wells, or converting an oil well from one class to another, and are issued by the Zoning Administrator or Area Planning Commission.	Delete	
J.	Termination of District and how to extend the timeline for that process under the discretion of the Zoning Administrator, the City Petroleum Administrator, and the City Planning Commission.	Delete	
K.	Maintenance of Drilling and Production Site for existing and future oil and gas wells within the City.	Modify	

Existing Operations

Existing operators would be required to abandon their wells after a 20-year amortization period, as provided for under the existing nonconforming use provisions of the Zoning Code. During the amortization period, operators will be prohibited from conducting any activities, including those related to maintenance, drilling, redrilling, or deepening, that could expand their existing operations, intensify their use, or extend the life of a well, except when necessary to prevent or respond to threats to public health, safety, or the environment, as determined by the Zoning Administrator. This exception is consistent with language in new state legislation, as further discussed in the section below (see **Senate Bill 1137**). Moreover, the proposed Ordinance eliminates provisions in LAMC Section 13.01 which allow operators to seek discretionary relief for oil drilling operations as well as requests for new wells, redrilling, deepening, and well maintenance occurring within Oil Drilling Districts. The proposed Ordinance does not include any discretionary process that would allow operators to seek relief from the prohibition on oil drilling.

During the amortization period, oil and gas drilling facilities will be considered legally nonconforming uses and may continue to operate for 20 years, after which all drilling-related activities must cease. This 20-year period is currently in the LAMC, and allows for a period of time for operators to recoup their capital investments in oil drilling activities prior to instituting plans for the decommissioning of existing wells. The proposed Ordinance would be activating this 20-year period upon its effective date. However, as part of a motion related to CF 17-0447, the Mayor and City Council directed OPNGAS to prepare an amortization study. Depending on the results of this study, future code amendments may require some or all wells to shut down sooner, in instances

when the operator may recoup their capital investments prior to the LAMC's current 20-year phase-out period.

Senate Bill 1137

On August 31, 2022, the State Senate passed Senate Bill (SB) 1137, which would prohibit CalGEM from approving a new oil well within 3,200 feet of a "sensitive receptor," defined as a residence, education resource, community resource, healthcare facility, dormitory or any building open to the public. The proposed Ordinance is more restrictive, going beyond SB 1137's prohibition on new wells within a minimum buffer distance, to prohibit new wells and maintenance, drilling, re-drilling, or deepening of existing wells on a citywide basis. Both the City's proposed Ordinance and State law allow for limited exceptions for well activity to occur in instances where it is necessary to prevent or respond to a threat to public health, safety, or the environment. As of the writing of this staff recommendation report, the bill is still awaiting Governor Newsom's signature. This new law, if passed, is not expected to affect the City's efforts. As set forth in the text of SB 1137 itself, *"this article does not prohibit a city, county, or city and county from imposing more stringent regulations, limits, or prohibitions on oil and gas development."*

New Zoning Code

The proposed Ordinance would amend Chapter 1 of the LAMC. Separately, the City Planning Commission in its actions on September 23, 2021 recommended approval of the Downtown Community Plan Update and the proposed Chapter 1A or New Zoning Code. In the event that the City Council adopts Chapter 1A of the LAMC, the proposed Ordinance would be incorporated into the New Zoning Code. The City Planning Commission's action on the Oil and Gas Drilling Ordinance would include recommending that the City Council instruct that the proposed Ordinance be incorporated into the New Zoning Code, subject to changes to conform to the its format and style, making the proposed amendments applicable in the Downtown Plan Area and throughout Chapter 1A of the New Zoning Code.

Environmental Background

A Mitigated Negative Declaration (ENV-2022-4865-MND or MND) and corresponding Mitigation Monitoring Program (MMP) were prepared for the proposed project in compliance with the California Environmental Quality Act (CEQA). The analysis found that potential impacts related to hazards and hazardous materials and noise during the well abandonment process would be reduced to less than significant levels with mitigation. The circulation period for public review is from September 15, 2022 to October 17, 2022, during which time comments on the Initial Study and Mitigated Negative Declaration may be submitted to DCP staff.

The City Planning Commission's action would include recommendation that the City Council: (1) Find, pursuant to CEQA Guidelines Section 15074(b), after consideration of the whole of the administrative record, including the MND, and all comments received, with the imposition of mitigation measures, there is no substantial evidence that the project will have a significant effect

on the environment; (2) Find the MND reflects the independent judgment and analysis of the City; (3) Find the mitigation measures have been made enforceable conditions on the project; and (4) Adopt the MND and the MMP prepared for the Mitigated Negative Declaration.

Public Participation

Upon the draft Ordinance's public release on August 9, 2022, the Ordinance text and a fact sheet were sent to the known interested parties, all certified Neighborhood Councils, and all City Council offices. Staff held meetings and made presentations, including for the STAND-LA Coalition, PlanCheckNC, and oil operators, to gather feedback from key stakeholders, both during the preparation of the draft Ordinance and after its public release. Staff also gathered input and written correspondence from individuals and organizations expressing interest in the Ordinance.

Hearing

A bilingual staff-level public hearing for the proposed Oil and Gas Drilling Ordinance was held virtually the evening of August 30, 2022. The purpose of the hearing was to receive public testimony on behalf of the City Planning Commission as the recommending body to City Council.

The hearing was attended by approximately 162 members of the public, of which 39 provided public testimony.

Public Testimony

34 members of the public, which included nearby residents to oil drill sites and environmental justice community groups, expressed support for the proposed Ordinance, and recognized the Ordinance as a step in the right direction. However, these 34 speakers also requested the proposed Ordinance to be strengthened by addressing the following concerns:

- The 20-year proposal for the amortization period is too long and should be shortened.
- The Ordinance should keep the existing regulatory mechanisms within LAMC Section 13.01 to protect health and safety.
- The Ordinance should ban acidization and any other maintenance activities that threaten health or extend the life of wells.
- The City should require clean up and remediation to be completed within a five-year time frame and paid for by oil companies.
- The City should engage with the local community when considering rezoning for future development of former drill sites.

5 members of the public, which included a resident, an environmental chemist, members of petroleum associations, and business advocates indicated that:

- The Ordinance amounts to a taking and the 20-year amortization period is not reasonable.
- The Ordinance would have negative economic impacts, including on jobs, mineral rights, and taxpayer revenue.
- There is no scientific evidence that oil drilling results in health impacts.
- The Ordinance would increase dependence on foreign oil and exacerbate pollution in ports.

Additional Correspondence

As of September 2, 2022, DCP received 260 written comments from individuals residing near oil drill sites, community groups, and business advocates, echoing the concerns raised at the public hearing. In addition, STAND-LA submitted a letter on September 2, 2022 providing the following feedback on the Ordinance, stating:

1. We strongly support a final Oil and Gas Ordinance that declares oil wells in all zones a nonconforming use;
2. The draft Oil and Gas Ordinance should maintain key health and safety standards;
3. LA City must strengthen requirements for robust and swift remediation at oil drilling sites;
4. LA City must prohibit harmful well maintenance including acid treatments; and
5. LA City should explain the process of amending the 20-year default amortization period following completion of the amortization study.

Discussion

Concerns raised at the public hearing and in public correspondence are summarized and responded to below.

Amortization Period

Staff received comments about the 20-year amortization period that would be activated through the Ordinance from both proponents and opponents. Supporters of the Ordinance expressed concern that the 20-year phase out period is too long and that the citywide ban on oil drilling should occur sooner. This 20-year period is currently in the LAMC and has existed as a regulation for 70 years, since 1952. The initial intent of this regulation was to allow for a period of time for operators to recoup their capital investments in oil drilling activities prior to instituting plans for the decommissioning of existing wells. In order to evaluate whether or not this 20-year period is the appropriate time frame, the Mayor and City Council, as part of CF 17-0447, directed OPNGAS to prepare an amortization study to determine whether this existing amortization period should be amended. The City is in the process of securing a consultant to prepare the study. Depending on the results of this study, future code amendments may require some or all wells to shut down sooner, in instances when the operator may recoup their capital investments prior to the 20-year amortization period currently embedded in the Zoning Code. The specific approach the amortization study will take is still to be determined, and as such, the timing and composition of future ordinances to shorten the amortization period on individual wells is uncertain. Nonetheless, DCP and OPNGAS coordinate closely on oil-related matters and will continue to do so concerning future code amendments relating to amortization.

Individuals opposing the Ordinance stated that oil fields can produce for much longer than 20 years, and that amortization fails as a substitute for compensation for oil and gas rights. As mentioned, the purpose of the amortization period is to allow operators a period of time to recoup their capital investments in oil drilling activities; it is not to maximize the productivity of a well. Therefore, the potential lifespan of an oil field is not directly related to the amortization period.

Prohibiting Well Maintenance

Proponents of the Ordinance stated that it rightfully prohibits maintenance activities that have been a known detriment to public health and safety. These individuals requested that well maintenance be prohibited under the Ordinance, including activities related to acidization. STAND-LA requested in their September 2, 2022 letter to specifically list acid treatment as among the maintenance activities that will be prohibited once the Ordinance goes into effect. As detailed below, maintenance activities would be prohibited under the proposed Ordinance, except when necessary to prevent or respond to threats to public health, safety, or the environment.

Separately from this Ordinance, DCP's Office of Zoning Administration is preparing a Zoning Administrator's Interpretation on the types of oil-related activities that constitute maintenance. The definition of maintenance is being addressed separately from the Ordinance because of the present need to clarify that maintenance activities, including acidization, are within the oversight of the Zoning Administrator. Once final, this guidance would immediately apply to all oil drilling activities. It would further clarify the types of maintenance activities prohibited under the Ordinance, with limited exceptions to prevent or respond to threats to public health, safety, or the environment. Generally, activities that require a Notice of Intention from CalGEM would be considered maintenance, including, but are not limited to: redrilling work such as sidetracking, rework activities such as recasing and liner replacement. In addition, acidizing operations would qualify as well maintenance.

Operators would still be allowed to perform servicing to equipment associated with the oil and gas wells such as pipelines, storage tanks, production equipment, foundation pads, and similar structures and equipment. Well servicing, as well as work activities that replace parts of the well that do not permanently alter the well casing or wellbore diagram, would be permitted, and would not qualify as "well maintenance."

Oil operators shared concern that a ban on maintenance activities would prevent necessary work from occurring to ensure safe operations during the legally nonconforming period, which could lead to unintended effects. City Council's motion directed DCP to prepare an ordinance that phases out all oil drilling activities in the City. In response, the proposed Ordinance prohibits any activities that could extend the life of a well or intensify its use, including those activities related to maintenance. However, there may be a limited set of circumstances where maintenance activities are necessary to prevent or respond to a threat to public health, safety, or the environment. As such, the September 2022 draft of the proposed Ordinance incorporates language permitting maintenance activities under limited circumstances, as determined by the Zoning Administrator.

Subsidence, which is the sinking or gradual lowering of the earth's surface, is one such example. There is documented evidence of subsidence at the Wilmington Oil Field, one of the 26 oil fields within the City, which also underlies the City of Long Beach. Oil or gas withdrawal subsidence has taken place extensively in the Long Beach Harbor area. At the center of the basin, subsidence amounted to as much as 30 feet at one time. To correct this problem, a full-scale water injection

operation was initiated in 1958. Extensive repressurization of the reservoir through water injection has stabilized the area, which, along with substantial remedial landfill operations, has allowed continued use of port, petroleum production and commercial facilities. The Ordinance recognizes that public health, safety, and environmental concerns such as these, may in instances require otherwise prohibited activities to occur at the discretion of the Zoning Administrator. Concurrent with the effective date of the Ordinance, the Office of Zoning Administration will issue a memorandum to detail the review process and procedures for those activities which are necessary to respond to threats to public health, safety, and the environment. While it is recognized that there may be rare instances of emergency or imminent threat that the Zoning Administrator must respond to immediately through a ministerial review process, most other requests would involve a public process with discretionary review to ensure that the activity is necessary to maintain public health, safety, and the environment.

Elimination of Regulations

At the public hearing, members of the public raised concerns about the elimination of existing regulations to protect health and safety from LAMC Section 13.01. The intent of the Ordinance has always been to require existing operators to comply with all existing conditions in their discretionary approvals, and to maintain the authority to initiate proceedings if an operator is not complying with conditions. Conditions under LAMC Sections 13.01 E are established by ordinance through the creation of Oil Drilling Districts, and those under Section 13.01 F are additional conditions imposed at the discretion of City Council or the Zoning Administrator. The revised Ordinance, dated September 2022, and presented as part of this staff recommendation report as Exhibit A, retains Sections 13.01 E and F of the LAMC, which include Standard and Additional Conditions for Oil Drilling Districts, such as equipment delivery hours, landscaping and fencing requirements, subsurface production and storage equipment, and fire safety precautions, among other protective measures. The Ordinance further clarifies that these conditions remain only to the extent they were incorporated by ordinance through the establishment of an Oil Drilling District, or by reference into previous approvals issued by the Zoning Administrator, so as not to apply to the establishment of new Oil Drilling Districts. The proposed Ordinance does not introduce new conditions, however, it does eliminate conditions pertaining to offshore drilling, which currently does not exist within City limits and would not be permitted as part of this effort.

Advocates of the Ordinance sought for LAMC Sections 13.01 H and I to be retained, interpreting these sections as the basis for DCP and the Zoning Administrator's authority to permit drilling operations and prescribe mandatory conditions on operators to maintain baseline safeguards at oil facilities before oil production is phased out and all drill sites are properly cleaned and remediated. Although the Ordinance deletes the provisions in 13.01 H and I from the Zoning Code, oil wells approved to operate under the authority of LAMC Section 13.01 are still bound to any and all conditions imposed in prior approvals through a letter of determination, and the Zoning Administrator maintains authority to impose additional conditions or require corrective measures through a discretionary process under the provisions of LAMC Section 13.01 E. Keeping LAMC Sections 13.01 H and I would appear on its face to allow operators to seek new permits to drill, deepen or maintain an oil well under the oil process. As mentioned above, LAMC Sections E and

F have been amended to clarify that the Standard and Additional Conditions embedded within those sections remain applicable to previously established Oil Drilling Districts and/or prior approvals to conduct drilling activity. Further, the Zoning Administrator maintains their authority to impose additional conditions or require corrective measures under the provisions of LAMC Section 13.01 E, existing conditions in prior approvals³, and through the nuisance provisions set forth in LAMC Section 12.27.1. The intent of the Ordinance is to prohibit any intensification or expansion of oil drilling uses, and as such, does not provide a discretionary process to allow operators to seek relief for new wells, the redrilling or deepening of existing wells, or well maintenance activities, except when necessary to curb threats to public health, safety, or the environment as prescribed in the Ordinance's amendments to LAMC Section 12.23.

Site Cleanup and Remediation

Numerous public commenters called for the City to develop a policy requiring site remediation within a five-year time frame of the cessation of oil drilling operations. In addition, STAND-LA's September 2, 2022 letter calls for the Ordinance itself to address a timeframe for cleanup and remediation, along with requirements for soil contamination testing and site restoration to as near a natural state as practicable, citing the Cities of Culver City and Santa Barbara as examples where oil phase-out and remediation requirements have been combined in one ordinance. STAND-LA also supports a City program to encourage operators to initiate plugging and remediation simultaneously with phase-out activities.

The Ordinance addresses soil contamination through a required environmental mitigation measure meant to ensure that well plugging and abandonment activities will not exacerbate existing hazardous materials either on well sites or within close proximity to hazardous materials sites compiled pursuant to Government Code Section 65962.5, commonly known as the Cortese List. To assess the potential for soil contamination, the mitigation measure would require prior to abandonment, the well owner to review the Cortese List to determine if the subject well is on the list. If it is found that the subject well (or grouping of wells) is on the list, a Phase I Environmental Site Assessment (ESA) would be required to be conducted to determine the level of contamination. Compliance with recommendations in the Phase I ESA would reduce potential impacts of soil contamination.

³ An example of such a condition can be found in Case No. ZA 15227(O)(PA4) (Murphy Drill site):

14. At any time during the period of validity of this grant, should documented evidence be submitted showing continued violation of any condition of this grant, resulting in an unreasonable level of disruption or interference with the peaceful enjoyment of the adjoining and neighboring properties, the Zoning Administrator reserves the right to require the applicant to file for a plan approval application together with associated fees pursuant to LAMC Section 19.01-C (Plan Approval 12.24-M \$1,898 or as in effect at the time of filing), the purpose of which will be to hold a public hearing to review the applicant's compliance with and the effectiveness of these conditions. The applicant shall prepare a radius map and cause a notification to be mailed to all owners and occupants of properties within a 500-foot radius of the property, the Council Office, and the Los Angeles Police Department corresponding Division. The applicant shall also submit a summary and any supporting documentation of how compliance with each condition of this grant has been attained. Upon this review the Zoning Administrator may modify, add or delete conditions, and reserves the right to conduct this.

Although the Ordinance does not directly regulate remediation outside of this mitigation measure, it represents the first step taken by the City to advance an effort to safely phase out oil and gas extraction by prohibiting and making it a nonconforming use. It is an urgent catalyst to a larger citywide effort to phase out oil drilling in Los Angeles, focused narrowly on prohibiting this incompatible land use sooner rather than later. DCP recognizes that a cleanup and remediation policy needs to be addressed on a citywide basis. In addition to this proposed Ordinance, City Council has also instructed OPNGAS to develop policies for the timely abandonment and remediation of existing well sites within three to five years of sites ceasing active oil production, with the intention of ensuring oil companies bear the responsibility for abandonment and remediation. OPNGAS is in the process of filling the positions needed to prepare this program. While the adoption of the Ordinance would accomplish a significant milestone in initiating the phase-out period, DCP will continue to consult with OPNGAS to conduct the necessary research on site cleanup and remediation policies, leaving open the possibility of future regulatory changes to the Zoning Code, if appropriate.

While future City policies on abandonment and remediation are developed, well operators continue to be held to existing regulations and procedures from other local and State agencies and City departments that enforce these processes. CalGEM administers regulations and procedures pertaining to all oil and gas wells on public and private land and offshore and oversees the approval process to permanently plug and abandon wells to ensure that public health, safety, and natural habitats are protected. CalGEM also seeks out responsible parties when an abandoned well is orphaned with no solvent operator to attempt to hold oil companies responsible for the cost of clean-up activities. The State and LA Regional Water Quality Control Boards oversee the location and the type of fluids involved as well as the soil clean up process and review soil data and assess the level of contamination as required by all applicable federal, state, and local laws and regulations. SCAQMD ensures that the demolition process at drill sites does not pollute the air. OPNGAS provides citywide technical advice on all matters related to the City's legacy petroleum contracts and future site remediation. LAFD's Certified Unified Program Agency provides oversight over hazardous materials stored, used, or handled on active drill sites. The LAFD Oil Wells Unit regulates inspection around fire and life safety and reviews abandonment applications.

Future Development

Stakeholders urged the City to engage with the local community when considering rezoning for future development of former drill sites. The Ordinance does not modify any existing land use plans, and is making limited amendments to the Zoning Code to make oil drilling a nonconforming use. Any rezoning for future development of former drill sites would require legislative action, community engagement, and opportunities for public comment as part of that future rezoning process. Given the LAMC's current 20-year phase out period, future development would be difficult to anticipate in the scope of this ordinance given the myriad changes to land use patterns that could occur over this span. However, if the City's amortization study documents that some or all well operators have recouped their capital investments sooner than 20 years, future code

amendments may require some or all wells to shut down sooner. With a more specific timeline, DCP would have more information to consider changes to zoning to facilitate development on former well and drill sites through updates to Community Plans and other targeted, neighborhood-based land use initiatives. These processes involve many forms of outreach and stakeholder engagement to ensure that plans are developed to reflect the needs of communities.

Loss of Royalty Income by Mineral Rights Owners

Individuals at the public hearing and in written correspondence expressed concern that the proposed citywide ban on oil drilling would adversely affect mineral and royalty owners. The mineral right owner does not own oil until it is extracted, which requires the owner to contract with an operator to obtain multiple permits (some of which could be discretionary) and a capital investment by the operator to extract the oil. The value of those rights is speculative. As for mineral rights holders who are currently receiving royalties from oil production, the reasonable amortization period—one sufficient to allow owners and operators to recover their investments—mitigates economic damages and reduces interference with owners' and operators' reasonable investment-backed expectations.

Economic Impacts

Concerns were raised that the phase out of local oil and gas production would result in adverse economic impacts, including higher gas prices, further dependence on foreign oil, and the elimination of jobs.

It is speculative to state that the Ordinance's end to oil and gas production citywide would lead to higher gas prices and further dependence on foreign oil. A 2017 report concluded that the elimination of oil and gas extraction capacity would not have a significant impact on local energy prices, though it may cause some employment loss in local parts of the oil and gas transportation system associated with well closures.⁴

To mitigate potential job losses, the County of Los Angeles's Board of Supervisors initiated a working group, the Just Transition Task Force, that involves numerous County, City, and State agency staff. This task force also includes participation from drill site operating companies, unions, and environmental justice advocates to address economic impact concerns, including the effect on industry jobs at operating drill sites. Members of DCP participate in the task force and continue to engage in conversations on this topic alongside other City departments and local agencies.

The annual cumulative oil production in 2017 in the City was equivalent to 2.5 million barrels of oil, or two percent of the state's total production. The loss of these resources would not be substantial at the state level. Further, both California and Los Angeles have, in recent years,

⁴ "The Oil and Gas Extraction Sector in the City of Los Angeles," by David Rigby, Ph.D. and Michael Shin, Ph.D. and Geografio LLC (2017)

adopted and/or implemented regulations, policies and initiatives that clearly indicate both the City and the state are moving away from petroleum dependence. These include:

- In 2018, California mandated that new single-family homes, as well as multi-family dwellings up to three stories high, must include solar panels starting in 2020. A second mandate was also voted into law, requiring new commercial buildings to have solar panels and battery storage as well.⁵
- California plans to ban the sale of new gasoline powered cars by 2035.⁶
- Los Angeles City Council unanimously voted in May 2022 to ban gas stoves in new Los Angeles buildings and require only electric stoves and ovens.⁷
- Los Angeles Green New Deal proposes:⁸
 - LADWP will supply 55% renewable energy by 2025; 80% by 2036; and 100% by 2045.
 - All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050.
 - To increase the percentage of zero emission vehicles in the city to 25% by 2025, 80% by 2035, and 100% by 2050.
 - To electrify 100% of Metro and LADOT buses by 2030.
 - To reduce port-related GHG emissions by 80% by 2050.
 - To improve the raw scores of CalEnviroScreen indicators of L.A. communities in the top 10% by an average of 25% by 2025 and 50% by 2035.
 - To reduce the number of annual childhood asthma-related emergency room visits in most contaminated neighborhoods to less than 14 per 1,000 children by 2025 and 8 per 1,000 children by 2035

Each of these policies signal a long-term shift away from petroleum and natural gas resources to renewables and electricity. Further, more recent plans prepared by the City, such as the Air Quality Element, Safety Element, Conservation Element, Health, Wellness and Equity Element (Plan for a Healthy Los Angeles), and the Land Use Element (West Adams-Baldwin Hills-Leimert Community Plan, Harbor Gateway Community Plan, and Wilmington Harbor City Community Plan), all include policies geared toward reducing reliance on petroleum and natural gas.

Conclusion and Recommendation

The proposed Ordinance would phase out all oil drilling activities in the City by immediately banning new oil and gas extraction and requiring the removal of existing operations after an amortization period. While this Ordinance will not stop all operations immediately, existing extraction would no longer be permitted to intensify or expand, and new wells and drill sites would

⁵ “Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation”. State of California Governor’s Office of Planning and Research, California Energy Commission (2018)

⁶ Advanced Clean Cars II Regulations Resolution 22-12. State of California Air Resources Board (2022)

⁷ See Council File No. 22-0151 - relative to a plan for the implementation of an Ordinance and/or regulatory framework that will require all new residential and commercial buildings in Los Angeles to be built so that they will achieve zero-carbon emissions. (May 2022)

⁸ City of Los Angeles Green New Deal Plan. Sustainability Plan (2019)

be prohibited from being established. Given the history of health risks associated with oil and gas operations, the City is advancing a phase-out of oil and gas drilling to address long-standing injustices to frontline communities who have been disproportionately affected from the adverse health impacts. In addition, the City is responding to public concerns demanding action against oil extraction by proposing an ordinance that would prohibit its use. This Ordinance adds to the list of the City's efforts to address environmental justice and climate change as well as to improve land use compatibility. There will be future work done by the City to address the many issues that have been raised regarding oil drilling, but this Ordinance is an important initial step toward the ultimate goal of ensuring the safe phase-out of oil and gas extraction activities in the City. As such, Staff recommends the adoption of the proposed Ordinance that would amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the LAMC in order to establish provisions and procedures to prohibit new oil and gas drilling activities and make existing extraction a nonconforming use in all zones.

Land Use Findings

1. **Charter Finding 556 (General Plan).** In accordance with City Charter Section 556, the proposed Oil and Gas Drilling Ordinance (Ordinance) is in substantial conformance with the purposes, intent, and provisions of the General Plan.

This Ordinance is part of a larger effort to address environmental justice and climate change, in tandem with policies found in the City's Health, Wellness and Equity Element of the General Plan (Plan for a Healthy Los Angeles, or Health Element). Many of these plans and policies encourage reduction in oil usage, generation of green energy, expansion of electrical infrastructure and include acknowledgement of environmental justice issues. The Ordinance seeks to minimize the cumulative health impacts from incompatible land uses associated with oil drilling. By introducing regulations that would phase out oil activities altogether, the proposed Ordinance is meant to improve the City's overall livability while addressing long-standing injustices to frontline communities and communities of color disproportionately affected by the health impacts of oil drilling in Los Angeles, as prioritized in various elements of the General Plan.

The proposed Ordinance furthers the following objectives and policies of the General Plan:

Air Quality Element
4.1.1 Coordinate with all appropriate regional agencies the implementation of strategies for the integration of land use, transportation, and air quality policies.
5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.
5.3.1 Support the development and use of equipment powered by electric or low-emitting fuels.
Safety Element
1.1.4 Health/Environmental Protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.
1.2.1 Environmental Justice. In keeping with the Plan for a Healthy LA, build a fair, just and prosperous city where everyone experiences the benefits of a sustainable future by correcting the long running disproportionate impact of environmental burdens faced by low income families and communities of color.
1.2.12 Prosperity and Green Jobs. Leverage investments in green infrastructure and systems to create inclusive economic opportunities for the

city's workforce.
1.2.2 Renewable Energy. Aggressively pursue renewable energy sources, transitioning away from fossil-based sources of energy and toward 100% renewable energy sources.
1.2.7 Zero Emissions Vehicles. In keeping with the Mobility Plan, work toward zero emissions transportation and goods movement and increase zero emissions infrastructure including charging.
1.2.8 Industrial Emissions and Air Quality Monitoring. In keeping with the Air Quality Element, ensure that every Angeleno can breathe clean, healthy air by addressing air pollution from all sources, with a particular emphasis on prioritizing the health and wellbeing of overburdened families and delivering environmental justice.
Program # 6 Identify, Analyze, and Mitigate Local Oil and Gas Risks.
Conservation Element
Policy 1: continue to encourage energy conservation and petroleum product reuse.
Policy 2: continue to support state and federal bans on drilling in the Santa Monica Bay and on new drilling along the California coast in order to protect the San Pedro and Santa Monica bays from potential spills associated with drilling, extraction and transport operations.
Policy 3: continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements.
Health, Wellness and Equity Element (Plan for a Healthy Los Angeles)
5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
5.2 Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.
Land Use Element – West Adams-Baldwin Hills-Leimert Community Plan

CF20-5 Reduce Greenhouse Gas Emissions. Support efforts to promote the use of clean, renewable energy that is diverse in technology and location to decrease dependence on fossil fuels, reduce emissions of greenhouse gases, and increase the reliability of the power supply. (P143)
LU65-2 Capitalize on Emerging Industrial Sectors Capitalize on rehabilitation and adaptive reuse of existing structures, as well as the introduction of contextual new infill construction in areas such as the Hyde Park Industrial Corridor. Provide land use incentives and standards that facilitate the generation of high wage jobs and training for the community especially within the growing “clean- tech” and “greentech” sectors. (P13, P33, P286)
LU75-1 Discretionary Review. Seek a high level of discretionary review for any changes to, or expansion of, existing oil extraction sites and activities so that the public may remain informed and involved, and so that appropriate environmental review may take place pursuant to the California Environmental Quality Act.
LU75-2 Periodic Review. Encourage regular and periodic discretionary review of any extraction activities involving hazardous materials.
LU75-3 Community Health. Recommend that any extraction technology, including fracking, acidizing, or other technologies that involve potentially hazardous materials, has no negative impacts on public or environmental health. Support comprehensive plans, which strive to stop the release of chemicals from extraction sites into the groundwater or the surrounding environment.
LU75-5 Hazardous Materials. Recommend that any decisions to approve the transportation or use of hazardous materials are based on sound understanding of potential public health impacts, and that adequate study and analysis has been conducted and demonstrated as part of the decision-making record.
LU75-6 Mitigation of Impacts. Encourage adequate mitigation of noise, odor, glare, vibration, and aesthetic impacts. Support efforts to discourage continuous around-the-clock drilling.
M12-3 Priority Parking for Alternative Fuel Vehicles. Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels. (P209)
M12-4 Connections for Electric Vehicles. Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles and plug-in electric hybrids. (P109)
Land Use Element - Harbor Gateway Community Plan
Oil wells should be landscaped and maintained in an attractive condition, especially where adjacent to residential uses.

Improved bus service should be provided to more directly connect the various commercial, residential and industrial areas of this and adjacent communities.
Land Use Element - Wilmington Harbor City Community Plan
1-2.1 Locate higher residential densities near commercial centers and major transit routes, where public service facilities, utilities, and topography will accommodate this development.
1-6.1 The enlargement of nonconforming, incompatible commercial and industrial uses within areas designated on the Plan map for residential land use shall be prohibited, and action shall be taken toward their removal on a scheduled basis in conformance with Section 12.23 of the Municipal Code.
3-5.1 Regulate oil extraction activities and facilities in such a manner to enhance their compatibility with the surrounding community.
3-5.3 Require, after January 1, 2000, that all drilling sites and oil production activities comply with the rules and regulations pertaining to urbanized areas. Alternatively, in the case of drilling sites and other oil production activities within a previously established drilling district, such sites and activities shall comply by January 1, 2000 with an Ordinance to be initiated which will (a) govern the maintenance and landscaping of drilling sites and other oil production activities; and (b) provide a program for the abandonment of drilling sites that no longer serve a useful function.
3-5.4 Seek the consolidation of surface oil extraction operations to free land for other uses, where feasible, to increase compatibility between oil operations and other land uses.
Objective 10-1 To encourage improved local and express bus service through the Wilmington Harbor City community, and encourage park-and-ride facilities to interface with freeways, high occupancy vehicle (HOV) facilities, and transit routes.
Objective 11-1 To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips.

The General Plan establishes growth and development policies by providing a comprehensive long-range view of the City as a whole. Although the Conservation Element provides a map of the various oil fields in the City and discusses petroleum as a resource, the City does not consider petroleum to be a mineral resource of local importance and considers activities associated with its extraction to be detrimental to public health and safety and the environment. This is reflected in recent City policies such as the Green New Deal, Clean Up Green Up (Los Angeles Municipal Code Section 13.18; effective June 2016), and in policies included in the updates to the Health and Safety elements of the City's General Plan adopted on November 24, 2021, including

Health Element policy 5.4 and Safety Element policies 1.2.2 and 1.2.7. Furthermore, this Ordinance is consistent with Conservation Element, Section 19 policies 1 and 3 to “encourage conservation of petroleum,” and to “protect neighborhoods from potential accidents and subsidence associated with [petroleum] drilling, extraction and transport operations...”

In addition, as shown above, the Ordinance is consistent with the City’s goals and policies that call for a transition away from oil and gas uses. The City has adopted numerous policies over the last 20 years that encourage either increased management of or termination of oil drilling, including West Adams-Baldwin Hills-Leimert Community Plan Policy LU 75-1, Conservation Element Policy 2, and Safety Element 1.2.1. The Ordinance is consistent with these policies as it would require the termination of oil and gas extraction in the City. Each of these policies signal a long-term shift away from petroleum and natural gas resources to renewables and electricity.

As shown in the table above, the vast number of these policies recognize the negative health and safety implications of locating oil wells in proximity to residential uses. The Ordinance will help further the goals of the Health Element, as it seeks to protect community health and wellbeing from exposure to noxious activities that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapor and others.

For the reasons stated above, the proposed Ordinance is in substantial conformance with the purposes, intent, and provisions of the General Plan.

2. **City Charter Finding 558 and LAMC Section 12.32 (Public Necessity, Convenience, General Welfare, Good Zoning Practice).** In accordance with City Charter Section 558 (b)(2) and LAMC Section 12.32 C.7, the proposed Ordinance will be in conformance with public necessity, convenience, general welfare, and good zoning practice by advancing the basic core principle of zoning to protect citizens’ health, safety, and welfare.

Oil drilling started locally in the late 19th century and escalated in the early 1900s. By the 1930s, California was producing nearly one-quarter of the world’s oil output, and played a key part in Los Angeles’ industrialization and growth over the ensuing decades. Today, Los Angeles is one of the largest urban oil fields in the country, with drill sites and oil wells found in nearly all parts of the City, including, but not limited to, the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando Valley.

While some wells are situated in heavy industrial areas, many are located within residential neighborhoods and amongst community parks and schools. Studies have shown that activities related to oil and gas operations have been associated with many potential negative health and safety impacts, especially when they occur in close proximity

to sensitive uses, such as residences, schools, or parks.¹ Oil and gas extraction operations also have negative land use effects that can disrupt a community's livability. These impacts can include, but are not limited to: elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, and lack of effective screening for drill site equipment.

The need to prioritize Angelenos' health and safety, and keep up with national and statewide efforts to become energy efficient and independent have been adopted in recent City policies and ordinances. The Ordinance is part of a larger effort to address environmental justice and climate change, in tandem with policies found in L.A.'s Green New Deal, Sustainable City pLAn, and the City's Health Element. Many of these plans and policies encourage reduction in oil usage, generation of green energy, expansion of electrical infrastructure and acknowledgement of environmental justice issues. In addition, building on past efforts, such as Clean Up Green Up (CUGU), which set out to address the overconcentration of pollution in economically underserved communities, such as Boyle Heights, Pacoima, and Wilmington, the Ordinance is aimed at minimizing the cumulative health impacts from the incompatible land uses associated with oil drilling.

By introducing regulations that would phase out oil activities altogether, the proposed Ordinance is meant to improve the City's overall livability while addressing long-standing injustices to frontline communities and communities of color disproportionately affected by the health impacts of oil drilling in Los Angeles. For these reasons, the Ordinance will be in conformance with public necessity, convenience, general welfare, and good zoning practice.

3. **Environmental Finding.** The City of Los Angeles, as the Lead Agency, prepared a Mitigated Negative Declaration (MND), Case No. ENV-2022-4865-MND, for the proposed Ordinance. The proposed Ordinance would prohibit the redrilling of existing oil wells and the drilling of new oil wells throughout the City. It would also declare all existing oil wells a nonconforming use that would be amortized within a 20-year timeframe. In consideration of the whole administrative record and all comments received regarding the MND and the proposed Ordinance, the City Planning Commission shall recommend the City Council to adopt the MND pursuant to CEQA Guidelines Section 15074(b). Additionally, with the imposition of mitigation measures, the City Planning Commission shall recommend the City Council to find that there is no substantial evidence that the project will have a significant effect on the environment; find that the MND reflects the independent judgment and analysis of the City; find the mitigation measures have been made enforceable conditions on the project; and adopt the MND and the Mitigation Monitoring Program prepared for the MND.

¹ See Council File No 17-0447 – Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019. Report from the Petroleum Administrator to the City Council (summary of health studies).

EXHIBIT A

Proposed Ordinance (Revised - Dated September 2022)

ORDINANCE NO. _____

An ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) in order to establish provisions and procedures to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones.

WHEREAS, activities related to oil and gas extraction operations have been associated with many potential health and safety impacts, especially when they occur in close proximity to sensitive uses such as homes, schools, places of worship, recreation areas, and healthcare facilities;

WHEREAS, historical injustices have been incurred upon frontline communities and communities of color from exposure to known public health and safety hazards of oil drilling;

WHEREAS, activities related to oil and gas extraction operations have a negative effect on surrounding communities that include land use impacts such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, and traffic congestion on local streets and lack of effective screening for drill site equipment;

WHEREAS, a priority has been placed on the national, statewide, and local levels to become energy efficient and independent;

WHEREAS, the City is prioritizing policies addressing climate change and increased awareness of environmental justice to promote equity and clean air for all neighborhoods;

WHEREAS, a core principle of zoning in Los Angeles is to protect citizens' health, safety, and welfare;

WHEREAS, though the Conservation Element provides a map of the various oil fields in the City and discusses petroleum as a resource, the City does not consider petroleum to be a mineral resource of local importance and considers the activities associated with its extraction to be detrimental to public, health and safety and the environment.

WHEREAS, this is reflected in recent City initiatives and ordinances such as the Green New Deal, Clean Up Green Up (LAMC 13.18 eff. June, 2016) and in policies included in the updates to the Health and Safety elements of the City's General Plan adopted on November 24, 2021, including Health Element policy 5.4 and Safety Element policies 1.2.2 and 1.2.7.

WHEREAS, furthermore, this Ordinance is consistent with Conservation Element, Section 19 policies 1 and 3 to "encourage conservation of petroleum," and to "protect

neighborhoods from potential accidents and subsidence associated with [petroleum] drilling, extraction and transport operations....”

WHEREAS, although oil production was a defining feature of Los’ Angeles’ early development, the need to improve the City’s overall livability takes priority.

**THE PEOPLE OF THE CITY OF LOS ANGELES
DO ORDAIN AS FOLLOWS:**

Section 1. A definition is deleted from Section 12.03 of the LAMC as follows:

~~**TEMPORARY GEOLOGICAL EXPLORATORY CORE HOLE.** A seismic test hole or exploratory core hole used or intended to be used exclusively for geophysical, geological, and other exploratory testing for oil, natural gas or other hydrocarbon substances. (Amended by Ord. No. 152,744, Eff. 9/10/79.)~~

Section 2. Subdivision 17 of Subsection A of Section 12.20 of the LAMC is deleted in its entirety.

~~17. **(None)** Oil drilling and production of oil, gas or hydrocarbons, except that oil drilling and production of oil, gas and hydrocarbons within 500 feet of a more restrictive zone shall be subject to the provisions of Subsection A and H of Section 13.01 of this article.~~

Section 3. Subdivision 4 of Subsection C of Section 12.23 of the LAMC is amended as follows:

C. Nonconforming Use Of Land

4. Oil Wells.

(a) All oil wells (as defined pursuant to LAMC Section 13.01 B), including those operating pursuant to any discretionary permit in all zones, whether by ordinance or approval of a Zoning Administrator, and all oil wells in an M3 Zone, are nonconforming uses as of the effective date of the ordinance. No new well for the production of oil, gas or other hydrocarbon substances may be drilled in any zone. No existing well for the production of oil, gas or other hydrocarbon substances, which is a nonconforming use, shall be maintained, drilled, re-drilled, or deepened, **except to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator.**

(b) **The operation of a** All such wells, including any incidental storage tanks and drilling or production equipment, shall **cease** be completely removed

~~within 20 years from June 1, 1946, or within 20 years from the effective date of the ordinance deeming such uses became nonconforming, if said date was subsequent to June 1, 1946; provided, however, a Zoning Administrator may, upon individual application, allow such wells to continue to operate after said removal date, if he determines that such continued operation would be reasonably compatible with the surrounding area and in connection therewith may impose such conditions, including time limitations, as he deems necessary to achieve such compatibility.~~

- (c) ~~(None) Notwithstanding the above, in the Los Angeles City Oil Field such wells may continue operation provided an application is filed with the Office of Zoning Administration on or before November 1, 1986 and is subsequently approved. Any well operator may reapply for Zoning Administrator approval after November 1, 1986 provided the prior approval has not expired.~~
- (d) After the time period set forth in LAMC Section 12.23 C.4(b), all nonconforming oil wells shall be abandoned in a manner consistent with and in strict accordance with all applicable local, state, and federal laws, regulations, rules, and standards.
- (e) If an oil well is abandoned, or its operation is discontinued or idled for a continuous period of six months, such use shall be deemed terminated.
- (f) A well operator as defined by Public Resources Code Section 3237 shall comply with the mitigation measures and mitigation monitoring program adopted with Ordinance No. _____ in the plugging and abandoning of all wells.

Section 4. Subdivision 18 of Subsection U of Section 12.24 of the LAMC is deleted in its entirety.

- 18. ~~(None) Onshore installations required in connection with the drilling for or production of oil, gas or hydrocarbons when the installations are permitted by the conditions of the offshore oil-drilling district which is to be served.~~

Section 5. Subdivision 47 of Subsection W of Section 12.24 of the LAMC is deleted in its entirety.

- 47. ~~(None) Temporary geological exploratory core holes in all zones except the M3 Zone. The Zoning Administrator may approve the use of a site for a period of time deemed necessary to drill, test and abandon temporary geological exploratory core hole(s) provided that the time period may not exceed 200 days~~

~~unless the Zoning Administrator finds that the drilling activities cannot be completed within 200 days due to depth, or deviation, or number of temporary geological exploratory core hole(s) to be drilled. However, in no event shall the Zoning Administrator increase the time period beyond 200 days by more than an additional 165 days.~~

Section 6. Subsection A of Section 13.01 of the LAMC is amended as follows:

- A. Application.** The provisions of this section shall apply to the districts established by ordinance and to remain until said district is terminated in accordance with City Charter Section 558, ~~where the drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances are permitted.~~ The provisions of this section shall not apply to the property in the M3 Zone, except as specifically provided here to the contrary. The provisions of this section shall not apply to the location of subterranean gas holding areas or oil wells which are operated as a public utility regulated by the California Public Utilities Commission and ~~which are regulated by the provisions of Section 14.00 of this Code.~~

Section 7. Subsection B of Section 13.01 of the LAMC is amended as follows:

“Controlled Drilling Site” shall mean that particular location within an oil drilling district in an “Urbanized Area” upon which surface operations for the drilling, deepening or operation of an oil well or any incidental operation are ~~permitted under the terms of this section,~~ subject to the conditions prescribed by written determination by the Zoning Administrator.

“Drilling and Production Site in the Los Angeles City Oil Field Area” shall mean locations within an oil drilling district in the “Los Angeles City Oil Field Area” upon which surface operations for the drilling, deepening or operation of an oil well or any operation incident thereto, are ~~permitted under the terms of this section,~~ subject to the conditions prescribed by written determination by the Zoning Administrator.

“Los Angeles City Oil Field Area” shall mean all land in the City within the areas identified on the maps in Ordinance No. 156,166 located in Council File No. 80-3951 and shall include all oil producing zones beneath those areas but no deeper than the third zone beneath the surface of the earth.

“Nonurbanized Area” shall mean all those portions of the City which the City Planning Commission or Council has determined will not be detrimentally affected by the drilling, maintenance, or operation of oil wells. In making its determination, the City Planning Commission, or the Council on appeal, shall give due consideration to the amount of land subdivided, the physical improvements, the density of population and the zoning of the district.

~~**“Offshore Area”** shall mean all property in the City of Los Angeles which is between the mean high tide line and the outermost seaward City boundary.~~

“Oil Well” shall mean any well or hole already drilled, being drilled or to be drilled into the surface of the earth which is used or intended to be used in connection with coring,

or the drilling for prospecting for or producing petroleum, natural gas or other hydrocarbon substances, or is used or intended to be used for the subsurface injection into the earth of oil field waste, gases, water or liquid substances, including any such existing hole, well or casing which has not been abandoned in accordance with the requirements of Article 7 of Chapter 5 of this the Los Angeles Fire Code except any well operated by a public utility regulated by the California Public Utilities Commission.

“Oil Well Class I or A” shall mean any oil well drilled, conditioned, arranged, used or intended to be used for the production of petroleum.

“Oil Well Class II or B” shall mean any oil well drilled, conditioned, arranged, used or intended to be used only for the subsurface injection into the earth of oil field waste, gases, water or liquid substances.

“Producing Zone” shall mean a reservoir or series of reservoirs of sufficient thickness and productivity of hydrocarbons as to form an economic source of supply and which is segregated from other reservoirs or series of reservoirs by natural boundaries or barriers to such an extent as to make its separate development either economically or mechanically desirable in accordance with good oil field practice.

“Urbanized Area” shall mean all land in the City, except land in the M3 Zone, and land which has been determined to be “Nonurbanized Area” by the City Planning Commission or Council or land located in the “Los Angeles City Oil Field Area”.

Section 8. Subsection C of Section 13.01 of the LAMC is deleted in its entirety.

C. (None) Status of Areas. ~~Where uncertainty exists as to whether or not a particular area shall be continued as an urbanized area, any person contemplating filing a petition for the establishment of an oil drilling district, may prior to its filing, request the City Planning Commission to determine the status of the area in which the proposed district is to be located. The Commission shall refer the request to the Director of Planning for investigation and upon receipt of his or her report shall determine whether the area is “Urbanized” or “Nonurbanized”. The determination of the City Planning Commission may be appealed to the Council, which may, by resolution, approve or disapprove the determination.~~

Section 9. Subsection D of Section 13.01 of the LAMC is deleted in its entirety.

D. (None) Requirements for Filing:

~~1. **Non-urbanized Areas**—Each application for the establishment of an oil drilling district in an non-urbanized area shall include property having a net area or not less than one acre (excluding public streets, alleys walks or ways, except that an application may be filed on property containing less than one acre which is surrounded on all sides by streets. Such property may consist of one or more parcels of land which must be contiguous, except that said parcels may be separated by a public alley or walk.~~

~~2. **Urbanized Areas**~~

- ~~(a) Each application for the establishment of an oil drilling district in an urbanized area shall contain a statement that the applicant has the proprietary or contractual authority to drill for and produce oil, gas or other hydrocarbon substances under the surface of at least 75 per cent of the property to be included in said district.~~

~~Any municipal body or official required by law to consider and make a report or recommendation relative to or to approve or disapprove such application may request the applicant in writing to submit for inspection copies of leases and contracts held by applicant in support of such asserted proprietary or contractual authority. The limitations of time for acting upon such application shall be suspended from the time of mailing such request until the documents requested have been submitted.~~

- ~~(b) Where said authority to drill for and produce oil, gas and other hydrocarbons is pursuant to contract, said application shall be accompanied by a copy thereof, and said contract shall have attached thereto and referred to therein by reference the following information for the contracting parties:~~

~~(1) A summary of the provisions of the Los Angeles Municipal Code, as amended, which are applicable to the district, prepared or approved by the Board of Public Works or its designee;~~

~~(2) Any additional information which the person in charge of Petroleum Administration finds from time to time is required to give all contracting parties a reasonably complete knowledge of oil and gas leasing requirements and procedures in urbanized areas within the City of Los Angeles.~~

- ~~(c) The district described in said application shall be not less than 40 acres in area, including all streets, ways and alleys within the boundary thereof; shall be substantially compact in area; and the boundaries thereof shall follow public streets, ways or alleys as far as practicable.~~

- ~~(d) Each applicant for the establishment of an oil drilling district in an urbanized area shall be accompanied by a report from a petroleum geologist who~~

~~(1) is an active member of the American Association of Petroleum Geologists or the American Institute of Professional Geologists or~~

~~(2) meets the educational and experience requirements to become an active member of the American Association of Petroleum Geologists or the American Institute of Professional Geologists; that the production of oil from under the proposed district would not, in his or her opinion, result in any noticeable subsidence. If the City's authorized person in charge of Petroleum Administration disagrees in any way with the report, he or she shall submit in~~

~~writing his or her own views on the report as part of the report to the City Planning Commission.~~

- ~~3. **Offshore Areas.** Each application for the establishment of an oil drilling district in an offshore area shall include property having a net area of not less than 1,000 acres.~~
- ~~4. **Los Angeles City Oil Field Area.** Each application for the establishment of an oil drilling district in the Los Angeles City Oil Field Area shall:~~
 - ~~(a) Include property not less than one acre in size, bounded on each side by a public street, alley, walk or way and such district shall be wholly contained within the Los Angeles City Oil Field Area.~~
 - ~~(b) Contain a statement that the applicant has the proprietary or contractual authority to drill for and produce oil, gas or other hydrocarbon substances under the surface of at least 75% of the total land area of the property to be included in said district.~~

~~Any municipal body or official required by law to consider and make a report or recommendation relative to or to approve or disapprove such application may request the applicant in writing to submit for inspection copies of leases and contracts held by applicant in support of such asserted proprietary or contractual authority. The limitations of time for acting upon such application shall be suspended from the time of mailing such request until the documents requested have been submitted.~~

~~[Editor's note: Maps formerly referred to in this section were deleted by Ord. No. 177,103, Eff. 12/18/05.]~~

- ~~5. **General – All Areas.** No application for the establishment of an oil drilling district shall be accepted for filing in the City Planning Department unless it has first been submitted to and reported on by the authorized person in charge of Petroleum Administration. The report shall consider the propriety of the proposed boundaries of the district, the desirability of the drill site location and whether or not the exploration for oil is geologically justified in the district. The report shall be made within 30 days of the receipt of the application. A copy of the report shall accompany the application when it is filed with the City Planning Department.~~

Section 10. Subsection E of Section 13.01 of the LAMC is **amended as follows:**

- E. Standard Conditions.** These Standard Conditions remain only to the extent that they are incorporated by ordinance through the establishment of an oil drilling district:
 - 1. Non-urbanized Areas** – Each oil drilling district established in a non-urbanized area shall be subject to the following conditions:

- (a) Each district shall contain a net area of one acre or more which shall be composed of contiguous parcels of land that may be separated by an alley or walk, except that a district may contain an area of less than one acre where it is surrounded on all sides by streets.
- (b) Each drilling site in any district shall contain a net area of one acre or more and shall be composed of contiguous parcels of land which may be separated only by an alley or walk. A drilling site may contain less than one acre of area where it is surrounded on all sides by public or approved private streets.

Only one oil well Class L or A may be established or maintained on each acre of land, except that there may be one oil well Class L or A on any land surrounded on all sides by public or approved private streets. Provided, however, in determining conditions for drilling pursuant to former Subsection H, the Zoning Administrator may permit surface operations for more than one oil well Class L or A in a semi-controlled drilling site where the additional wells are to be bottomed under adjacent land in a drilling district in lieu of surface operations. There shall be no less than one net acre of land in the combined drill site and production site for each well in a semi-controlled drilling site. The Zoning Administrator shall require a site of more than one acre for each oil well where a larger area is required in the particular oil drilling district. The Zoning Administrator may require larger minimum drilling sites or production areas when reasonably necessary in the public interest for a particular oil producing section.

Where drilling sites greater than one acre are required and two or more lessees or oil drilling developers in a block or area have at least one net acre each, but all lessees or developers do not have the greater area required for drilling under these regulations, the Zoning Administrator shall equitably allocate permitted wells among the competing lessees or developers. Where necessary, the lessee or developer having control of the larger portion of the property shall be given preference. In those situations outlined above, in addition to the proration required by Paragraph (d) of this subdivision, the Zoning Administrator shall require that the lessee or developer who is authorized to drill the well shall offer an equitable consolidation agreement to the lessee or developer who has not been permitted to drill. This consolidation agreement shall contain an offer in writing, open for acceptance for 30 days, giving the other lessees or developers a choice of either:

- (i) a lease on terms and conditions agreed upon, or on substantially the same terms and conditions contained in leases owned by the applicant; or,
- (ii) a consolidation agreement agreed upon providing that each lessee or developer shall contribute to the cost of drilling and operation of the well and share in the production from the well in

the proportion that the area of his property bears to the total area in the drilling unit.

- (c) No public street, alley, walk or way shall be ~~he~~ included in determining the net area within any district or drilling site.
 - (d) Where the drilling site is so located as to isolate any parcel of land in the drilling district in such a manner that it could not be joined with any other land so as to create another drilling site of the area required in the particular district in which it is located, the Zoning Administrator shall require, as a condition to the drilling and production on the drilling site that the owner, lessee or permittee or his or her successor shall pay to the owners of the oil and gas mineral rights in each isolated parcel, a pro-rata share of the landowners' royalty in all of the oil and gas produced from the drilling site, the share to be in that proportion as the net area of the isolated parcel is to the total net area of the drilling site plus the area of all the isolated parcels; provided that the landowners' royalty shall be determined in accordance with any existing contracts for payments to the landowners of the drilling site, but, in no event, as to the owner of the isolated parcel or parcels, shall it be less than a 1/6th part of the oil and gas produced and saved from the drilling site.
2. **Urbanized Areas** – Each oil drilling district established in an urbanized area shall be ~~he~~ subject to the following conditions:
- (a) Each district shall be not less than 40 acres in area, including all streets, ways and alleys within the boundaries thereof.
 - (b) Not more than one controlled drill site shall be permitted for each 40 acres in any district and that site shall not be larger than two acres when used to develop a district approximating the minimum size; provided, however, that where the site is to be used for the development of larger oil drilling districts or where the Zoning Administrator requires that more than one oil drilling district be developed from one controlled drilling site, the site may be increased, at the discretion of the Zoning Administrator when concurred in by the Board of Fire Commissioners, by not more than two acres for each 40 acres included in the district or districts.
 - (c) The number of oil wells Class L ~~or~~ A which may be drilled and operated from any controlled drilling site may not exceed one well to each five acres in the district or districts to be explored from said site.

Notwithstanding the above, should the City Council determine that an urbanized oil drilling district contains more than one producing zone, the City Council may then authorize, by ordinance, the drilling of additional oil wells Class L ~~or~~ A, not to exceed one well per five acres for each identified producing zone, and specify the maximum number of wells to be drilled as the result of such authorization.

- (d) Each applicant, requesting a determination by the Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in former Subsection H of this section, must have proprietary or contractual authority to drill for oil under the surface of at least 75 percent of the property in the district to be explored.
- (e) Each applicant or his or her successor in interest shall, within one year from the date the written determination is made by a Zoning Administrator prescribing the conditions controlling drilling and production operations as provided in former Subsection H of this section, execute an offer in writing giving to each record owner of property located in the oil drilling district who has not joined in the lease or other authorization to drill the right to share in the proceeds of production from wells bottomed in the district, upon the same basis as those property owners who have, by lease or other legal consent, agreed to the drilling for and production of oil, gas or other hydrocarbon substances from the subsurface of the district. The offer hereby required must remain open for acceptance for a period of five years after the date the written determination is made by a Zoning Administrator. During the period the offer is in effect, the applicant, or his or her successor in interest, shall impound all royalties to which the owners or any of them may become entitled in a bank or trust company in the State of California, with proper provisions for payment to the record owners of property in the district who had not signed the lease at the time the written provisions were made by a Zoning Administrator, but who accepts the offer in writing within the five-year period. Any such royalties remaining in any bank or trust company at the time the offer expires which are not due or payable as provided above shall be paid pro-rata to those owners who, at the time of the expiration, are otherwise entitled to share in the proceeds of the production.
- (f) The entire controlled drilling site shall be adequately landscaped, except for those portions occupied by any required structure, appurtenance or driveway, and all landscaping shall be maintained in good condition at all times. Plans showing the type and extent of the landscaping shall be first submitted to and approved by the Zoning Administrator.
- (g) Each applicant, requesting a determination by a Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in former Subsection H of this section, shall post in the Office of Zoning Administration a satisfactory corporate surety bond (to be approved by the City Attorney and duplicates to be furnished to him or her) in the sum of \$5,000 in favor of the City of Los Angeles, conditioned upon the performance by the applicant of all of the conditions, provisions, restrictions and requirements of this section, and all additional conditions, restrictions or requirements determined and prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator or any change or specifications or requirements that may be approved or required by him or her or by any other officer or department of the City or any other alteration, modification of waiver affecting any of the obligations of the grantee made by any City authority or by any other

power or authority whatsoever shall be deemed to exonerate either the grantee or the surety on any bond posted pursuant to this section.

- (h) If a Zoning Administrator determines, after first receiving a report and recommendation from the Board of Public Works or its designee, that oil drilling and production activities within the district have caused or may cause subsidence in the elevation of the ground within the district or in the immediate vicinity, then after consulting with recognized experts in connection with that problem and with those producing hydrocarbons from the affected area, he or she shall have the authority to require the involved oil producer or producers to take corrective action, including re-pressurizing the oil producing structure or cessation of oil drilling and production.
- (i) A Zoning Administrator may impose additional conditions or require corrective measures to be taken if he or she finds, after actual observation or experience with drilling one or more of the wells in the district, that additional conditions are necessary to afford greater protection to surrounding property.

3. ~~(None) Offshore Areas. Each oil drilling district established in an offshore area shall be subject to the following conditions:~~

- ~~(a) All activities conducted within each such district shall conform to the spirit and intent of the provisions of Subsection A of Section 12.20.1 of this Code.~~
- ~~(b) No surface or submarine drilling or producing operations shall be permitted between the mean high tide line and the outermost seaward City boundary. Surface drilling or producing operations may be conducted only from permitted or approved onshore drillsites. Oil and gas accumulations may be developed by directional or slant drilling beneath any portion of the submerged land within the district.~~
- ~~(c) Onshore drilling and producing operations utilizing directional or slant drilling may be approved by a Zoning Administrator only when a showing is made that production of oil and gas cannot be accomplished from already approved or permissible sites.~~
- ~~(d) The number of oil wells Class A which may be drilled into any offshore drilling district from a single installation or facility onshore shall not exceed one well to each five acres of district and the installation and operation of all wells shall meet the requirements of Section 12.20.1.~~
- ~~(e) Each applicant requesting a determination by a Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in Subsection H, shall post in the Office of Zoning Administration a satisfactory corporate surety bond (to be approved by the City Attorney and duplicates to be furnished to him or her) in the sum of \$50,000 in favor of the City of Los Angeles, conditioned upon the~~

~~performance by the applicant of all of the conditions, provisions, restrictions and requirements of this section, and all additional conditions, restrictions, or requirements determined and prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator on any change of specifications or requirements that may be approved or required by him or her or by any other officer or department of the City or any other alteration, modification or waiver affecting any of the obligations of the applicant made by any City authority or by any other power or authority whatsoever shall be deemed to exonerate either the applicant or the surety on any bond posted pursuant to this section.~~

~~(f) All derricks and other drilling facilities shall be removed within 30 days after completion or abandonment of the well; and thereafter any work done on any existing well which requires redrilling or reconditioning shall be done by temporary or portable equipment which shall be removed within 30 days after completion of such work.~~

~~(g) Pollution of water and contamination or soiling of the urban coastline or beaches are prohibited.~~

4. Los Angeles City Oil Field Area. – Each oil drilling district established in the Los Angeles City Oil Field Area shall be subject to the following conditions:

- (a) The boundary of each district shall follow the center line of city streets as far as practicable;
- (b) Each district shall include the streets, ways, and alleys within the boundaries thereof and shall be substantially compact in area;
- (c) The drilling, pumping, redrilling, repairing, maintenance or other servicing of any new oil well Class I or A in said district shall be conducted only on a Drilling and Production Site in the Los Angeles City Oil Field Area upon which site at least one Class I or A oil well was (i) in existence on January 24, 1982; and (ii) had not been abandoned in accordance with State Division of Oil and Gas regulations prior to January 24, 1982; and (iii) has a Los Angeles Fire Department Serial Number, which number was in existence on January 24, 1982.
- (d) The number of new oil wells Class I or A permitted on such a Drilling and Production Site in the Los Angeles City Oil Field Area shall not exceed one well to each acre in the District;
- (e) Each applicant, requesting a determination by the Zoning Administrator prescribing the conditions controlling new drilling and production operations as provided in former Subsection H, must have proprietary or contractual authority to drill for oil under the surface of at least 75% of the total land area of the property in the district to be explored.

- (f) Within one year from the date the written determination is made by a Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in former Subsection H, each applicant or his or her successor in interest shall offer in writing to each record owner of property located in the oil drilling district who has not joined in the lease or other authorization to drill, the right to share in proceeds of production from new wells bottomed in the district upon the same basis as those property owners who have, by lease or other legal consent, agreed to the drilling for and production of oil, gas or other hydrocarbon substances from the sub-surface of the district. The offer hereby required must remain open for acceptance for a period of five years after the date the written determination is made by a Zoning Administrator. During the period the offer is in effect, the applicant, or his or her successor in interest, shall impound all royalties to which the owners or any of them may become entitled in a bank or trust company in the State of California, with proper provisions for payment to the record owners of property in the district who had not signed the lease at the time the written determination was made by a Zoning Administrator, but who accepts the offer in writing within the five-year period. Any royalties remaining in any bank or trust company at the time the offer expires which are not due or payable as provided above shall be paid pro-rata to those owners who, at the time of the expiration, are otherwise entitled to share in the proceeds of the production.
- (g) the entire site upon which new oil wells are to be drilled shall be adequately fenced and landscaped; plans showing the type and extent of the landscaping shall be first submitted to and approved by the Zoning Administrator.
- (h) Each applicant requesting a determination by a Zoning Administrator prescribing the conditions controlling drilling and production operations, as provided in former Subsection H, shall post in the Office of Zoning Administration a satisfactory corporate surety bond (to be approved by the City Attorney and duplicates to be furnished by him or her) in the sum of \$5,000 in favor of the City of Los Angeles, conditioned upon the performance by the applicant of all of the conditions, provisions, restrictions, and requirements of this section, and all additional conditions, restrictions, or requirements determined and prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator or any change of specifications or requirements that may be approved or required by him or her or by any other officer or department of the City or any other alteration, modification or waiver affecting any of the obligations of the grantee made by any city authority or by any other power or authority whatsoever shall be deemed to exonerate either the grantee or the surety of any bond posted pursuant to this section.
- (i) If a Zoning Administrator determined after first receiving a report and recommendation from the Board of Public Works or its designee that oil drilling and production activities within the district have caused or may cause subsidence in the elevation of the ground within the district or in the

immediate vicinity, he or she shall have the authority, after consulting with recognized experts in connection with the problem and with those persons producing hydrocarbons from the affected area, to require the involved oil producer or producers to take corrective action, including re-pressurizing the oil producing structure or cessation of oil drilling and production.

- (j) A Zoning Administrator may impose additional conditions or require corrective measures to be taken if he or she finds, after actual observation or experience with drilling one or more of the wells in the district, that additional conditions are necessary to afford greater protection to surrounding property.
- (k) Any operator of any site within an oil drilling district, approved by the Zoning Administrator pursuant to Section 12.23C4(c), may apply to the Department of City Planning for the establishment of fencing and landscaping requirements. Once the requirements have been satisfied, the operator shall be relieved of the restrictions specified in Section 12.23C4(b) and (c). Should an operator of such a site in a district desire to redrill or deepen a Class I or A oil well, if the oil well was
 - (i) in existence on January 24, 1982; and
 - (ii) had not been officially abandoned in accordance with State Division of Oil and Gas Regulations prior to January 24, 1982; and
 - (iii) has a Los Angeles Fire Department Serial Number and the number was in existence on January 24, 1982, that operator shall comply with the provisions of former Subsection H of Section 13.01. Compliance with the Determination of Conditions issued shall relieve the operator of the restrictions specified in Section 12.23C4(b) and (c) of this Code.

Section 11. Subsection F of Section 13.01 of the LAMC is amended as follows:

- F. Additional Conditions.** In addition to the standard conditions applying to oil drilling districts, the Council, by ordinance, or the Zoning Administrator may have imposed other conditions in each district as deemed necessary and proper. These Additional Conditions remain only to the extent that they were incorporated by reference in an ordinance or into approvals issued by the Zoning Administrator under former Subsection H and I of Section 13.01 prior to _____. ~~Where these conditions are imposed by ordinance, they may be subsequently modified or deleted in the following manner:~~

- ~~(a) where the condition relates to the location of a drill site within a district, by amending the ordinance, only after the submission of an application, the payment of fees, notice, hearing and procedure identical to that required by this article for the establishment of an oil drilling district; and~~

~~(b) where the condition does not relate to the location of a drill site, by amending the ordinance, without the necessity of fees, notice or hearing.~~

~~In its report to the Council relative to the establishment of a district, the City Planning Commission may recommend conditions for consideration. Some of these additional conditions, which may have been imposed in the ordinance establishing the districts or by the Zoning Administrator in determining the drilling site requirements, and which may have been applied by reference, are as follows:~~

1. That all pumping units established in said district shall be installed in pits so that no parts thereof will be above the surface of the ground.
2. That all oil produced in said district shall be carried away by pipe lines or, if stored in said district, shall be stored in underground tanks so constructed that no portion thereof will be above the surface of the ground.
3. That the operator of any well or wells in the district shall post in the Office of Zoning Administration a \$5,000 corporate surety bond conditioned upon the faithful performance of all provisions of this article and any conditions prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator, or change of specifications or requirements that may be approved or required by him or her or by any other officer or department of the City, or other alteration, modification or waiver affecting any of the obligations of the grantee made by any City authority shall be deemed to exonerate either the grantee or the surety on any bond posted as required in this article.
4. That the operators shall remove the drilling rig ~~derriek~~ from each well within thirty (30) days after the drilling of said well has been completed, and thereafter, when necessary, such completed wells shall be serviced by portable drilling rigs ~~derrieks~~.
5. That the drilling site shall be fenced or landscaped as prescribed by the Zoning Administrator.
6. **(None)**
7. That, except in case of emergency, no materials, equipment, tools or pipe used for either drilling or production operations shall be delivered to or removed from the drilling site, except between the hours of 8:00 A.M. and 8:00 P.M. of any day.
8. That adequate fire fighting apparatus and supplies, approved by the Fire Department, shall be maintained on the drilling site at all times during drilling and production operations.
9. That no refining process or any process for the extraction of products from natural gas shall be carried on at a drilling site.
10. **(None)**
11. **(None)**

12. **(None)**

13. **(None)** That no more than one well shall be bottomed in each five (5) acres of the drilling district.

14. That no new oil wells shall be spudded in after the President of the United States, or other proper authority, has declared that a state of war no longer exists.

15. **(None)**

16. **(None)**

17. That any person requesting a determination by the Zoning Administrator prescribing the conditions under which oil drilling and production operations shall be conducted as provided in former Subsection H, shall agree in writing on behalf of him or herself and his or her successors or assigns, to be bound by all of the terms and conditions of this article and any conditions prescribed by written determination by the Zoning Administrator; provided, however, that the agreement in writing shall not be construed to prevent the applicant or his or her successors or assigns from applying at any time for amendments pursuant to this Article or to the conditions prescribed by the Zoning Administrator, or from applying for the creation of a new district or an extension of time for drilling or production operations.

18. That all production equipment used shall be so constructed and operated that no noise, vibration, dust, odor or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall ever be permitted to result from production operations carried on at any drilling site or from anything incident thereto to the injury or annoyance of persons living in the vicinity; nor shall the site or structures thereon be permitted to become dilapidated, unsightly or unsafe. Proven technological improvements in methods of production shall be adopted as they, from time to time, become available if capable of reducing factors of nuisance or annoyance.

19. Wells which are placed upon the pump shall be pumped by electricity with the most modern and latest type of pumping units of a height of not more than sixteen (16) feet. All permanent equipment shall be painted and kept in neat condition. All production operations shall be as free from noise as possible with modern oil operations.

20. All drilling equipment shall be removed from the premises immediately after drilling is completed, sump holes filled, and drilling or service rigs ~~derrick~~s removed within sixty (60) days after the completion of the well.

21. That, subject to the approval of the Board of Fire Commissioners, the operators shall properly screen from view all equipment used in connection with the flowing or pumping of wells.

22. Upon the completion of the drilling of a well the premises shall be placed in a clean condition and shall be landscaped with planting of shrubbery so as to screen from public view as far as possible, the tanks and other permanent equipment, such landscaping and shrubbery to be kept in good condition.
23. That not more than two wells may be drilled in each city block of the drilling district and bottomed under that block. However, at the discretion of the Zoning Administrator, surface operations for additional wells may be permitted in each of the blocks where each additional well is to be directionally drilled and bottomed under an adjacent block now or hereafter established in an oil drilling district in lieu of a well drilled on the adjacent block and under a spacing program which will result in not exceeding two wells bottomed under each block.
24. That not more than one (1) well shall be drilled in each city block of the drilling district; provided, however, that a second well may be drilled in that block bounded by "L", Gulf Avenue, Denni Street and Wilmington Boulevard, only in the event said second well be directionally drilled or whipstocked so that the bottom of the hole will be bottomed under the (Gulf Avenue School property located in the block bounded by "L" Street, Roman Avenue, Denni Street and Gulf Avenue, and in lieu of a well which might otherwise be permitted to be drilled in said last mentioned block.
25. That not more than one (1) well may be drilled in each city block of the drilling district.
26. That all power operations other than drilling in said district shall at all times ~~be~~ be carried on only by means of electrical power, which power shall not be generated on the drilling site.
27. **(None)**
28. **(None)**
29. That not more than two (2) wells may be drilled in each city block of the drilling district; provided, however, that two (2) additional wells may be drilled in each of the following described blocks, (a) the block bounded by Q Street, Lakme Avenue, Sandison Street and Broad Avenue and (b) the block bounded by Sandison Street, Lakme Avenue, Broad Avenue and the southerly boundary of Tract No. 1934, but only if such additional wells are directionally drilled or whipstocked so that they will be bottomed under the Hancock-Banning High school property, located in the block bounded by Delores Street, Broad Avenue, Pacific Coast Highway and Avalon Boulevard, in lieu of the four (4) wells which might otherwise be permitted to be drilled in the last mentioned block.
30. **(None)**
31. Not more than four (4) controlled drilling sites shall be permitted in this district, and such sites shall not be larger than two (2) acres.

32. The number of wells which may be drilled to any oil sand from the controlled drilling site shall not exceed one (1) well to each five (5) acres in the district, but in no event shall there be more than one (1) well to each two and one-half (2 1/2) acres.
33. That drilling operations shall be commenced within 90 days from the effective date the written determination is made by the Zoning Administrator or Area Planning Commission, or within any additional period as the Zoning Administrator may, for good cause, allow and thereafter shall be prosecuted diligently to completion or else abandoned strictly as required by law and the premises restored to their original condition as nearly as practicable as can be done. If a producing well is not secured within eight months, the well shall be abandoned and the premises restored to its original condition, as nearly as practicable as can be done. The Zoning Administrator, for good cause, shall allow additional time for the completion of the well.
34. That an internal combustion engine or electrical equipment may be used in the drilling or pumping operations of the well, and if an internal combustion engine is used, that mufflers be installed on the mud pumps and engine so as to reduce noise to a minimum, all of said installations to be done in a manner satisfactory to the Fire Department and to the Zoning Administrator.
35. **(None)**
36. That not more than two (2) production tanks shall be installed for each producing well, neither one of which shall have a rated capacity in excess of one thousand (1,000) barrels; provided, however, that if in the opinion of the Zoning Administrator it is necessary in order to provide for the maximum safety of operations or to decrease the number of individual production tank settings on any property, the Zoning Administrator may increase the number of such production tanks to not more than three (3), having a greater capacity not to exceed two thousand (2,000) barrels each. The Zoning Administrator shall permit such wash tanks or heating facilities as may appear necessary to ship or remove production from the premises. The plans for said tank or tanks, including the plot plan showing the location thereof on the property, shall be submitted to and approved in writing by the Zoning Administrator before said tank or tanks and appurtenances are located on the premises; and that said tank or tanks and appurtenances shall be kept painted and maintained in good condition.
37. All waste substances such as drilling muds, oil, brine or acids produced or used in connection with oil drilling operations or oil production shall be retained in water-tight receptors from which they may be piped or hauled for terminal disposal in a dumping area specifically approved for such disposal by the Los Angeles Regional Water Pollution Control Board No. 4.
38. Any wells drilled shall be cased tight to bedrock or effective means satisfactory to the State Oil and Gas Supervisor ~~Department of Water and Power~~ used to prevent vertical movement of ground water.

39. The applicant shall provide the Department of Water and Power and the State Oil and Gas Supervisor with a precise plot plan of the drilling plant and roads leading thereto, and to make such safeguards as the Department deems necessary to assure the safety of the existing 50" water main which crosses the district involved.
40. The Department of Water and Power of the City of Los Angeles shall be permitted to review and inspect methods used in the drilling and producing operations and in the disposal of waste, and shall have the right to require changes necessary for the full protection of the public water supply.
41. **(None)**
42. That the number of wells which may be drilled to any oil sand shall not exceed one (1) well to each five (5) acres in the district, but in no event shall there be more than one (1) well to each two and one-half acres.
43. That drilling, pumping and other power operations shall at all times be carried on only by electrical power and that such power shall not be generated on the controlled drilling site or in the district.
44. That an internal combustion engine or steam-driven equipment may be used in the drilling or pumping operations of the well, and, if an internal combustion engine or steam-driven equipment is used, that mufflers be installed on the mudpumps and engine; and that the exhaust from the steam-driven machinery be expelled into one of the production tanks, if such tanks are permitted, so as to reduce noise to a minimum, all of said installations to be found in a manner satisfactory to the Fire Department and Zoning Administrator.
45. That drilling operations shall be carried on or conducted in connection with only one well at a time in any one such district, and such well shall be brought in or abandoned before operations for the drilling of another well are commenced; provided, however, that the Zoning Administrator may permit the drilling of more than one well at a time after the discovery well has been brought in.
46. That all oil drilling and production operations shall be conducted in such a manner as to eliminate, as far as practicable, dust, noise, vibration or noxious odors, and shall be in accordance with the best accepted practices incident to drilling for and production of oil, gas and other hydrocarbon substances. Proven technological improvements in drilling and production methods shall be adopted as approved by the Zoning Administrator, as they may become, from time to time, available, if capable of reducing factors of nuisance and annoyance.
47. That all parts of the drilling or service rig derrick above the drilling or service rig derrick floor not reasonably necessary for ingress and egress including the elevated portion thereof used as a hoist, shall be enclosed with fire-resistive soundproofing material approved by the Fire Department and the Zoning Administrator, and the same shall be painted or stained so as to render the appearance of said drilling or service rig derrick as unobtrusive as practicable.

48. That all tools, pipe and other equipment used in connection with any drilling or production operations shall be screened from view, and all drilling operations shall be conducted or carried on behind a solid fence, which shall be maintained in good condition at all times and be painted or stained so as to render such fence as unobtrusive as practicable.
49. That no materials, equipment, tools or pipe used for either drilling or production operations shall be delivered to or removed from the controlled drilling site except between the hours of 8:00 o'clock a.m. and 6:00 o'clock p.m., on any day, except in case of emergency incident to unforeseen drilling or production operations, and then only when permission in writing has been previously obtained from the Zoning Administrator.
50. That no earthen sumps shall be used.
51. That within sixty (60) days after the drilling of each well has been completed, and said well placed on production, or abandoned, the drilling or service rig derrick, all boilers and all other drilling equipment shall be entirely removed from the premises unless such drilling or service rig derrick and appurtenant equipment is to be used within a reasonable time limit determined by the Administrator for the drilling of another well on the same controlled drilling site.
52. That no oil, gas or other hydrocarbon substances may be produced from any well hereby permitted unless all equipment necessarily incident to such production is completely enclosed within a building, the plans for said building to be approved by the Department of Building and Safety and the Fire Department. This building shall be of a permanent type, of attractive design and constructed in a manner that will eliminate as far as practicable, dust, noise, noxious odors and vibrations or other conditions which are offensive to the senses, and shall be equipped with such devices as are necessary to eliminate the objectionable features mentioned above. The architectural treatment of the exterior of such building shall also be subject to the approval of the Administrator.
53. That no oil, gas or other hydrocarbon substances may be produced from any well hereby permitted where same is located within or immediately adjoining subdivided areas where ten (10) percent of the lots or subdivided parcels of ground, within one-half (1/2) mile radius thereof, are improved with residential structures, unless all equipment necessarily incidental to such production is countersunk below the natural surface of the ground and such installation and equipment shall be made in accordance with Fire Department requirements.
54. That there shall be no tanks or other facilities for the storage of oil erected or maintained on the premises and that all oil products shall be transported from the drilling site by means of an underground pipe line connected directly with the production pump without venting products to the atmospheric pressure at the production site.
55. That not more than two production tanks shall be installed on said drilling site, neither one of which shall have a rated capacity in excess of one thousand (1000) barrels; that the plans for said tank or tanks, including the plot plans

showing the location thereof on the property, shall be submitted to and approved in writing by the Administrator before said tank or tanks and appurtenances are located on the premises, and that said tank or tanks and appurtenances shall be kept painted and maintained in good condition at all times.

56. That any production tanks shall be countersunk below the natural surface of the ground and the installation thereof shall be made in accordance with safety requirements of the Fire Department.
57. That no refinery, dehydrating or absorption plant of any kind shall be constructed, established or maintained on the premises at any time.
58. That no sign shall be constructed, erected, maintained or placed on the premises or any part thereof, except those required by law or ordinance to be displayed in connection with the drilling or maintenance of the well.
59. That suitable and adequate sanitary toilet and washing facilities shall be installed and maintained in a clean and sanitary condition at all times.
60. That any owner, lessee or permittee and their successors and assigns, must at all times be insured to the extent of one hundred thousand dollars (\$100,000) against liability in tort arising from drilling or production, or activities or operations incident thereto, conducted or carried on under or by virtue of the conditions prescribed by written determination by the Zoning Administrator as provided in former Subsection H of this section. The policy of insurance issued pursuant hereto shall be subject to the approval of the City Attorney, and duplicates shall be furnished to him. Each such policy shall be conditioned or endorsed to cover such agents, lessees or representatives of the owner, lessee or permittee as may actually conduct drilling, production or incidental operations permitted by such written determination by the Administrator.
61. **(None)**
62. All onshore drilling and production installations or facilities shall be removed and the premises restored to their original conditions after all oil and gas wells have been abandoned, unless the City Planning Commission determines otherwise.
63. **(None)**
64. **(None)**

Section 12. Subsection G of Section 13.01 of the LAMC is deleted in its entirety.

G. (None) ~~Description of Districts~~ ~~The districts within which the drilling for and production of oil, gas or other hydrocarbon substances is permitted, and the conditions applying thereto (subject to further conditions imposed by the Administrator in the drilling site requirements), are described as follows:~~

- ~~1. **Districts in Non-urbanized Areas.** (For boundaries of districts and special conditions applicable thereto, refer to maps and records in City Planning Office).~~
- ~~2. **Districts in Urbanized Areas.** (For boundaries of districts and special conditions applicable thereto, refer to maps and records in City Planning Office).~~
- ~~3. **Districts in Offshore Areas.** (For boundaries of districts and special conditions applicable thereto, refer to maps and records in City Planning Office.)~~
- ~~4. **Districts in the Los Angeles City Oil Field Area.** (For boundaries of such districts and any conditions applicable thereto, refer to maps and records in the City Planning Office.)~~

Section 13. Subsection H of Section 13.01 of the LAMC is deleted in its entirety.

- H. (None) Drilling Site Requirements.** ~~Any person desiring to drill, deepen or maintain an oil well in an oil drilling district that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in the M3 Zone within 500 feet of a more restrictive zone shall file an application in the Department of City Planning on a form provided by the Department, requesting a determination of the conditions under which the operations may be conducted.~~

~~The Zoning Administrator, after investigation, may deny the application if they he finds that there is available and reasonably obtainable in the same district or in an adjacent or nearby district within a reasonable distance one or more locations where drilling could be done with greater safety and security with appreciably less harm to other property, or with greater conformity to the comprehensive zoning map. A Zoning Administrator shall deny an application for a drill site in an urbanized or off-shore area unless the applicant first files with the Zoning Administrator in a form and executed in a manner approved by a Zoning Administrator.~~

- ~~1. either of the following continuing written offers
 - ~~(a) to make the drill site available to competing operators upon reasonable terms, or~~
 - ~~(b) to enter into or conduct joint operations for a unit or cooperative plan of development of hydrocarbon reserves upon reasonable terms, if whichever course offered is determined to be feasible by a Zoning Administrator, and is subsequently required by him or her in order to effectuate the above set forth purposes, and~~~~
- ~~2. an agreement to abide by the determination of the Board of Public Works or its designee if any dispute arises as to the reasonableness of those terms after first having an opportunity to be heard. Where the district is in a nonurbanized area, in the Los Angeles City Oil Field Area, or in those cases where a Zoning Administrator approves an application in an urbanized or off-shore area, a Zoning Administrator shall determine and prescribe additional conditions or limitations, not in conflict with those specified in the ordinance establishing the district, which~~

~~he or she deems appropriate in order to give effect to the provisions of this section and to other provisions of this chapter relating to zoning. Where the proposed operation is in the M3 Zone and is within 500 feet of a more restrictive zone, a Zoning Administrator shall prescribe conditions and limitations, if any, as he or she deems appropriate to regulate activity which may be materially detrimental to property in the more restrictive zone. All conditions previously imposed by a Zoning Administrator in accordance with the provisions of this chapter are continued in full force and effect.~~

~~A Zoning Administrator shall make his or her written determination within 60 days from the date of the filing of an application and shall forthwith transmit a copy to the applicant.~~

~~The determination shall become final after an elapsed period of 15 days from the mailing of the notification to the applicant, unless an appeal is filed within that period, in which case the provisions of Section 12.24B through I concerning the filing and consideration of appeals shall apply.~~

Section 14. Subsection I of Section 13.01 of the LAMC is deleted in its entirety.

- I. (None) Permits.** ~~No person shall drill, deepen or maintain an oil well or convert an oil well from one class to the other and no permits shall be issued for that use, until a determination has been made by the Zoning Administrator or Area Planning Commission pursuant to the procedure prescribed in Subsection H of this section.~~

Section 15. Subsection J of Section 13.01 of the LAMC is deleted in its entirety.

- J. (None) Termination of District.** ~~Any ordinance establishing the districts described in this section shall become null and void one year after the effective date thereof unless oil drilling operations are commenced and diligently prosecuted within such one year period; provided, however, a Zoning Administrator, upon recommendation of the Board of Public Works or its designee, may extend the termination date for four consecutive additional periods not to exceed one year each, prior to the termination date of each period, if written request is filed therefor with the office of the Zoning Administration setting forth the reasons for said request and a Zoning Administrator determines that good and reasonable cause exists therefor.~~

~~Similarly, a Zoning Administrator, upon recommendation of the Board of Public Works or its designee, may extend the termination date for three consecutive additional periods not to exceed one year each, prior to the termination date of each period, for those districts which are part of a group undergoing development from one or more common controlled drilling sites, provided that written request is filed, which sets forth the reasons for the request therefor and the Zoning Administrator determines that good and reasonable cause exists therefor, and providing further that drilling operations have been diligently prosecuted from the common controlled drilling site during the previous extension period. Additional one-year extensions may be made by a Zoning Administrator subject to the approval of the City Planning Commission.~~

~~Any ordinance establishing an urbanized oil district shall become null and void one year after all wells drilled in the district after the effective date of said ordinance have been abandoned in accordance with legal requirements, unless a Zoning Administrator determines that the district is part of a group undergoing development from one or more common, controlled drilling sites, or on the basis of sufficient proof determines that production is allocated thereto from an adjacent, adjoining or near by drilling district or districts under a unit or pooling agreement. In such cases a Zoning Administrator may if he finds that good and reasonable cause exists therefor, extend the termination date of the expiring district to coincide with the termination date of the other district or districts in which the one or more common controlled drilling sites are located or from which production is allocated under a unit or pooling agreement. A Zoning Administrator may terminate any such district when the reasons for such extension no longer apply.~~

~~Any ordinance establishing a non-urbanized district or district in the Los Angeles City Oil Field Area shall become null and void one year after all wells in the district have been abandoned in accordance with legal requirements, unless the Zoning Administrator, on the basis of sufficient proof, determines that the district is part of a group in which secondary hydrocarbon recovery operations are taking place, and that production from an adjoining or adjacent district is allocated thereto under a unit or pooling agreement. In such cases, a Zoning Administrator may, if he finds that good and reasonable cause exists therefor, extend the termination date to coincide with the termination date of the adjoining or adjacent district in which secondary recovery operations are being conducted. A Zoning Administrator may terminate any such district when the reasons for said extension no longer apply.~~

~~Zoning ordinance, prohibiting drilling of wells on tracts recently included in residential zone not an unreasonable exercise of police power and does not deprive lessee which acquired lease prior to zoning of property without due process.
Marblehead Land Co. v. City of Los Angeles, 47 Fed. 2d 528.
Gromwell-Franklin Oil Co. v. Oklahoma City, 14 F.S. 370.
Beverly Oil Co. v. City of Los Angeles, 40 Cal. 2d 552.
Pacific Palisades Assn. v. City of Huntington Beach, 196 Cal. 211.~~

Section 16. Subsection K of Section 13.01 of the LAMC is amended as follows.

K. Maintenance of Drilling and Production Sites. ~~Effective August 1, 1962, t~~The following regulations shall apply to existing nonconforming ~~and future~~ oil wells within the City of Los Angeles, including oil wells operating pursuant to any zone variance, whether by ordinance or approval of a Zoning Administrator, and all oil wells in an M3 Zone which are within 500 feet of a more restrictive zone, until such uses are required to cease operations pursuant to LAMC Section 12.23 C.4:

1. All stationary drilling and service rigs ~~derrick~~s, including their floors and foundations, shall be removed within 30 days after completion or abandonment of the well (notwithstanding any other provisions of this Code to the contrary) ~~or by September 1, 1962, whichever occurs later; and thereafter any work done on any existing well which requires the use of a derrick shall be done by a temporary or portable derrick. Such temporary or portable derricks shall be removed within 30 days after the completion of such work.~~

2. The motors, engines, pumps and tanks of all such oil wells shall be sealed so that no offensive or obnoxious odor or fumes can be readily detected from any point on adjacent property.
3. The well pumping equipment for such wells shall be muffled or soundproofed so that the noise emanating therefrom, measured from any point on adjacent property, is no more audible than surrounding street traffic, commercial or industrial noises measured at the same point.
4. The maximum height of the pumping units for such wells shall not exceed 15 feet above existing grade level.
5. The site of such wells shall be so landscaped, fenced or concealed that the well and all of its appurtenant apparatus is reasonably protected against public entry, observation or attraction.

~~In addition to any other authority vested in the Zoning Administrator by Charter and the Los Angeles Municipal Code, a Zoning Administrator may waive or modify these regulations if the drilling site is physically inaccessible to a portable derrick, or is located in a mountainous and substantially uninhabited place, or is located in an M Zone and is surrounded by vacant land or is adjacent to land used as permitted in the M Zones and if the enforcement of such regulations would be discriminatory, unreasonable or would impose a undue hardship upon oil drilling in such locations. A Zoning Administrator may also waive or modify the 16-foot height limitation where, because of the amount of liquid to be raised or the depths at which such fluids are encountered, pumping unit in excess of 16 feet in height is shown by conclusive engineering evidence to be required.~~

~~All ordinances and parts of ordinances of the City of Los Angeles in conflict herewith are hereby repealed to the extent of such conflict.~~

EXHIBIT B

Official Council Action and Instruction

HOLLY L. WOLCOTT
CITY CLERK

City of Los Angeles
CALIFORNIA

OFFICE OF THE
CITY CLERK

PETTY F. SANTOS
EXECUTIVE OFFICER



ERIC GARCETTI
MAYOR

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
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PATRICE Y. LATTIMORE
DIVISION MANAGER
CLERK.LACITY.ORG

January 27, 2022

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

Council File No.: 17-0447

Council Meeting Date: January 26, 2022

Agenda Item No.: 24

Agenda Description: ENERGY, CLIMATE CHANGE, AND ENVIRONMENTAL JUSTICE (ECCEJ), PLANNING AND LAND USE MANAGEMENT (PLUM), AND BUDGET AND FINANCE COMMITTEES REPORTS relative to the feasibility of amending current City Land Use Codes in connection with health impacts at oil and gas wells and drill sites.

Council Action: BUDGET AND FINANCE COMMITTEE REPORT ADOPTED AS AMENDED BY MOTION (KREKORIAN – MARTINEZ) AND MOTION (MARTINEZ – PRICE – O'FARRELL – CEDILLO) FORTHWITH

Council Vote:

YES	Blumenfield	YES	Bonin	YES	Buscaino
YES	Cedillo	YES	de León	YES	Harris-Dawson
YES	Koretz	YES	Krekorian	YES	Lee
YES	Martinez	YES	O'Farrell	YES	Price
YES	Raman	YES	Rodriguez		

HOLLY L. WOLCOTT
CITY CLERK

Pursuant to Charter/Los Angeles Administrative Code Section(s): 4.133

FILE SENT TO MAYOR
LAST DAY FOR MAYOR TO ACT

01/27/2022
02/07/2022

APPROVED



1/27/2022

DATE SIGNED

Adopted Report(s) Title

Amending Motion (Martinez - Price - O'Farrell - Cedillo) dated 1-27-22

Motion (Krekorian-Martinez) dated 1-26-22

Report from Budget and Finance Committee_112221

BUDGET AND FINANCE COMMITTEE REPORT relative to the feasibility of amending current City Land Use Codes in connection with health impacts at oil and gas wells and grill sites.

Recommendations for Council action, SUBJECT TO THE APPROVAL OF THE MAYOR:

1. CONCUR with recommendations 4, 5, 6.a, and 9 from the Planning and Land Use Management Committee transmittal dated May 7, 2021, attached to the Council file.
2. INSTRUCT the Department of City Planning (DCP), with the assistance of the City Attorney, to prepare and present an Ordinance to prohibit new oil and gas extraction and make extraction activities a nonconforming use in all zones.
3. INSTRUCT the Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) to hire an expert to conduct an amortization study of drill sites in the city to determine an appropriate amortization period for existing wells.
4. INSTRUCT the OPNGAS, Climate Emergency Mobilization Office, and other relevant departments to participate in LA County's recently relaunched Just Transition Taskforce.
5. INSTRUCT the OPNGAS, in collaboration with the DCP and the Fire Department, to draft a new city policy to ensure proper plugging and abandonment of wells and comprehensive site remediation to be completed within 3-5 years of those sites ceasing active oil production, with the intention of ensuring oil companies bear the responsibility for abandonment and remediation. OPNGAS should identify which City Departments should play a role in oversight of site remediation and explore collaboration with the Los Angeles Regional Water Board, the California Geologic Energy Management Division, the South Coast Air Quality Management District, and the Los Angeles County Department of Public Health in this process.
6. ADD position authorities to DCP for one Senior Administrative Clerk, and one GIS Supervisor I, and six months funding from the "Amortization Study of Oil Sites" line item in the Unappropriated Balance for those positions as well as existing authorities for two City Planners and two City Planning Associates, for the purposes of supporting the Office of Zoning Administration (OZA) and Code Studies with the administration of zoning amendments and land use work related to the regulation of oil and gas

Fiscal Impact Statement: None submitted by the Board of Public Works. Neither the City Administrative Officer nor the Chief Legislative Analyst has completed a financial analysis of this report.

Community Impact Statement: Yes

For:

Silver Lake Neighborhood Council
Wilmington Neighborhood Council
Empowerment Congress North Area Neighborhood Development Council
Hollywood Studio District Neighborhood Council
Arroyo Seco Neighborhood Council
Northwest San Pedro Neighborhood Council
Rampart Village Neighborhood Council
Glassell Park Neighborhood Council
Venice Neighborhood Council
Greater Echo Park Elysian Neighborhood Council
Coastal San Pedro Neighborhood Council
Los Feliz Neighborhood Council
Van Nuys Neighborhood Council
North Hollywood Northeast Neighborhood Council
Tarzana Neighborhood Council

Park Mesa Heights Neighborhood Council
Eagle Rock Neighborhood Council
Community and Neighborhoods for Ninth District Unity Neighborhood Council
Atwater Village Neighborhood Council
Bel Air-Beverly Crest Neighborhood Council
Lake Balboa Neighborhood Council
Zapata-King Neighborhood Council
Northridge South Neighborhood Council
Encino Neighborhood Council
Boyle Heights Neighborhood Council
Palms Neighborhood Council
Hollywood United Neighborhood Council
Downtown Los Angeles Neighborhood Council
Central Hollywood Neighborhood Council
Westwood Neighborhood Council
West Adams Neighborhood Council
Mid-City West Neighborhood Council
Westside Neighborhood Council
Harbor Gateway North Neighborhood Council
Sunland-Tujunga Neighborhood Council
Sherman Oaks Neighborhood Council
South Robertson Neighborhood Council
Central San Pedro Neighborhood Council

For, if Amended:

Greater Valley Glen Neighborhood Council
Northridge East Neighborhood Council
Del Rey Neighborhood Council

Against, unless Amended:

Historic Highland Park Neighborhood Council

SUMMARY

At the meeting held on November 22, 2021, the Budget and Finance Committee considered a Joint Report from the Department of City Planning and the Board of Public Works (BPW), dated September 23, 2021, and BPW report, dated July 29, 2019, recommendations approved by the Energy, Climate Change, and Environmental Justice Committee on December 1, 2020, and recommendations approved by the Planning and Land Use Management (PLUM) Committee on April 20, 2021, all reports and transmittals attached to the Council file, relative to the feasibility of amending current City Land Use Codes in connection with health impacts at oil and gas wells and drill sites.

Representatives from the each department provided an overview and answered the questions of the Committee members. After an opportunity for public comment was held, the Committee moved to concur with the April 20, 2021 PLUM Committee recommendations as amended, as stated above. This matter is now forwarded to the Council for its consideration.

Respectfully Submitted,

BUDGET AND FINANCE COMMITTEE

<u>MEMBER</u>	<u>VOTE</u>
KREKORIAN	YES
BLUMENFIELD	YES
DE LEON	YES
RODRIGUEZ	ABSENT
PRICE	YES

-NOT OFFICIAL UNTIL COUNCIL ACTS-

EXHIBIT C

Mitigated Negative Declaration (ENV-2022-4865-MND) and Mitigation Monitoring Program

Oil and Gas Drilling Ordinance

Case Number: ENV-2022-4865-MND

Project Location: Citywide - Ordinance applicable within the boundaries of the City of Los Angeles, which encompasses approximately 465 square miles.

Community Plan Area: Citywide

Council District: Citywide

Project Description: The Project is a proposed Oil and Gas Drilling Ordinance (Oil Ordinance, Ordinance or Project) amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones within the City of Los Angeles (City). Specifically, the Ordinance amends the LAMC to (1) eliminate the provisions of the LAMC that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; (2) end by-right oil and gas extraction in the M3-Heavy Industrial Zones; (3) declare existing oil and gas extraction within the City a nonconforming use to terminate within 20 years; and (4) prohibit new or expanded oil and gas extraction activities (such as the drilling of new wells or the redrilling or deepening of existing wells). The Ordinance permits maintenance of the wells that the Zoning Administrator determines is necessary to protect public health, safety or the environment. The Ordinance exempts from its requirements wells that are operated by a public utility that is regulated by the California Public Utilities Commission. Twenty years from the effective date of the Ordinance, all nonconforming non-exempt oil and gas extraction uses will terminate.

PREPARED BY:

The City of Los Angeles
Department of City Planning

September 2022

INITIAL STUDY

TABLE OF CONTENTS

1	Introduction.....	1
1.1	Purpose of an Initial Study.....	1
1.2	Organization of the Initial Study.....	2
1.3	CEQA Process.....	2
2	Executive Summary.....	4
2.1	Other Public Agencies Whose Approval is Required.....	5
2.2	Environmental Factors Potentially Affected.....	5
2.3	Determination.....	5
2.4	Evaluation of Environmental Impacts.....	7
3	Project Description.....	9
3.1	Project Summary.....	9
3.2	Environmental Setting.....	9
3.3	Description of Project.....	20
3.4	Requested Permits and Approvals.....	32
4	Environmental Impact Analysis.....	33
I.	Aesthetics.....	33
II.	Agriculture and Forestry Resources.....	36
III.	Air Quality.....	37
IV.	Biological Resources.....	46
V.	Cultural Resources.....	49
VI.	Energy.....	53
VII.	Geology and Soils.....	55
VIII.	Greenhouse Gas Emissions.....	59
IX.	Hazards and Hazardous Materials.....	64
X.	Hydrology and Water Quality.....	72
XI.	Land Use and Planning.....	76
XII.	Mineral Resources.....	78
XIII.	Noise.....	80
XIV.	Population and Housing.....	87
XV.	Public Services.....	88
XVI.	Recreation.....	89
XVII.	Transportation.....	90
XVIII.	Tribal Cultural Resources.....	92
XIX.	Utilities and Service Systems.....	94
XX.	Wildfire.....	97
XXI.	Mandatory Findings of Significance.....	99
5	Conclusion.....	100

Appendices

A – Air Quality and Greenhouse Gas Technical Report

B – Noise and Vibration Technical Report

INITIAL STUDY

1 INTRODUCTION

This Initial Study (IS) document evaluates potential environmental effects resulting from the proposed Oil and Gas Drilling Ordinance amending the LAMC to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones (Oil Ordinance or Ordinance or Project). The Project is subject to the guidelines and regulations of the California Environmental Quality Act (CEQA). Therefore, this document has been prepared in compliance with the relevant provisions of CEQA and the *State CEQA Guidelines* as implemented by the City of Los Angeles (City). Based on the analysis provided within this Initial Study, the City has concluded that the Project can be mitigated to a less than significant level, resulting in the preparation of a Mitigated Negative Declaration. This Initial Study and Mitigated Negative Declaration are intended as informational documents and are ultimately required to be adopted by the decision maker prior to project approval by the City.

1.1 PURPOSE OF AN INITIAL STUDY

CEQA was enacted in 1970 with several basic purposes: (1) to inform governmental decision makers and the public about the potential significant environmental effects of proposed projects; (2) to identify ways that environmental damage can be avoided or significantly reduced; (3) to prevent significant, avoidable damage to the environment by requiring changes in projects through the use of feasible alternatives or mitigation measures; and (4) to disclose to the public the reasons behind a project's approval even if significant environmental effects are anticipated.

The City of Los Angeles is the lead agency for this Project. The Los Angeles City Council instructed the Department of City Planning (DCP) to prepare the Project. DCP has determined that the Project is subject to CEQA, and the preparation of an Initial Study is required.

An Initial Study is a preliminary analysis conducted by the Lead Agency, in consultation with other agencies (responsible or trustee agencies, as applicable), to determine whether there is substantial evidence that a project may have a significant effect on the environment. If the Initial Study concludes that the Project, even with mitigation, may have a significant effect on the environment, an Environmental Impact Report should be prepared; otherwise, the Lead Agency may adopt a Negative Declaration or a Mitigated Negative Declaration.

This Initial Study has been prepared in accordance with CEQA (Public Resources Code §21000 et seq.) and the *State CEQA Guidelines* (Title 14, California Code of Regulations, §15000 et seq.).

1.2 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into five sections as follows:

1. **Introduction:** Describes the purpose and content of the Initial Study and provides an overview of the CEQA process.
2. **Executive Summary:** Provides Project information, identifies key areas of environmental concern, and includes a determination whether the project may have a significant effect on the environment.
3. **Project Description:** Provides a description of the environmental setting and the Project, including project characteristics and a list of discretionary actions.
4. **Evaluation of Environmental Impacts:** Contains the completed Initial Study Checklist and discussion of the environmental factors that would be potentially affected by the Project.
5. **Conclusion:** Describes the overall findings of the Initial Study and recommends next steps.

1.3 CEQA PROCESS

In compliance with the *State CEQA Guidelines*, the City, as the Lead Agency for the Project, will provide opportunities for the public to participate in the environmental review process. As described below, throughout the CEQA process, an effort will be made to inform, contact, and solicit input on the Project from various government agencies and the general public, including stakeholders and other interested parties.

1.3.1 Initial Study Review Process

At the onset of the environmental review process, the City has prepared this Initial Study to determine if the Project may have a significant effect on the environment. This Initial Study determined that the Project does not have significant environmental impacts but will require mitigation measures to reduce impacts below a level of significance.

A Notice of Intent to Adopt a MND is provided to inform the general public, responsible agencies, trustee agencies, and the county clerk of the availability of the document and the locations where the document can be reviewed. A 30-day review period is identified to allow the public and agencies to review the document. The notice is mailed to any

interested parties and is noticed to the public through publication in a newspaper of general circulation.

The decision-making body then considers the MND, together with any comments received during the public-review process, and may adopt the MND and approve the project. In addition, when approving a project for which an MND has been prepared, the decision-making body must find that there is no substantial evidence that the project will have a significant effect on the environment, and that the MND reflects the lead agency's independent judgment and analysis.

INITIAL STUDY

2 EXECUTIVE SUMMARY

Project Title	Oil And Gas Drilling Ordinance
Environmental Case No.	ENV-2022-4865-MND
Related Cases	CPC-2022-4864-CA

Project Location	Citywide
Community Plan Area	Citywide
General Plan Designation	Varies
Zoning	Varies
Council District	Citywide

Lead Agency	City of Los Angeles
Staff Contact	Jennifer Torres
Address	200 N. Spring Street, Room 701 Los Angeles, California 90012
Phone Number	213-978-3094
Email	planning.oildrilling@lacity.org

Applicant	City of Los Angeles
Address	200 N. Spring Street, Room 701 Los Angeles, California 90012
Phone Number	213-978-3094

2.1 OTHER PUBLIC AGENCIES WHOSE APPROVAL IS REQUIRED

(e.g., permits, financing approval, or participation agreement)

None.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|---|--|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Transportation |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use / Planning | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology / Soils | <input type="checkbox"/> Population / Housing | <input type="checkbox"/> Mandatory Findings of Significance |
-

2.3 DETERMINATION

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Jennifer Torres

Planning Assistant

PRINTED NAME

TITLE



SIGNATURE

September 12, 2022

DATE

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analysis," as described in (5) below, may be cross referenced).
- 5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
- 6) Earlier Analysis Used. Identify and state where they are available for review.
 - a) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- b) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 7) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 8) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 9) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
- 10) The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance.

INITIAL STUDY

3 PROJECT DESCRIPTION

3.1 PROJECT SUMMARY

The Project is a proposed Oil and Gas Drilling Ordinance (Oil Ordinance or Ordinance or Project) amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones within the City of Los Angeles (City). Specifically, the Ordinance amends the LAMC to (1) eliminate the provisions of the LAMC that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; (2) end by-right oil and gas extraction in the M3-Heavy Industrial Zones; (3) declare existing oil and gas extraction within the City a nonconforming use to terminate within 20 years; and (4) prohibit new or expanded oil and gas extraction activities (such as the drilling of new wells or the redrilling or deepening of existing wells). The Ordinance permits maintenance of the wells that the Zoning Administrator determines is necessary to protect public health, safety or the environment. The Ordinance exempts from its requirements wells that are operated by a public utility that is regulated by the California Public Utilities Commission. Twenty years from the effective date of the Ordinance, all nonconforming oil and gas extraction uses will terminate.

3.2 ENVIRONMENTAL SETTING

For the purpose of CEQA, the analysis of potential environmental impacts from a “project” is based upon a comparison of the potential impacts of a project with the baseline. The baseline is generally the existing conditions at the time the City commences the environmental review of the project (*CEQA Guidelines* Section 15125(a)). The Ordinance’s allowance for any maintenance of wells that the Zoning Administrator determines is necessary to protect public health, safety or the environment will not change existing conditions, as these activities currently take place within the existing regulatory setting. The following provides a summary of the existing oil and gas extraction operations in the City and the regulatory framework governing these operations based upon data and information currently available.

3.2.1 Regulatory Framework

In the City, drilling sites and associated infrastructure are regulated by a variety of local, state, and federal agencies, which have their own distinct environmental monitoring and enforcement requirements as they relate to oil operations. The following describes the

primary regulatory requirements governing oil and gas extraction activities and the agencies tasked with the oversight of oil operations within the City.

A. Federal Regulatory Agencies

United States Environmental Protection Agency (EPA)

EPA is an agency of the United States federal government responsible for creating standards and laws that promote the health of individuals and the environment. The EPA regulates the manufacturing, processing, distribution, and use of chemicals and other pollutants and is charged with determining safe tolerance levels for chemicals and other pollutants in food, animal feed, and water. The EPA also runs programs to prevent, control, and respond to oil spills, control air pollution and forecast air pollution levels, and foster the manufacture of more fuel-efficient vehicles. The EPA works to enforce laws such as the Clean Air Act, the Safe Drinking Water Act, the National Environmental Education Act, and the Clean Water Act (CWA).

The Comprehensive Environmental Response Compensation, and Liability Act (CERCLA or Superfund) authorizes EPA to respond to releases, or threatened releases, of hazardous substances that might endanger public health, welfare, or the environment. It also grants EPA the authority to force parties responsible for environmental contamination to clean it up or to reimburse response costs incurred by EPA.

The Resource Conservation and Recovery Act (RCRA) is the federal public law that creates the framework for the proper management of hazardous and non-hazardous solid waste through the authority of the EPA.

With regard to the CWA, spill prevention, control and countermeasures (SPCC) regulations are designed to protect our nation's waters from oil pollution caused by oil spills that could reach the waters of the United States or adjoining shorelines. The section of the CWA regulations known as the "sheen rule" provides the framework for determining whether a facility or vessel responsible for an oil spill must report the spill to the federal government. The Oil Pollution Act (OPA) of 1990 amended the CWA, and provided new requirements for contingency planning by government and industry under the National Oil and Hazardous Substances Pollution Contingency Plan. OPA also increased penalties for regulatory non-compliance, broadened the response and enforcement authorities of the federal government, and preserved state authority to establish laws governing oil spill prevention and response.

Occupational Safety and Health Administration (OSHA)

The General Duty Clause of the OSH Act (the law that created OSHA) requires employers to provide workers with a safe workplace that does not have any recognized hazards that

cause or are likely to cause death or serious injury. Exposures to hazards present in the oil and gas well drilling, servicing, and storage industry are addressed in specific standards for general industry, including federal law 29 CFR 1926 for site preparation and 29 CFR 1910 for operations.

B. State Regulatory Agencies

California Geologic Energy Management Division (CalGEM)

CalGEM is one of five divisions that comprise the California Department of Conservation. CalGEM ensures the safe exploration and development of energy resources. It is the state agency responsible for issuance of well permits for production and injection wells, and oversees the drilling, operation, maintenance, and plugging and abandonment of oil, natural gas, and geothermal wells.

CalGEM responsibilities are detailed in Section 3000 of the California Public Resources Code and Title 14, Chapter 4 of the California Code of Regulations (CCR). These regulations address issues such as well spacing, blow-out prevention devices, casing requirements, plugging and abandonment of wells, maintenance of facilities and safety systems, fencing, inspection frequency, and reporting requirements. Section 1774 of Title 14 CCR Division 2, Chapter 4 specifies maintenance practices related to oil field facilities and pipelines.

California Air Resources Board (CARB)

CARB is the primary state agency responsible for actions to protect public health from the harmful effects of air pollution and developing programs and actions to fight climate change. CARB approves the regional Air Quality Management Plans for incorporation into the State Implementation Plan and is responsible for preparing those portions of the plan related to mobile source emissions. CARB implements the California Clean Air Act (CCAA) requirements, regulating emissions from motor vehicles and setting fuel standards. The CCAA established ambient air quality standards for ozone, PM10, PM2.5, CO, NO₂, SO₂, lead, visibility-reducing particles, sulfates, H₂S, and vinyl chloride. California standards are generally more stringent than the national standards.

Department of Toxic Substances Control (DTSC)

DTSC is a department of the California Environmental Protection Agency (CalEPA). DTSC protects the public health of communities and the environment from toxic contamination left behind from past industrial and commercial activities through its brownfields and environmental remediation programs under RCRA and CERCLA/Superfund, among other laws governing the cleanup of contaminated land, water, and air.

California State Water Resources Control Board

The State Water Board is housed within state government and is part of the CalEPA, and is tasked with protecting water quality by setting statewide policy, coordinating and supporting the Regional Board efforts, and reviewing petitions that contest Regional Board actions. Together with the regional boards, the State Water Board is authorized to implement the federal CWA in California. The State Water Board oversees certain well stimulation activities. The State Water Board is the lead on crude oil facilities, such as oil drill sites, that merit investigation for water contamination and remediation.

C. Regional Regulatory Agencies

California Regional Water Quality Control Board

There are nine regional water control boards statewide. Each regional board makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. The State Water Board and regional water boards do not permit oil and gas wells, but regional water boards do regulate oil and gas waste discharge ponds.

South Coast Air Quality Management District (SCAQMD)

The SCAQMD is the air pollution control agency for all of Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. The agency is responsible for controlling emissions primarily from stationary sources of air pollution and developing and enforcing emission control rules and regulations in the South Coast Air Basin and portions of the Salton Sea Air Basin and Mojave Desert Air Basin. By statute, SCAQMD is required to adopt an air quality management plan (AQMP) demonstrating compliance with all federal and state ambient air quality standards for the areas under the jurisdiction of the SCAQMD. Furthermore, SCAQMD must adopt rules and regulations that carry out the AQMP. The AQMP is a regional blueprint for how SCAQMD will achieve air quality standards and healthful air. The 2016 AQMP contained multiple goals promoting reductions of criteria air pollutants, greenhouse gases, and toxic air contaminants (TACs).

The SCAQMD also regulates oil and gas production equipment such as oil wells, flares, micro-turbines, gas separators, and other facility processing equipment. Under SCAQMD Rule 1148.2 (2013) - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers," onshore oil and gas well operators and chemical suppliers are required to electronically submit to the SCAQMD various types of reports related to well drilling, well completion, and well reworks.

SCAQMD Rule 1166 outlines safety requirements for excavation and ground disturbance on industrial and hazardous sites. Operators are required to obtain a Rule 1166 permit and follow all requirements which include handling rules for underground storage tanks, treatment of soil contaminated with volatile organic compounds, and debris/dust mitigation of potentially contaminated property soil. Operators must have a valid Rule 1166 permit throughout the duration of well abandonment and site decommissioning.

D. Local Regulatory Bodies in the City of Los Angeles

Department of City Planning

DCP is responsible for preparing, maintaining, and implementing a General Plan for the development of the City. The General Plan consists of the Framework Element, which provides overall guidance for the future of the City and other citywide elements including those that are State-mandated, including the Circulation, Noise, Housing, Open Space, Land Use, Conservation, and Safety elements.

DCP is also responsible for implementing the zoning code, which references oil and gas drilling and other related activities in LAMC Sections 12.03, 12.20, 12.23, 12.24, and 13.01.

Fire Department

The Los Angeles Fire Department (LAFD) is designated by the state of California as a Certified Unified Program Agency (CUPA) and is authorized to apply statewide standards to each facility within its jurisdiction that treats on site or generates hazardous waste, operates underground storage tanks, or stores hazardous materials. The LAFD Fire Prevention Bureau issues two types of permits to oil and gas well operators, including 1) a Division 4 Permit, an operational permit required to engage in the operation of an oil well and 2) an action permit for the drilling, re-drilling, or abandonment of an oil well.

Department of Building and Safety

The Los Angeles Department of Building and Safety (LADBS) provides permitting, plan check, inspection, and code enforcement services for residential and commercial buildings in the City. LADBS conducts inspections of oil and gas drill sites to ensure that construction and renovation work are completed properly. LADBS also enforces the required operating conditions for each established drill site.

Bureau of Sanitation, Watershed Protection Division

The City's Bureau of Sanitation, Watershed Protection Division (WPD) implements the Watershed Protection Program, which is intended to protect the beneficial uses of

receiving waters while complying with all flood control and pollution abandonment mandates. WPD enforces the City's Stormwater and Urban Runoff Pollution Control ordinance (LAMC Section 64.70) and responds to oil spills and environmental emergency events.

Los Angeles Department of Water and Power

The Los Angeles Department of Water and Power's (LADWP) oil and gas well oversight relates to groundwater and potential groundwater contamination. LADWP reviews and inspects methods regarding the drilling, production operations, and disposal of waste and can intervene to require changes when merited for the full protection of the public water supply (see LAMC 13.01).

Board of Public Works

The Petroleum Administrator serves as the Director of the City's Office of Petroleum and Natural Gas Administration and Safety Office under the Board of Public Works. Los Angeles Administrative Code (LAAC) Sections 19.48-19.50 address the duties of the Director with respect to the management of petroleum matters affecting the City. These include, but are not limited to, addressing all matters related directly or indirectly to petroleum exploration and production and any matters concerning the creation of oil well drilling districts under the LAMC. Sections 19.53-19.71 address duties including referrals, investigations of applications, consultation with experts, recommendations to decision makers, publications, conditions, award of leases or agreements, execution of leases, sureties, forfeitures, and reservations (subject to the State Lands Commission). The Petroleum Administrator is also responsible for the oversight of the City's pipeline franchise agreements.

3.2.2 Project Location

The Project is a citywide code amendment. The City has an approximate land area of 465 square miles (297,600 acres) with an estimated population of nearly 4.0 million residents (3,898,747), according to the 2020 Census. The City lies within Los Angeles County which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents (10,014,009), according to the 2020 Census. The City is divided into 15 Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

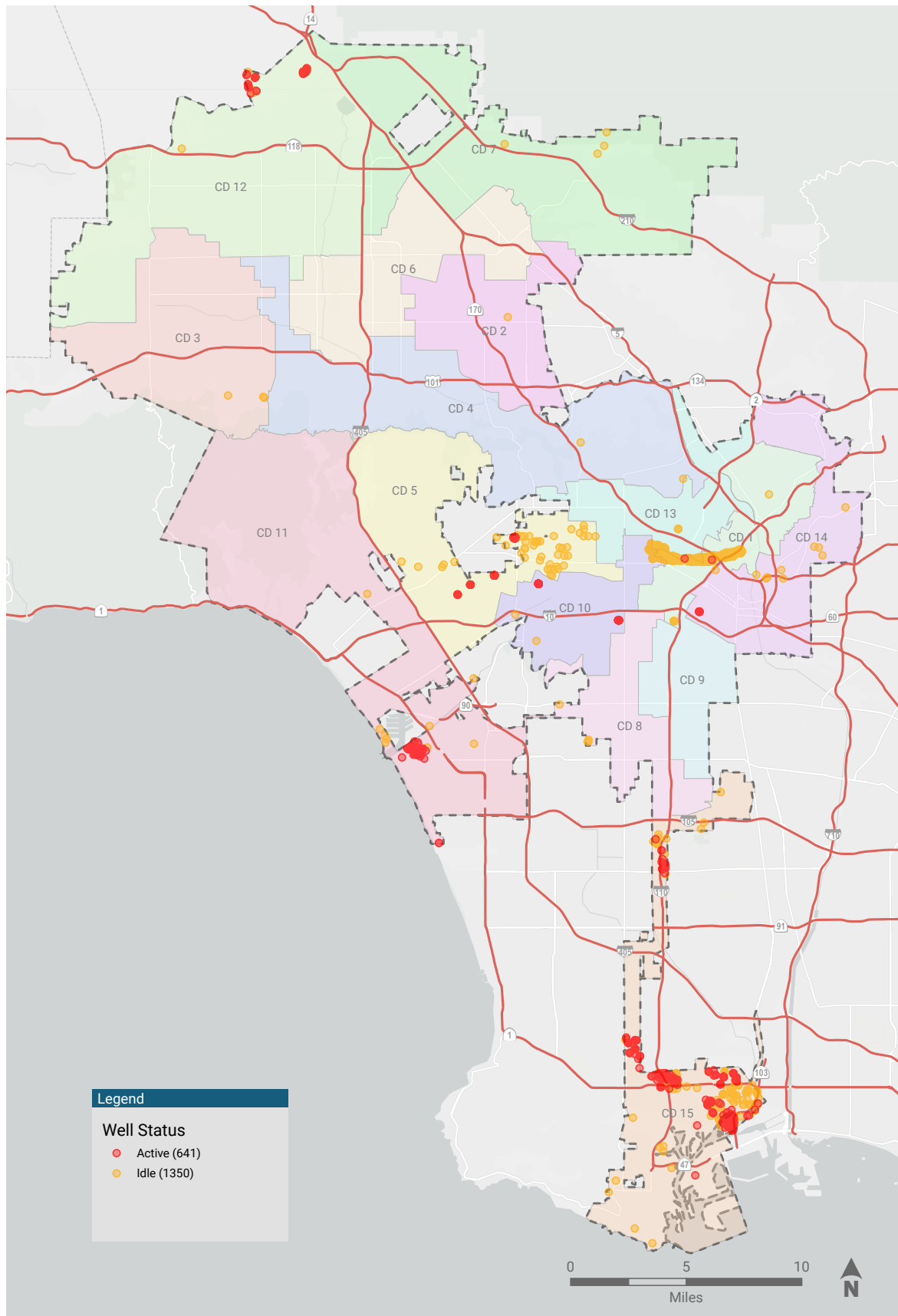
3.2.3 Existing Conditions

According to August 2022 data from CalGEM, the City has 26 oil and gas fields that intersect City boundaries and 5,273 oil and gas wells. There are approximately 641 active,

1,350 idle, 35 canceled, and 3,247 plugged wells.¹ Of the City's idle wells, as of July 2022, 56 are orphan wells deemed likely to have no responsible solvent operator. There are oil and gas facilities in nearly every section of the City.² See **Figure 1, Oil Well Locations Within the City**, and **Table 1, Oil Wells By Council District**. While some wells are situated in heavy industrial areas, others are located within residential neighborhoods and near community parks and schools. Much of the existing oil drilling and extraction is within underserved communities throughout the City. **Table 2, Oil Fields Within the City**, itemizes oil fields beneath the City, their time of discovery, and current status.

¹ An active well is an oil well that has been drilled and completed, an idle well is inactive and not producing, but capable of being reactivated, a canceled well is one where a well permit was canceled prior to drilling, and a plugged well has been plugged and sealed to current standards.

² There are two gas storage fields within the City, the Aliso Canyon and the Playa Del Rey Fields, which are both operated by the Southern California Gas Company (SoCalGas). SoCalGas is the primary operator of underground natural gas fields, natural gas storage wells, and natural gas transmission facilities within the City. No natural gas wells operated by public utilities would be impacted by the Ordinance.



SOURCE: City of Los Angeles, 2022

FIGURE 1

Table 1
Oil Wells By Council District

Council District	Active	Cancelled	Idle	Plugged	Total
1	2	0	622	300	924
2	0	0	1	3	4
3	0	0	3	2	5
4	0	0	2	3	5
5	103	2	101	514	720
6	0	0	0	11	11
7	0	0	4	28	32
8	0	0	4	47	51
9	0	0	0	10	10
10	71	4	82	76	233
11	38	1	12	335	386
12	43	2	6	87	138
13	0	0	217	41	258
14	12	1	25	52	90
15	372	25	271	1,738	2,406
Total	641	35	1,350	3,247	5,273

Source: City of Los Angeles, Department of City Planning and CalGEM, August 2022.

Table 2
Oil Fields Within the City

	Oil Field	Discovered	Status	Council District(s)
1	Aliso Canyon ^a	1938	Producing	12
2	Beverly Hills	1900	Producing	5, 10
3	Boyle Heights	1955	Abandoned	14
4	Cascade	1954	Producing	12
5	Cheviot Hills	1958	Producing	5
6	El Segundo	1935	Producing	11
7	Horse Meadows	1952	Abandoned	12
8	Hyperion	1944	Producing	11
9	Inglewood	1924	Producing	5, 8, 10
10	La Cienegas	1961	Producing	1, 8, 9, 10
11	Los Angeles City	1890	Producing	1, 13
12	Los Angeles Downtown	1965	Producing	9, 14
13	Mission	1961	Abandoned	12
14	Pacoima	1978	Abandoned	6, 7
15	Playa del Rey ^a	1929	Producing	11
16	Potrero	1928	Abandoned	11
17	Rosecrans	1927	Producing	15
18	Salt Lake	1902	Producing	4, 5
19	Salt Lake, South	1970	Producing	4, 5, 10
20	San Vicente	1968	Producing	5
21	Sawtelle	1965	Producing	5, 11
22	Torrance	1922	Producing	15
23	Union Station	1967	Abandoned	14
24	Venice Beach	1966	Abandoned	11
25	Wilmington	1932	Producing	15
26	Old Wilmington	1932	Abandoned	15

^a The Aliso Canyon and Playa Del Rey sites are former oil fields that are now gas storage facilities operated by the Southern California Gas Company and are not affected by the Project.

Source: City of Los Angeles, Office of Petroleum and Natural Gas Administration & Safety, Council File No. 17-0447 - Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019.

As shown in **Table 3, Oil & Gas Drill Sites**, there are 17 drill sites (sites where multiple wells are concentrated) throughout the City where oil and gas operations occur. There are also nine abandoned drill sites in the City. As of 2019, approximately 67 percent of oil and gas wells are within drill sites.³ The remaining wells are dispersed throughout the City in urban and rural locations.

**Table 3
Oil & Gas Drill Sites**

	Oil & Gas Drill Site	Council District
1	AllenCo	1
2	Jefferson	8
3	Murphy	10
4	West Pico	5
5	Rancho Park Golf Course	5
6	Hillcrest Country Club	5
7	San Vicente	5
8	Packard	10
9	Mission Visco	12
10	Aliso Canyon	12
11	Filipino Town	13
12	Echo Park	13
13	Broadway	14
14	Harbor Gateway 1	15
15	Harbor Gateway 2	15
16	Joughin	15
17	Banning/Warren E&P	15

Source: City of Los Angeles, Department of City Planning and CalGEM, August 2022.

³ City of Los Angeles, Office of Petroleum and Natural Gas Administration & Safety, Council File No. 17-0447 - Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019.

Wells are found in nearly all parts of the City, including, but not limited to, the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando Valley. While some wells are situated in heavy industrial areas, others are located in neighborhoods within close proximity to residences, schools, and other sensitive uses. Based upon information currently available to the City, approximately 1,410 wells are within 50 feet and 2,112 wells are within 100 feet of sensitive land uses identified as residences, schools, parks, daycares, nursing homes, or hospitals. For a list of sensitive receptors located in proximity to wells throughout the City, please refer to the Air Quality & Greenhouse Gas Technical Report (**Appendix A** to this Initial Study) and the Noise & Vibration Technical Report (**Appendix B** to this Initial Study).

In 2017, the average daily crude oil production rate from within the City was estimated to be 7,600 to 8,000 barrels of oil per day (BOPD).⁴ The standard volumetric measurement of a barrel of crude oil is forty-two (42) gallons. The annual cumulative oil production in 2017 was equivalent to 2.5 million barrels (bbl) of oil.⁵ Oil and gas production in the City represents approximately two percent of the state's total production.⁶

3.3 DESCRIPTION OF PROJECT

3.3.1 Project Background & Overview

The Los Angeles geological basin has one of the highest concentrations of crude oil per acre in the world. There are thousands of feet of oil-bearing sandstone rock formations underlying the City and the surrounding areas in Orange and Los Angeles Counties. In 1892, Edward Doheny and Charles Canfield drilled the first successful oil well in the Los Angeles City Oil Field (modern day Echo Park). Their discovery set off a series of major oil discoveries in the early 1900s and led to the City's first major population boom.⁷

By the 1930s, California was producing nearly one-quarter of the world's oil output. Oil extraction activities played a key part in Los Angeles' industrialization and growth over the ensuing decades. Today, Los Angeles is one of the largest urban oil fields in the

⁴ City of Los Angeles, Department of Public Works Office of the Petroleum and Natural Gas Administration and Safety. Oil and Gas Health Report, 2019. http://clkrep.lacity.org/online/docs/2017/17-0447_pc_b_10-15-19.pdf, accessed September 12, 2022.

⁵ David Rigby and Michael Shin. The Oil and Gas Extraction Sector in the City of Los Angeles. October 2017. Available online at: https://clkrep.lacity.org/online/docs/2017/17-0447_misc_81A_07-29-2019.pdf, accessed September 12, 2022.

⁶ City of Los Angeles, Office of Petroleum and Natural Gas Administration & Safety. Oil & Gas Health Report. 2019. Available online at: http://clkrep.lacity.org/online/docs/2017/17-0447_pc_b_10-15-19.pdf, accessed September 12, 2022.

⁷ City of Los Angeles, Office of Petroleum and Natural Gas Administration & Safety, Council File No. 17-0447 - Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019.

country, with drill sites and oil wells found in nearly all parts of the City, including, but not limited to, the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando Valley.

Oil and natural gas extraction is known as an upstream process because it includes the extraction and initial separation of oil, water and natural gas from hydrocarbon formations, but not the subsequent transportation, processing and storage (midstream) or the refining of petroleum or marketing and use of petroleum products (downstream). An upstream oil and natural gas producer sells the oil from the field where it is produced to a midstream pipeline company which transports oil and natural gas to downstream companies that operate refineries (or natural gas to utilities to operate power plants, and to natural gas storage and distribution facilities). These different activities are conducted by specialized companies and governed by sector-specific regulations. Upstream oil and natural gas extraction is thus distinct in terms of both operations and regulations from midstream pipeline companies, downstream refining and marketing companies and utilities that operate natural gas storage facilities and power plants that sell natural gas and electricity. The activities addressed by the ordinance are limited to upstream activities.

Petroleum production in most fields in the City and most of the Los Angeles Basin has several natural characteristics that are distinct to each field's specific geometry, depth, sulfur content and production volume. Oil and natural gas wells in the City are distinguished by their low pressures and low flow rates. These facilities also typically hold small fluid volumes, since the oil is generally sent directly by pipeline to local refineries. In addition, the gas-to-oil ratio⁸ is very low in the Los Angeles Basin, which means that it is typically less volatile and generates lower air emissions of methane and volatile organic compounds. The water to oil ratio⁹ is very high in Los Angeles, which means that the vast majority of the fluid produced is water rather than oil or gas. After the oil is separated, the water is either disposed of via a local sanitation district or re-injected into the subsurface formation.

Although oil production was a defining feature of Los Angeles' early development, this is no longer the case. The need to prioritize Angelenos' health and safety and keep up with national and statewide efforts to become energy efficient and independent led to a 2017 motion (CF-17-0447)¹⁰ to the Council. The motion directed DCP, with the assistance of the City Attorney and the Petroleum Administrator, to provide a comprehensive analysis regarding possible implementation of changes to the City's land use codes relative to oil and gas development. The motion included consideration of no oil or gas wells to be

⁸ The gas to oil ratio is a measure of the natural gas content in the produced fluid from the formation

⁹ The water to oil ratio is a measure of the water content in the production fluid.

¹⁰ City of Los Angeles Department of City Planning, Health, Mental Health, and Education Committee. Motion CF-17-0447. August 2017. Available online: https://clkrep.lacity.org/online/docs/2017/17-0447_mot_04-19-2017.pdf

located within a certain setback from sensitive uses, essentially by making those wells nonconforming uses. Secondly, the motion included a directive to prepare an amortization period to determine the way nonconforming wells could be phased out of operation. The purpose of the motion was to address health risk concern associated with oil and gas development within urban areas, with the concern that the closer oil and gas wells are to sensitive uses, the higher the risk.

The Board of Public Works issued a report on July 29, 2019, regarding the feasibility of amending the current land use codes for oil wells and drill sites. The report largely focused on creating setbacks from sensitive uses. On December 20, 2020, the item was heard before the Energy, Climate Change, and Environmental Justice (ECCEJ) Committee. The Committee introduced a modified approach that would instead make all neighborhood oil and gas drilling in the City a nonconforming use, regardless of the proximity to sensitive receptors. On April 20, 2021, the Planning and Land Use Management (PLUM) Committee considered and concurred with ECCEJ's recommendations and added additional instructions to the initial recommendations. Several of the instructions were referred to DCP and the Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) to report back with a comprehensive analysis regarding the possible changes to the City's land use codes relative to oil and gas development as well as to report on the necessary budget and staff needs to further address oil wells in urban residential neighborhoods in the City. The Committee emphasized the need to address health impacts from oil and gas drilling on disadvantaged neighborhoods.

After the motion was heard in Budget and Finance, on January 26, 2022,¹¹ the City Council directed DCP, with the assistance of City Attorney, to prepare and present an ordinance to prohibit new oil and gas extraction and make extraction activities a nonconforming use in all zones. Pursuant to the City Council directive, DCP drafted a proposed citywide ordinance that would prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones.

At the direction of City Council, the City's Petroleum Administrator and OPNGAS conducted an extensive inventory of oil and gas facilities within the City, participated in public hearings, collected historical records from multiple private and public databases, synthesized thousands of pages of technical reports, and retained a consultant to study the potential health impacts of oil and gas wells and drill sites within the City. The findings of the report, which are in CF17-0447, show that activities related to oil and gas operations have been associated with many potential negative health and safety impacts, especially when they occur in close proximity to sensitive uses, such as residences, schools, or

¹¹ City of Los Angeles. Budget and Finance Committee Report. November 2021. File No. 17-0447. Available online: [https://clkrep.lacity.org/online/docs/2017/17-0447_misc_BF_112221_vF3%20\(2\).pdf](https://clkrep.lacity.org/online/docs/2017/17-0447_misc_BF_112221_vF3%20(2).pdf)

parks.¹² Consistent with the City’s policies on climate change (i.e., L.A.’s Green New Deal, Sustainable City pLAn,¹³ and the City’s Health, Wellness and Equity Element of the General Plan “Plan for a Healthy Los Angeles”¹⁴), Los Angeles is introducing regulations that would phase out oil activities altogether. Many of these plans and policies encourage reduction in oil usage, generation of green energy, expansion of electrical infrastructure and acknowledgement of environmental justice issues. **Table 4, City Policies Supporting the Oil and Gas Ordinance**, and **Table 5, Regional and State Policies Supporting the Oil and Gas Ordinance**, provide a summary of policies with which the Project is consistent. Policies are generally grouped according to CEQA topic area.

Table 4
City Policies Supporting the Oil and Gas Ordinance

Aesthetics	
West Adams-Baldwin Hills-Leimert Community Plan	LU75-6 Mitigation of Impacts. Encourage adequate mitigation of noise, odor, glare, vibration, and aesthetic impacts. Support efforts to discourage continuous around-the-clock drilling.
Harbor Gateway Community Plan	Oil wells should be landscaped and maintained in an attractive condition, especially where adjacent to residential uses.
Air Quality	
Air Quality Element	4.1.1 Coordinate with all appropriate regional agencies the implementation of strategies for the integration of land use, transportation, and air quality policies
	5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations
	5.3.1 Support the development and use of equipment powered by electric or low-emitting fuels
A Plan for a Healthy Los Angeles	5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
	5.2 Reduce negative health impacts for people who live and work in close proximity to industrial uses and freeways through health promoting land uses and design solutions.
	5.4 Protect communities’ health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.
	5.7 5.7 Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and others susceptible to respiratory diseases.
Safety Element	1.2.8 Industrial Emissions and Air Quality Monitoring. In keeping with the Air Quality Element, ensure that every Angeleno can breathe clean, healthy air by addressing air pollution from all sources, with a particular emphasis on prioritizing the health and wellbeing of overburdened families and delivering environmental justice.

¹² Council File No 17-0447 – Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil and Gas Wells and Drill Sites, July 29, 2019. Report from the Petroleum Administrator to the City Council.

¹³ Available on the City’s website at: https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf

¹⁴ Available on the City’s website at: https://planning.lacity.org/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf

L.A.'s Green New Deal	Implement and expand the Clean Up Green Up program to include one or more additional neighborhoods with high CalEnviroScreen scores
	Conduct fence-line air quality monitoring at L.A.'s refineries and oil and gas extraction sites
	Identify and analyze toxic air contaminants emitted from oil and gas production facilities
	Improve tracking for flaring emissions and create transparent database of air quality impacts
Energy	
Conservation Element	Policy 1: continue to encourage energy conservation and petroleum product reuse. Policy 3: continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas (renamed Geologic Energy Management) requirements
Safety Element	1.2.2 Renewable Energy. Aggressively pursue renewable energy sources, transitioning away from fossil-based sources of energy and toward 100% renewable energy sources.
	1.2.12 Prosperity and Green Jobs. Leverage investments in green infrastructure and systems to create inclusive economic opportunities for the city's workforce.
L.A.'s Green New Deal	Launch a new Virtual Net Energy Metering pilot program for multi-family households to go solar and implement a feasibility study to scale up program
	Provide community solar programs that expand access to solar savings to low-income and renter households: 1) Solar rooftops and 2) Shared solar program
	Engage 100% Renewable Energy Advisory Group on study inputs and partner on public outreach
	Increase cumulative MW of energy storage to 1,428-1,524 MW
	Launch residential thermostat demand response (DR) program, and increase cumulative MW of DR to 96 MW
	Create working group to prioritize and execute local air quality mitigation steps in highly impacted neighborhoods
	Install 15 MW of solar at the Port
	Install 3 MW of solar at City facilities
Greenhouse Gas Emissions	
West Adams-Baldwin Hills-Leimert Community Plan	CF20-5 Reduce Greenhouse Gas Emissions. Support efforts to promote the use of clean, renewable energy that is diverse in technology and location to decrease dependence on fossil fuels, reduce emissions of greenhouse gases, and increase the reliability of the power supply. (P143)
L.A.'s Green New Deal	Reduce fugitive and vented emissions of methane from new and existing oil and gas facilities through improved monitoring
Hazards and Hazardous Materials	
West Adams-Baldwin Hills-Leimert Community Plan	LU75-2 Periodic Review. Encourage regular and periodic discretionary review of any extraction activities involving hazardous materials.
	LU75-3 Community Health. Recommend that any extraction technology, including fracking, acidizing, or other technologies that involve potentially hazardous materials, has no negative impacts on public or environmental health. Support comprehensive plans, which strive to stop the release of chemicals from extraction sites into the groundwater or the surrounding environment.
	LU75-5 Hazardous Materials. Recommend that any decisions to approve the transportation or use of hazardous materials are based on sound understanding of potential public health impacts, and that adequate study and analysis has been conducted and demonstrated as part of the decision-making record.

Conservation Element	Policy 3: continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction and transport operations, consistent with California Department of Conservation, Division of Oil and Gas (renamed Geologic Energy Management Division) requirements.
Safety Element	1.1.4 Health/Environmental Protection. Protect the public and workers from the release of hazardous materials and protect City water supplies and resources from contamination resulting from release or intrusion resulting from a disaster event, including protection of the environment and public from potential health and safety hazards associated with program implementation.
	1.2.1 Environmental Justice. In keeping with the Plan for a Healthy LA, build a fair, just and prosperous city where everyone experiences the benefits of a sustainable future by correcting the long running disproportionate impact of environmental burdens faced by low income families and communities of color.
	Program # 6 Identify, Analyze, and Mitigate Local Oil and Gas Risks.
L.A.'s Green New Deal	Enhance health and safety protection provisions for oil and gas production facilities
Land Use and Planning	
West Adams-Baldwin Hills-Leimert Community Plan	LU65-2 Capitalize on Emerging Industrial Sectors Capitalize on rehabilitation and adaptive reuse of existing structures, as well as the introduction of contextual new infill construction in areas such as the Hyde Park Industrial Corridor. Provide land use incentives and standards that facilitate the generation of high wage jobs and training for the community especially within the growing "clean-tech" and "greentech" sectors. (P13, P33, P286)
Wilmington Harbor City Community Plan	1-6.1 The enlargement of nonconforming, incompatible commercial and industrial uses within areas designated on the Plan map for residential land use shall be prohibited, and action shall be taken toward their removal on a scheduled basis in conformance with Section 12.23 of the Municipal Code.
	3-5.4 Seek the consolidation of surface oil extraction operations to free land for other uses, where feasible, to increase compatibility between oil operations and other land uses
L.A.'s Green New Deal	Evaluate the feasibility of a no drill health and safety buffer zone between oil and gas production facilities and communities
Mineral Resources	
West Adams-Baldwin Hills-Leimert Community Plan	LU75-1 Discretionary Review. Seek a high level of discretionary review for any changes to, or expansion of, existing oil extraction sites and activities so that the public may remain informed and involved, and so that appropriate environmental review may take place pursuant to the California Environmental Quality Act.
Wilmington Harbor City Community Plan	3-5.1 Regulate oil extraction activities and facilities in such a manner to enhance their compatibility with the surrounding community.
	3-5.3 Require, after January 1, 2000, that all drilling sites and oil production activities comply with the rules and regulations pertaining to urbanized areas. Alternatively, in the case of drilling sites and other oil production activities within a previously established drilling district, such sites and activities shall comply by January 1, 2000 with an Ordinance to be initiated which will (a) govern the maintenance and landscaping of drilling sites and other oil production activities; and (b) provide a program for the abandonment of drilling sites that no longer serve a useful function.
Conservation Element	Policy 2: continue to support state and federal bans on drilling in the Santa Monica Bay and on new drilling along the California coast in order to protect the San Pedro and Santa Monica bays from potential spills associated with drilling, extraction and transport operations.
L.A.'s Green New Deal	Reduce oil production by 40% below 2013 levels
	Coordinate with L.A. County to develop a sunset strategy for oil and gas production operations countywide
	Evaluate waste to energy technologies and conversion technology pilot projects to replace flares at oil drill sites; e.g., Micro Turbines

	Develop an inter-agency Task Force to update City processes for inspections and permitting of oil and gas extraction facilities
	Reduce oil production by 40% below 2013 levels
	Coordinate with L.A. County to develop a sunset strategy for oil and gas production operations countywide
	Develop an auditing and tracking program for oil and gas wells throughout the City
	Improve tracking for emissions from imported oil and gas
Transportation	
West Adams-Baldwin Hills-Leimert Community Plan	M12-3 Priority Parking for Alternative Fuel Vehicles. Encourage new commercial and retail developments to provide prioritized parking for shared vehicles, electric vehicles and vehicles using alternative fuels. (P209)
	M12-4 Connections for Electric Vehicles. Encourage new construction to include vehicle access to properly wired outdoor receptacles to accommodate zero emission vehicles and plug-in electric hybrids. (P109)
Harbor Gateway Community Plan	Improved bus service should be provided to more directly connect the various commercial, residential and industrial areas of this and adjacent communities.
Wilmington Harbor City Community Plan	1-2.1 Locate higher residential densities near commercial centers and major transit routes, where public service facilities, utilities, and topography will accommodate this development.
	Objective 10-1 To encourage improved local and express bus service through the Wilmington Harbor City community, and encourage park-and-ride facilities to interface with freeways, high occupancy vehicle (HOV) facilities, and transit routes.
	Objective 11-1 To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length, and reduce the number of vehicle trips
Safety Element	1.2.7 Zero Emissions Vehicles. In keeping with the Mobility Plan, work toward zero emissions transportation and goods movement and increase zero emissions infrastructure including charging.
L.A.'s Green New Deal	Support development of cleaner rail transport, including investigating the feasibility of rail electrification
	Implement an updated Clean Truck Program with prioritization of zero emission trucks
	Ensure that municipally deployed EV chargers are distributed equitably around the city, with a focus on underserved and disadvantaged neighborhoods
	Update the Transportation Demand Management (TDM) ordinance
	Distribute 1,000 used electric vehicle (EV) rebates, 11,500 Level 2 EV charger rebates, and 75 DC fast charger rebates
	Develop roadmap for Fossil Fuel Free Zone by 2021; and implement by 2030
	100% Zero Emission school buses in Los Angeles
	100% of urban delivery vehicles are zero emission
	Electrify LA Metro's Orange and Silver Lines
	Electrify 100% of paratransit shuttle buses
	Expand the use of shore power (AMP) or other emissions capturing technologies to 100% of ships as part of a suite of emissions reductions programs for ocean going vessels
	100% zero emission cargo handling equipment
	100% zero emissions on-road drayage trucks

Utilities and Service Systems	
L.A.'s Green New Deal	Make key upgrades to transmission and distribution systems, substations, and other equipment to enable renewable energy integration into the electricity grid
	Utilize transmission access from Intermountain Power Plant as a renewables hub, enabling over a gigawatt of renewable resources over the next 15 years
	Partner with local utilities and the LA2028 Olympic and Paralympic Organizing Committee to develop a clean energy plan
	Cancel plans to repower OTC gas power plants and cut in-basin power generation by natural gas 38%
	Provide community solar programs that expand access to solar savings to low income and renter households: 1) Solar rooftops and 2) Shared solar program
	Launch a new Virtual Net Energy Metering pilot program for multifamily households to go solar and implement feasibility study
	Require all newly built parking structures to have solar
	Expand Feed-in-Tariff (FiT), community solar, and increase cumulative MW of local solar to 500 MW

Table 5
Regional and State Policies Supporting the Oil and Gas Ordinance

Air Quality	
SCAG Connect SoCal	Goal 6. Support healthy and equitable communities
SCAQMD AQMP	EGM-01 Emission Reductions from New Development and Redevelopment
	EGM-03 Emission Reductions from Clean Construction Policy
	MOB-02A Emission Reductions at New Rail Yards and Intermodal Facilities
	MOB-05 Accelerated Retirement of Older Light-Duty and Medium-Duty Vehicles
	MOB-06 Accelerated Retirement of Older On-Road Heavy-Duty Vehicles
	Advanced Clean Fleets Regulation
	Zero Emissions Trucks Measure
	On-Road Motorcycle New Emissions Standards
	Clean Miles Standard
	Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation
	Clean Off-Road Fleet Recognition Program
	Cleaner Fuel and Visit Requirements for Aviation
	Cleaner Fuel and Vessel Requirements for Ocean-Going Vessels

Public Health Rulemaking	CalGEM will not approve any Notice of Intention to drill a new well with a new surface location within the setback exclusion area (3,200 of a sensitive receptor), except a well, such as an intercept well or a pressure relief well, that must be drilled to alleviate an immediate threat to public health and safety or the environment.
Greenhouse Gas Emissions	
2022 CARB Scoping Plan	Deploy ZEVs and reduce driving demand
	Coordinate supply of liquid fossil fuels with declining California fuel demand
	Decarbonize industrial energy supply
	Decarbonize buildings
	Reduce noncombustion emissions
Transportation	
SCAG Connect SoCal	Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
Utilities and Service Systems	
2022 CARB Scoping Plan	Generate clean electricity

Proposed Project

The Project is a proposed ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to (1) eliminate the provisions of the LAMC that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; (2) end by-right oil and gas extraction in the M3-Heavy Industrial Zones; (3) declare existing oil and gas extraction within the City a nonconforming use to terminate within 20 years; and (4) prohibit new or expanded oil and gas extraction activities (such as the drilling of new wells or the redrilling or deepening of existing wells). The Ordinance permits maintenance of the wells that the Zoning Administrator determines is necessary to protect public health, safety or the environment. Twenty years from the effective date of the Ordinance, all nonconforming oil and gas extraction uses will terminate.

This Ordinance is not applicable to (1) common carrier oil pipelines intended for regionally-coordinated transport of hydrocarbons; (2) service stations or like uses; (3) refineries; and (4) oil and injection wells that are verified to be plugged and abandoned in accordance with all applicable local, state, and federal laws, rules and regulations, including the California Statutes and Regulations overseen by the California Geologic Energy Management division (CalGEM), and LAFD and for which the well pad has been restored suitably for its subsequent use, and (5) any well operated by a public utility

regulated by the California Public Utilities Commission, including those operating at the Aliso Canyon and Playa Del Rey Gas Storage Fields.

The Ordinance does not set a specific timetable for the closure and abandonment of wells, regulate the abandonment of oil wells that have permanently ceased operation, or mandate or regulate the remediation of well sites where extraction has terminated permanently.¹⁵

3.3.2 Analysis & Assumptions

The Ordinance will make existing oil and gas drilling operations legally nonconforming uses in the City, subject to a 20-year amortization period. Existing oil and gas extraction activities may continue to operate until the end of the amortization period after which time all drilling-related activities must cease. After a well ceases operation, current regulations require that the well be abandoned and plugged. However, the current regulations do not establish a set time period by which the abandonment process must be completed after a well ceases operation. As stated above, the Ordinance does not regulate abandonment when well operations permanently cease.

Currently it is unknown as to how many oil wells will permanently cease operations prior to the 20 year expiration date. This is because the time period that each of the City's approximately 1,991 active and idle wells will permanently cease extraction and undergo abandonment depends on a number of individual factors. For example, once the Ordinance becomes effective, some operators may choose to conclude operations immediately, others may continue to operate until the end of the 20-year amortization period. However, once a well permanently ceases operation, there is a financial and economic incentive for the oil well operator to complete the abandonment process to reduce the costs of maintaining the well site. Therefore, because there is no reasonable way to accurately predict the timeline for cessation and abandonment at the individual level, this analysis instead assumes all oil drilling will cease 20 years from the effective date of the Ordinance as required. Abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe.

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated above, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. When a well

¹⁵ Public Resources Code Section 21000 requires that a lead agency identify all feasible mitigation measures that will avoid or substantially lessen the significant environmental effects of the project. This MND identifies areas of potentially significant impacts that would occur as a result of abandonment activities (See Noise, Hazards, Geology and Soils). In accordance with CEQA, mitigation measures are proposed where such impacts could be reduced to less than significant by their imposition.

permanently stops operating, termination and abandonment activities will generally include (1) the cessation of production and drilling operations; (2) the closure and plugging of all oil and gas wells, including water flooding injection wells, except injection wells as permitted and demonstrated to be active and necessary by CalGEM; and (3) the plugging/capping of subsurface pipelines. Neither implementation of the Ordinance nor the oil well abandonment process should require excavation of previously undisturbed land and no new permanent structures would be constructed as part of the Project.

Termination activities of nonconforming oil and gas extraction must adhere to all applicable local, state, and federal laws, regulations, rules and standards, including the California Statutes and Regulations and all other requirements overseen by CalGEM as the principal regulatory authority for the closure of oil and gas extraction and production sites. Termination and abandonment activities will occur within previously disturbed and developed areas of the properties that encompass oil and gas extraction activities. In some cases, new access points may be necessary to allow for ingress/egress of equipment necessary to complete the abandonment of wells. However, no new permanent roads or permanent changes to existing roads would be necessary as part of the Project.

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.¹⁶ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. CalGEM conducts inspections at certain milestones for this scope of work, including the following:

¹⁶ When a drilling or maintenance rig is not already on the well site, a rig will need to be brought to the site to complete the abandonment process.

- Operators conduct a series of pressure tests on the wells to identify that there are no leaks or that the pressure is unsafe to work on the well. A test to measure any levels of hydrogen sulfide is common.
- Operators use a drilling or maintenance rig to work on the well and prepare blowout prevention equipment for the well that will be plugged.
- CalGEM inspects the blowout prevention equipment to ensure that it is safe for the operator to continue with plugging and abandonment work.
- Operators use the rig to pull out various cables, tubing, and other connections from the well casing.
- Operators may require the use of brine water to clean out different segments of the well. If no debris or sand is observed, then the operators continue using the rig to remove cables, tubing, and more connections from the well.
- After the operator has removed the sufficient amount of tubings, casing, and connections and there are minimal amounts of debris observed, then the operator will bring a cement truck to begin pouring fresh water and cement mix down the well. CalGEM is required to observe this first segment of pouring as the inspector is looking to observe that the bottom hole is filled with the appropriate amount of cement.
- The operator continues to remove casings and tubings with support of the rig while also pouring cement down the well at depths deemed safe and clear enough to pour cement. Pressure testing of the well is frequently conducted to identify any safety risks.
- As the work nears the top segment of the well, the operator continues to use the rig and cement trucks are brought to the drill site to fill the well with cement. The ending segment can include up to 600 cubic feet of cement into the well's casings in order to displace any well fluids or debris. The operator will fill the well casing to the near very top and this process is observed by CalGEM and by the Los Angeles Fire Department.
- At the conclusion, the operator removes any blowout prevention equipment from the rig and the well is closed and steel welded with the API Number and the LAFD Well Number identified on the top cover.

Given the varied timeline of individual well abandonment and the fact the Ordinance does not establish any regulations related to well site remediation or redevelopment (except where mitigation measures are required to reduce identified potentially significant

impacts), it would be speculative to contemplate when site remediation would occur after the wells are abandoned and the types of redevelopment and future land uses that may occur on former drill sites. What might get built and at what intensity or scale is not possible to identify or analyze at this time. Therefore, the scope of analysis in this Initial Study is limited to (1) cessation of oil and gas extraction in the city and (2) abandonment activities that are reasonably foreseeable. The analysis does not examine impacts from remediation and/or future development. Those impacts would be analyzed in subsequent environmental analyses at either the programmatic or project level.

Methodology

The City's method assumes that well operations will cease in accordance with the requirements of the Ordinance and that the abandonment of oil wells that permanently cease operations is a reasonably foreseeable outcome. Furthermore, the methodology is based upon the fact the well abandonment activities will comply with existing federal, state and local laws, ordinances and regulations. To date, there is no specified timeline for the abandonment of wells, as operators could continue to operate through the 20-year amortization period.

Additionally, the City is not modifying its existing land use plans and is making limited amendments to its zoning code to make oil drilling a non-conforming use. The reasonably foreseeable result of this ordinance is the abandonment of wells, but not the redevelopment of any well sites, as such analysis of future land uses would be speculative.

While this environmental document appropriately presents a program level analysis, specific assumptions were made regarding the methods for well abandonment based on case studies, and other information made available to the City regarding the well abandonment process. As such, this analysis represents a good faith effort by the City to analyze the reasonably foreseeable environmental impacts resulting from the adoption and implementation of the proposed Ordinance. Detailed assumptions are provided in the Air Quality and Greenhouse Gas Technical Report and the Noise and Vibration Technical Report which are included as appendices to this Initial Study.

3.4 REQUESTED PERMITS AND APPROVALS

The Initial Study will analyze impacts associated with the Project and will provide environmental review sufficient for all necessary entitlements and public agency actions associated with the Project. The discretionary entitlements, reviews, permits and approvals required to implement the Project include, but are not necessarily limited to, an amendment to the Zoning Code, in accordance with City Charter Section 558 and LAMC Section 12.32, that will create the Oil and Gas Drilling Ordinance.

INITIAL STUDY

4 ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Except as provided in Public Resources Code Section 21099, would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Have a substantial adverse effect on a scenic vista? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

a) Have a substantial adverse effect on a scenic vista?

No Impact.

The Project provides for the termination of all nonconforming oil uses over a 20-year amortization period, potentially resulting in the abandonment of existing wells. The cessation of oil extraction activities would not result in an adverse effect on a scenic vista as there would be no visible change at most sites as a result of the Project. In addition, abandonment activities will not result in significant physical changes to a scenic vista as

these activities do not include the construction of any new structures which could impede views or otherwise impact scenic vistas. Further, any abandonment activities would be temporarily occurring over the course of a few days or weeks (at most sites). As such, there would be no permanent change in any scenic vista. Further, the Oil Ordinance's prohibition on new oil and drilling¹ activities citywide will prevent the installation of additional facilities that could be visible from a scenic vista. As such, there will be no impacts.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state scenic highway?

No Impact.

Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) in Los Angeles County is the 2 Freeway near La Canada-Flintridge.

Within the City of Los Angeles, a six-mile portion of the Pasadena Freeway (also known as the Arroyo Seco Historic Parkway) from milepost 25.7 to 31.9 is designated as a Historic Parkway and other portions of freeways are considered eligible but not officially designated including 2.5 miles of Topanga Canyon State Scenic Highway (State Route 27).¹⁷ There are 14 wells within a half mile of radius of Scenic Highways in the City of Los Angeles. All 14 wells are inactive and plugged.¹⁸

Implementation of the Oil Ordinance will not result in any damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a state scenic highway as there would be no disturbance of previously undisturbed areas. As such, there would be no opportunity to damage scenic resources. Equipment in place at well sites would not be removed as a result of this Ordinance. The Ordinance prohibits the drilling of any new wells and the redrilling of existing wells which will prevent the installation of new facilities within these areas preventing the possibility of future impacts. Further, activities associated with well abandonment will be isolated to sites formerly used for oil and drilling activities and will not be located on land designated for state scenic highways. No impact would occur.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those

¹⁷ California Scenic Highway Mapping System, available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>

¹⁸ Caltrans, California Scenic Highway System Map, 2022, available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact.

For purposes of analysis, the entirety of the City is considered an urbanized area.¹⁹ Drill sites are located throughout the City, but many wells are also located in M3 zones, where only minimal standards relating to scenic quality exist, as shown in the project description. Some wells are located in residential zones where Community Plans are applicable containing scenic quality policies related to protecting single family and low-density neighborhoods from encroachment by higher density and other incompatible uses, protecting prominent vistas (such as hillsides), and protecting tree cover. The Ordinance would be consistent with these policies as it would, over the lifetime of the Ordinance, eliminate oil drilling in residential neighborhoods. Further, it would not conflict with any policies related to tree cover or protection of vistas as no new development would occur as a result of its implementation. As such, no impact would occur.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

No Impact.

Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

Implementation of the Ordinance will not result in substantial impacts related to light or glare, as none of the conditions described above would occur. No new development is authorized as part of the proposed Ordinance. Light sources associated with abandonment activities would be temporary in nature and would be required to adhere to all applicable regulations. Therefore, no impacts would occur.

¹⁹ According to *CEQA Guidelines* Section 15387 an “urbanized area” means a central city or a group of contiguous cities with a population of 50,000 or more, together with adjacent densely populated areas having a population density of at least 1,000 persons per square mile.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? ☐ ☐ ☐ ☒
- a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- d) Result in the loss of forest land or conversion of forest land to non-forest use?
- e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact.

Implementation of the Ordinance would not convert farmland to non-agricultural use, affect an agricultural preserve eligible for enrollment under a Williamson Act contract, or impact forest land or timberland. The Ordinance would not conflict with existing zoning for, or cause rezoning of, forest land or timberland. The Ordinance does not propose any changes to existing zoning or any new development that could reduce agricultural uses within the City. Therefore, the Ordinance would have no impact related to agricultural and forestry resources as there are no such resources that would be impacted by the Ordinance.

III. AIR QUALITY

The following is based on the Project's *Air Quality and GHG Technical Report* included as **Appendix A** to this Initial Study. The responses to the checklist questions below summarize the Project's potential air quality impacts found therein. For additional details related to air quality setting, regulatory framework, assumptions, methodology, and impact analyses, please refer to **Appendix A** to this Initial Study.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact.

As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The 2016 AQMP was drafted by the SCAQMD and was developed in effort with CARB, SCAG, and the EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieve California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS).²⁰ The plan's pollutant control strategies are

²⁰ South Coast Air Quality Management District. 2016. *Air Quality Management Plan*. Available online at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf>, accessed August 16, 2022.

based on SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). While SCAG adopted the updated 2020-2045 RTP/SCS in September 2020, it has not been incorporated into an applicable air quality plan.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following:

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the years of the project build-out phase.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under air quality checklist question (b) below, the Ordinance would not exceed the short-term standards or long-term standards and, thus, would not have the potential to violate any air quality standards. Thus, the Ordinance would be consistent with first criterion.

With respect to Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Ordinance would not result in any changes to housing or population forecasts for the City or the region as a whole. Therefore, the Ordinance would not exceed the assumptions utilized to develop the 2016 AQMP and the Ordinance would be consistent with the second criterion. As such, because the Ordinance would be consistent with the criteria for demonstrating consistency with the AQMP, the Ordinance would not have the potential to conflict with or obstruct implementation of any applicable air quality plan and this impact is less than significant.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment under an applicable federal or state ambient air quality standard?

Less than Significant Impact.

Short-Term and Temporary Air Quality Emissions

The abandonment of oil wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by

CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.²¹ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. See the **Project Description** section for the anticipated steps of well abandonment.

For purposes of estimating potential air quality associated with abandonment activities, it is assumed each well abandonment would last approximately two weeks (i.e., 10 work days), and on-site equipment would include one workover rig, one cement pump truck, one welder, and one tractor/loader/backhoe. On-road activity was estimated to include 10 worker trips per day (travel to and from the well locations) and 3 truck trips per day. This analysis conservatively assumes that all pieces of equipment would operate concurrently on a peak day, presenting a worst-case impact scenario.

Abandonment activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern include ozone-precursor pollutants (i.e., ROG and NO_x), PM₁₀, and PM_{2.5}. Abandonment-generated emissions are short term and of temporary duration, lasting only as long as activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance. Abandonment activities would be required to comply with all applicable SCAQMD Rules, which may include, but not be limited to: Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust – Trucks and Unpaved Roads), Rule 1186 (PM₁₀ Emissions from Paved and Unpaved Roads), Rule 1148 (Thermally Enhanced Oil Recovery Wells), Rule 1148.1 (Oil and Gas Extraction Wells), Rule 1148.2 (Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers), and Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). These Rules are discussed in greater detail in Section 2.4, Regulatory Framework, of the Project's *Air Quality and GHG Technical*

21 When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

Report (see **Appendix A** to this Initial Study). The estimated maximum daily abandonment related air quality emissions are summarized in **Table 6, Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day**.

Table 6
Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day

Source	ROG	NOx	CO	SO ₂	PM10	PM2.5
Off-Road Equipment	0.51	4.69	5.79	0.01	0.19	0.17
Worker Trips	0.09	0.10	1.51	0.00	0.02	0.00
Truck Trips	0.01	0.31	0.14	0.01	0.02	0.01
Total Emissions	0.61	5.10	7.44	0.02	0.23	0.18
Regional Threshold	75	100	550	150	150	55
<i>Exceed?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: Impact Sciences, September 2022. See **Appendix A** to this Initial Study.

As shown in **Table 6**, on a per-well basis, the peak daily emissions generated during abandonment would not exceed any of the regional emission thresholds recommended by the SCAQMD. As discussed previously, abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe. It would be speculative to assess how many wells would be abandoned during a given year, month, or peak day. Nevertheless, for illustrative purposes, based on the peak daily emissions identified in **Table 6** for a single well, it is possible for up to approximately 19 wells to be abandoned concurrently (i.e., overlapping on a peak day) without exceeding any of the regional emission thresholds recommended by the SCAQMD. Therefore, the Ordinance would not result in a cumulatively considerable net increase of any criteria air pollutant for which the region is in nonattainment and this impact is less than significant.

Long-Term Air Quality Emissions

Oil and gas operations throughout the City contribute to local and regional air quality conditions. Upon full implementation of the Ordinance, existing emission sources associated with oil and gas wells would no longer occur, and long-term air quality emissions would be decreased compared to existing emissions associated with oil and gas extraction throughout the City. The following discussion identifies the potential air quality emissions that may be avoided as a result of the Ordinance.

Long-term air quality emissions fall into two general categories: 1) worker commutes and 2) fugitive emissions. Typical emissions from worker commutes (i.e., motor vehicle trips) include ROG, NOx, CO, SOx, PM10 and PM2.5. Fugitive emissions include ROG (also

referred to as volatile organic compounds) which may include but not be limited to pentane, n-pentane, hexane, ethane, and other longer-chain hydrocarbons. In general, fugitive emissions from oil and gas activities may be attributed to the following primary types of sources: fugitive equipment leaks; process venting; evaporation losses; disposal of waste gas streams (e.g., by venting or flaring), and accidents and equipment failures. Fugitive leaks from piping and equipment are typically small yet detectable emissions from equipment where there are joints, flanges, and seals. Although joints and flanges are typically bolted, small amounts of hydrocarbons may be emitted through leaky joints.

It should be noted that fugitive emissions are difficult to quantify with a high degree of accuracy and there remains substantial uncertainty in the emission factors and calculation methodologies for oil and gas activities. This is due to the numerous types of sources and many variables to be considered. The key emission assessment issues are: (a) use of simple extraction based emission factors is susceptible to excessive errors; (b) use of rigorous bottom-up approaches requires expert knowledge to apply and relies on detailed data which may be difficult and costly to obtain; and (c) measurement programs are time consuming and very costly to perform.²² Nevertheless, **Table 7, Avoided Oil & Gas Air Quality Emissions – Pounds per Day**, has been included in an effort to illustrate the potential scope of air quality emissions that may be avoided as a result of the Ordinance.²³ Due to the programmatic nature of this analysis and the many variables at each oil and gas well throughout the City, the quantified estimates in **Table 7** are included as a good-faith effort for illustrative purposes. Furthermore, while it is clear the Ordinance would result in a net benefit to local and regional air quality conditions, the degree to which air quality emissions may be avoided under the Ordinance is not the basis for the impact determination. Because the Ordinance would reduce long-term air quality emissions compared to existing emissions associated with oil and gas extraction throughout the City, the Ordinance would not result in a cumulatively considerable net increase of any criteria air pollutant for which the region is in nonattainment and this impact is less than significant.

²² Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

²³ See **Appendix A** to this Initial Study for further information related to calculations and assumptions utilized to prepare these estimates.

Table 7
Avoided Oil & Gas Air Quality Emissions – Pounds per Day

Source	ROG	NOx	CO	SO ₂	PM10	PM2.5
Worker Emissions	1.12	1.11	16.60	0.06	2.71	0.50
Fugitive Emissions	807.66	--	--	--	--	--
Total Avoided Emissions	808.78	1.11	16.60	0.06	2.71	0.50

Source: Impact Sciences, September 2022. See **Appendix A** to this Initial Study.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact.

Localized Air Quality Emissions

The SCAQMD has developed localized significance thresholds (LST) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the applicable federal or State ambient air quality standard. LSTs are provided for each source receptor area (SRA) and various distances from the source of emissions. As the Ordinance is citywide, activities under the Ordinance could occur in parts of eight SRAs in the Coastal, Metropolitan, San Fernando Valley, and San Gabriel Valley areas.²⁴ The LSTs applicable to the Ordinance are presented in Table 7 of the Project's *Air Quality and GHG Technical Report* (see **Appendix A** to this Initial Study). The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. Abandonment activities would generate short-term localized emissions of criteria air pollutants. While abandonment-generated emissions are short term and of temporary duration, the emissions could be considered a significant air quality impact if the pollutants exceed the SCAQMD's LSTs.

As shown in **Table 8, Localized Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day**, the Ordinance would not exceed any of the identified localized thresholds of significance during abandonment. Therefore, the Ordinance would not

²⁴ The SRAs include: SRA 1, described as Central Los Angeles County; SRA 2, described as Northwest Los Angeles County Coastal; SRA 3, described as Southwest Los Angeles County Coastal; SRA 4, described as South Los Angeles County Coastal; SRA 6, described as West San Fernando Valley; SRA 7, described as East San Fernando Valley; SRA 8, described as West San Gabriel Valley; and SRA 12, described as South Central Los Angeles County.

expose sensitive receptors to substantial air pollutant concentrations and these impacts would be less than significant.

Table 8
Localized Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day

Activity	NOx	CO	PM10	PM2.5
Abandonment	4.69	5.79	0.19	0.17
SCAQMD Localized Thresholds	46.00	231.00	4.00	3.00
Exceed Thresholds?	No	No	No	No

Note: Based on the data in Table 7, the lowest (i.e., most restrictive) LST for each pollutant in any SRA citywide has been identified to present a conservative analysis.

Source: Impact Sciences, September 2022. See Appendix A to this Initial Study.

Diesel Particulate Matter

The use of diesel-powered equipment and trucks during abandonment would result in the generation of diesel particulate matter (diesel PM) emissions. The amount to which the sensitive receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment and trucks would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodologies for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). As discussed previously, typical abandonment activities are expected to last for approximately 10 work days. Therefore, short-term abandonment activities would not have the potential to generate a significant health risk. Furthermore, abandonment activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5-minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.²⁵ For these reasons, DPM emissions associated with abandonment would not expose sensitive receptors to substantial amounts of air toxics and this impact is less than significant.

²⁵ California Air Resources Board. 2015. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel-Fueled (Off-Road Regulation)*. Available online at: <https://ww3.arb.ca.gov/msprog/ordiesel/faq/idlepolicyfaq.pdf>, accessed August 16, 2022

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact.

The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.

Existing oil and gas operations throughout the City contribute to localized emissions that lead to odors. Several compounds associated with the oil and gas industry can produce nuisance odors. Sulfur compounds found in oil and gas have very low odor detection levels. Many volatile compounds found in oil and gas (e.g., pentane, n-pentane, hexane, ethane, and other longer-chain hydrocarbons) typically have a petroleum or gasoline-type odor. An odor “event” is generally considered a scenario where odors are released and negatively impact the surrounding community, measured as generating odor complaints to the SCAQMD and confirmed by the SCAQMD as attributable to a specific source.

During abandonment activities, the two primary sources of potential odors are fugitive well emissions and diesel exhaust from equipment and trucks. As abandonment activities are anticipated to last approximately 10 work days, these emission sources and associated odors would be temporary and intermittent, and affecting only those receptors located in proximity to the wells. In addition, abandonment activities would be subject to SCAQMD Rule 402 (Nuisance) and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. These regulations would serve to minimize temporary and intermittent odors. As oil and gas operations cease, existing oil and gas well emissions leading to odors would no longer occur, and long-term odors would be decreased compared to existing conditions. Therefore, the Ordinance would not create other emissions leading to odors adversely affecting a substantial number of people, and this impact is less than significant.

IV. BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				

Less than Significant Impact.

The Ordinance will prohibit new oil and gas extraction and require existing operations to cease within a 20-year amortization period. Twenty-five wells are located within Significant Ecological Areas (SEAs).²⁶ Six of these wells are active, while the remainder are inactive and plugged. Idle and abandoned wells are required to comply with LAFD regulations regarding brush clearance and other general maintenance that make these wells unlikely to provide biological resources in the form of habitat, species, or plant communities. Therefore, threatened, endangered, protected and sensitive species and habitats are not anticipated to be affected at these sites. Short-term abandonment activities that could occur at active and idle well sites will generally be limited to previously developed and disturbed areas and will not involve the removal of trees or vegetation that are habitat for candidate, sensitive, or special status species. In some cases, temporary accessways may be required to bring equipment to the well sites to complete the abandonment process. In these cases, the lead agency (i.e., the City) would require any necessary permits in accordance with applicable regulations and would ensure impacts to biological resources would not occur. Thus, impacts would be less than significant, and no mitigation is required.

- b) **Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less than Significant Impact.

²⁶ City of Los Angeles GeoHub, Significant Ecological Area (SEA), 2022.

Existing active and idle oil wells currently undergo either regular operations or site maintenance activities (such as brush clearance in accordance with LAFD requirements). As such, it is unlikely that these sites would provide riparian habitat or support sensitive natural communities. While six active wells are located in SEAs, the Ordinance would not require new activity at the wells beyond compliance with local and state requirements for abandonment. Such activities would be limited to accessing the wells to follow proper procedures and would not add any new permanent structures to the sites that could adversely affect sensitive natural communities. Due to the limited nature of activity at the well sites, and the fact that wells are currently not providing any valuable habitat, impacts would be less than significant, and no mitigation is required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Less than Significant Impact.

Short-term abandonment activities at existing well sites will be limited to previously developed and/or disturbed areas and, therefore, will not disturb any protected wetlands through direct removal, filling, hydrological interruption or other means. Therefore, impacts to wetlands would be less than significant and no mitigation is required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact.

As described in the preceding sections, well sites are not likely to offer any viable habitat. Further, the abandonment process generally requires limited disturbance to the surrounding area and would not interfere with any migratory species. Mature trees may be located near well sites. Although these trees are likely to be mainly ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. Activities that occur pursuant to the Ordinance would be limited to accessing and abandoning the wells themselves and would not interfere with any mature trees where nesting could occur. Thus, impacts would be less than significant, and no mitigation is required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact.

LAMC Sec. 46, the Tree Preservation Ordinance, (Ordinance No. 177,404) applies to protected trees (4 inches and greater in cumulative diameter at breast height) that are located on public and private properties. Protected tree removal requires a removal permit by the City of Los Angeles Department of Public Works (LADPW). Any act that may cause the failure or death of a protected tree requires inspection by the LADPW's Urban Forestry Division. The following tree species are protected: all native Oak tree species (*Quercus* spp, with the exception of scrub oak, *Quercus berberidifolia*), Western or California Sycamore (*Platanus racemosa*), California Bay (*Umbellularia californica*), Southern California Black Walnut (*Juglans californica*). In addition, on December 11, 2020, the City adopted Ordinance No. 186,873, extending protection status to include two native shrub species; Mexican elderberry (*Sambucus mexicana*) and toyon (*Heteromeles arbutifolia*). Activities associated with well operation cessation and subsequent abandonment would not involve the removal of trees or shrubs that would potentially conflict with the City's tree preservation policies and ordinance. Therefore, no impacts will occur.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact.

There are no Habitat Conservation Plans, or Natural Community Conservation Plans, or other approved habitat conservation plans that could be affected by the implementation of the Ordinance in the City of Los Angeles. As described above, the Ordinance does not have the possibility of impacting biological or sensitive resources that are protected within any existing plans. No impacts would occur, and no mitigation is required.

V. CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to <i>State CEQA Guidelines</i> §15064.5?				

Less than Significant Impact.

The Ordinance will prohibit new oil and gas extraction and require existing operations to cease within a 20-year amortization period. Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City. Therefore, the scope of this analysis is limited to the impacts of well cessation and abandonment. The anticipated abandonment activities are provided in the **Project Description**.

Section 15064.5(b) of the *CEQA Guidelines* states that a project would have a significant impact on historic resources if it would result in a substantial adverse change in the significance of a historic resource. Section 15064.5(a) of the *CEQA Guidelines* defines a historic resource as: 1) listed in, or determined to be eligible for listing, in the California Register of Historical Resources (CRHR); 2) included in a local register of historical resources; or 3) identified as significant in an historical resources survey. Any object, building, structure, site, area, place, record, or manuscript may be historically significant if the resource meets the criteria for listing on the CRHR.²⁷ The CRHR automatically includes all properties listed in or formally determined to be eligible for listing the National Register of Historic Places (NRHP).

To be eligible for listing in the NRHP, a property must be at least 50 years of age (unless it is of “exceptional importance”) and be significant in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

1. Associated with events that have made a significant contribution to American history;
2. Associated with the historically significant persons;

²⁷ *CEQA Guidelines* §15064.5(a)(3).

3. Embody distinctive characteristics of a type, period, or method of construction/work of a master; possess high artistic values; or represent a significant and distinguishable entity; or
4. Yield information important in prehistory or history.

To be eligible for listing in the CRHR, a property generally must be at least 50 years of age and be significant at the local, state, or national level under one or more of the following four criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history in California or the United States;
2. Associated with the lives of persons important to local, California, or national history;
3. Embody the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. Yielded information important in the prehistory or history of the local area, California, or the country.

The CRHR consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process.

According to HistoricPlacesLA, there is one oil well facility, the Cardiff Tower Oil Well Facility (also known as the West Pico Drill site), which appears eligible for National Register, State Register, and local listing or designation as a historic resource. Five facilities are identified as requiring additional research to determine their eligibility as a historic resource: the Hillcrest Country Club Oil Wells, the Rancho Park Golf Course Oil Wells, the Los Angeles Downtown Oil Wells, the 23rd Street - St. James Place Oil Wells (Allenco Drill Site), and the San Vicente Drill Site. These are sites where oil operations are either currently occurring or have occurred in the past that may have historical significance for the City. Following a review of the national, State and local registers for designated historic resources, it was determined that none of the oil facilities are officially designated historic resources.^{28,29,30} In addition, the Ordinance and any associated abandonment activities will not require demolition or substantial alterations of existing

²⁸ National Park Service. National Register of Historic Places. Available online at: <https://www.nps.gov/subjects/nationalregister/database-research.htm>, accessed September 1, 2022.

²⁹ California Office of Historic Preservation. California Historical Resources. Available online at: <https://ohp.parks.ca.gov/ListedResources/>, accessed September 1, 2022.

³⁰ City of Los Angeles. Los Angeles Historic Resources Inventory. Available online at: <http://historicplacesla.org/search>, accessed September 1, 2022.

structures on these sites. Typical well abandonment activities as described in the **Project Description** would not require the removal of structures or otherwise cause a change to a historical resource. While some activities would occur on the site during the abandonment process (i.e., construction equipment and/or trucks accessing the well site) such activities would not permanently change the area surrounding the well. The reasonably foreseeable result of this Ordinance is the abandonment of wells, but not the redevelopment of any well sites, and such analysis of future land uses would be speculative at this time. Further, any potential impacts to eligible resources associated with future potential site redevelopment, change to, or demolition of such resources would require case-by-case CEQA analysis and historical resource review by the Los Angeles City Planning's Office of Historic Resources (OHR) before a demolition or building permit can be pulled. Based on the above, it is speculative at this time to identify the loss of any particular resource and it is not foreseeable that an impact could occur to a significant historical resource pursuant to *State CEQA Guidelines* §15064.5. Therefore, impacts would be less than significant, and mitigation is not required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to *State CEQA Guidelines* §15064.5?

Less than Significant Impact.

California Public Resources Code Section 21083.2 provides guidelines for accidental discovery of archeological resources during ground disturbing activities. It is expected that most properties developed with wells have been previously disturbed to depths beyond where archeological resources would be found. Therefore, archaeological resources are unlikely to be uncovered when wells are abandoned. Although minor grading may occur during the abandonment process, such activities would be limited to previously disturbed areas where resources are unlikely to be located due to past disturbance. No excavation of previously undisturbed soils would occur as a result of the Ordinance that would have the potential to result in newly discovered resources. Therefore, impacts would be less than significant and no mitigation is required.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant Impact.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and *CEQA Guidelines* Section 15064.5(e). However, as described above, well sites have been previously excavated to depths beyond which it would be expected to find human remains. Although

minor grading may occur during the abandonment process, such activities would be limited to previously disturbed areas where resources are unlikely to be located due to past disturbance. Further, any temporary roadways necessary to access well sites or bring temporary equipment to the sites would be subject to review by the City through its permitting process. No excavation of previously undisturbed soils would occur as a result of the Ordinance that would have the potential to result in newly discovered resources. Therefore, impacts would be less than significant and no mitigation is required.

VI. ENERGY

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? | | | | |

Less than Significant Impact.

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated previously, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. As such, for purposes of this analysis, there are two distinct phases that would have the potential to change consumption of energy resources: 1) Short-term and temporary abandonment related activities, and 2) Long-term changes attributable to the cessation of oil and gas extraction and operations.

Activities associated with abandonment would require the use of energy associated with worker vehicle trips, truck trips, and use of equipment. However, the consumption of

energy associated with these activities would be short term and temporary and would occur in accordance with all applicable rules and regulations associated with the operation of motor vehicles, trucks and equipment. As such, the consumption of energy during abandonment would not be wasteful, inefficient, or unnecessary. With respect to long-term changes associated with the consumption of energy resources, the Ordinance is a reflection of State, regional, and local goals to move away from reliance on oil and gas energy sources. The State has enacted numerous legislative regulations to reduce dependence on fossil fuels and improve energy efficiency. California's Renewable Portfolio Standards established by Senate Bill 1078 requires that 60% of electricity generation be produced from clean renewable sources by 2030 and that the state become carbon-free by 2045. This has contributed to California's move away from electricity powered by coal and natural gas and a progressive increase in the use of solar and wind energy sources. This has occurred for both utility scale energy generation as well as for new single-family residential uses which are required to meet their electricity needs by installing solar panels under the State's Title 24 building standards. For passenger vehicles, Executive Order N-79-20 would ban the sales of new gasoline and diesel passenger vehicles while requiring that only new zero-emission vehicles be sold by 2035. This Executive Order is also consistent with CARB's regulations transitioning from diesel trucks and vans to zero emission trucks, and public bus fleets to be fully electric by 2040. See also **Table 4** and **Table 5** in the **Project Description** for a comprehensive list of state, regional, and City policies that support the Ordinance.

As such, the Ordinance would not result in the wasteful, inefficient, or unnecessary consumption of energy resources and this impact would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact.

As discussed above, the Ordinance is a reflection of state, regional, and local goals to move away from reliance on oil and gas energy sources. The State has enacted numerous legislative regulations to reduce our dependence on fossil fuels and improve energy efficiency. California's Renewable Portfolio Standards established by Senate Bill 1078 requires that 60% of electricity generation be produced from clean renewable sources by 2030 and that the state become carbon-free by 2045. This has contributed to California's move away from electricity powered by coal and natural gas and a progressive increase in the use of solar and wind energy sources. This has occurred for both utility scale energy generation as well as for new single-family residential uses which are required to meet their electricity needs by installing solar panels under the State's Title 24 building standards. For passenger vehicles, Executive Order N-79-20 would ban

the sales of new gasoline and diesel passenger vehicles while requiring that only new zero-emission vehicles be sold by 2035. This Executive Order is also consistent with CARB's regulations transitioning from diesel trucks and vans to zero emission trucks, and public bus fleets to be fully electric by 2040. See also Tables 4 and 5 in the **Project Description** for a comprehensive list of state, regional, and City policies that support the Ordinance. As such, the Ordinance is reflective of state and local plans for renewable energy and energy efficiency through the elimination of oil drilling in the City. No impact would occur.

VII. GEOLOGY AND SOILS

In 2015, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District (CBIA v. BAAQMD)*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. However, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project, as well as other impacted individuals.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ii. Strong seismic ground shaking? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| iii. Seismic-related ground failure, including liquefaction? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
ii) Strong seismic ground shaking?				
iii) Seismic-related ground failure, including liquefaction?				
iv) Landslides?				

No Impact.

Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults. These zones, which extend from 200 to 500 feet on each side of known active faults, identify areas where potential surface ruptures along active faults could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. There are several Alquist-Priolo Fault Zones located in the City.

The Ordinance does not include the construction of any new structures, such as housing or other uses that could potentially result in risk including loss, injury, or death. Any abandonment activities that would occur indirectly as a result of the ordinance would be conducted in accordance with CalGEM and LAFD requirement to ensure safety. The Ordinance is limited to the cessation of oil drilling in the City and would not directly or indirectly exacerbate geologic hazards related to rupture, ground shaking, liquefaction or landslides. No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?

No Impact.

Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the City include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used. Cessation of oil drilling at well sites would not result in any activities that could increase soil erosion. The abandonment process would be conducted in accordance with CalGEM and LAFD requirements and would not result in exposed topsoil or similar conditions where erosion could occur. No impacts would occur.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact.

Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. Subsidence is the sinking or gradual lowering of the earth's surface. Subsidence can result from either natural geologic and/or man-made causes and is found both on land and on the seafloor. Natural geologic causes are basin-downwarp, fault movement, sediment compaction, and relaxation of deep earth stresses. Man-made causes include groundwater pumping, mining, oil and gas production, river

channelization, and surface loading. A subsided area can vary in size from a few acres to thousands of square miles. Elevation losses can be from a fraction of an inch to tens of feet.

The Wilmington Oil Field underlies both the City of Los Angeles and the City of Long Beach. Oil or gas withdrawal subsidence has taken place extensively in the Long Beach Harbor area. At the center of the basin, subsidence amounted to as much as 30 feet at one time. To correct this problem, a full-scale water injection operation was initiated in 1958. Extensive repressurization of the reservoir through water injection has stabilized the area, which, along with substantial remedial land fill operations, has allowed continued use of port, petroleum production and commercial facilities.³¹ The Long Beach Oil and Gas Department monitors subsidence to ensure land remains stable during oil extraction.

The Ordinance will result in the cessation of oil and gas extraction in the City of Los Angeles. While the cessation and subsequent abandonment activities that could occur would not increase potential for subsidence as they would reduce the amount of oil extracted from City oil wells, the Ordinance recognizes subsidence as a health and safety concern and includes the provision for health and safety related activities on wells as determined necessary by the Zoning Administrator. Therefore, the Ordinance would not cause a geologic unit to become unstable and impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

No Impact.

The Project does not include the construction of any new structures that would have the potential to be located on expansive soil. Well abandonment activities would be required to comply with applicable CalGEM and LAFD requirements. As such, substantial direct or indirect risk to life or property would occur. No impact would occur.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact.

³¹ City of Long Beach General Plan Program, Public Safety Element, May 1975 (reprinted 2004).

The Project does not include the construction of any new structures that would require the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact.

Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations. As described under **Cultural Resources**, above, although minor grading may occur during the abandonment process, such activities would be limited to previously disturbed areas where resources are unlikely to be located due to past disturbance. No excavation or previously undisturbed soils would occur as a result of the Ordinance that would have the potential to result in newly discovered resources. Therefore, no impact would occur.

VIII. GREENHOUSE GAS EMISSIONS

The following is based on the Project's *Air Quality and GHG Technical Report* included as **Appendix A** to this Initial Study. The responses to the checklist questions below summarize the Project's potential GHG impacts found therein. For additional details related to GHG setting, regulatory framework, assumptions, methodology, and impact analyses, please refer to **Appendix A** to this Initial Study.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The City's methodology for assessing the significance of a project's GHG impacts generally includes 1) an evaluation of a project's potential to generate GHG emissions,

and 2) if a project does generate a net increase in GHG emissions, an evaluation if the project conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Thus, because many projects in the City generate a net increase in GHG emissions, both GHG checklist questions are typically evaluated together. However, as discussed below, because the Ordinance would not have the potential to generate an increase in long-term GHG emissions, each checklist question has been evaluated individually.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact.

Similar to the short-term and temporary air quality impact discussion provided previously (see **Air Quality** Section), activities associated with well abandonment also have the potential to generate short-term and temporary GHG emissions. Following the same assumptions utilized in the air quality impact discussion, the estimated abandonment related GHG emissions are summarized in **Table 9, Oil & Gas Well Abandonment GHG Emissions (Per Well)**. Because these emissions would be short-term and temporary, they are considered one-time GHG emission sources without the potential to increase long-term and recurring GHG emissions into the future. As discussed in further detail below, long-term and recurring GHG emissions would be decreased compared to existing GHG emissions associated with oil and gas operations throughout the City as oil and gas operations cease. Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City. As such, the one-time GHG emissions associated with abandonment are a necessary step in the process to achieve long-term and recurring GHG reductions from terminating oil and gas operations throughout the City.

**Table 9
Oil & Gas Well Abandonment GHG Emissions (Per Well)**

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)^a
Off-Road Equipment	3.88
Worker Trips	1.25
Truck Trips	1.05
Total GHG Emissions (Per Well)	6.18

^a While abandonment would likely occur over a short period (i.e., 10 work days), the estimate is presented in metric tons per year as this is the standard unit of measurement to describe GHG emissions.

Source: Impact Sciences, September 2022. See **Appendix A** to this Initial Study.

As oil and gas wells cease operation, existing GHG emission sources associated with oil and gas wells and long-term GHG emissions would be decreased compared to existing emissions associated with oil and gas wells throughout the City. The following discussion identifies the potential GHG emissions that may be avoided as a result of the Ordinance.

Long-term GHG emissions fall into two general categories: 1) worker commutes and 2) fugitive emissions. In general, fugitive emissions from oil and gas activities may be attributed to the following primary types of sources: fugitive equipment leaks; process venting; evaporation losses; disposal of waste gas streams (e.g., by venting or flaring), and accidents and equipment failures. Fugitive leaks from piping and equipment are typically small yet detectable emissions from equipment where there are joints, flanges, and seals. Although joints and flanges are typically bolted, small amounts of hydrocarbons may be emitted through leaky joints.

It should be noted that fugitive emissions are difficult to quantify with a high degree of accuracy and there remains substantial uncertainty in the emission factors and calculation methodologies for oil and gas activities. This is due to the numerous types of sources and many variables to be considered. The key emission assessment issues are: (a) use of simple production-based emission factors is susceptible to excessive errors; (b) use of rigorous bottom-up approaches requires expert knowledge to apply and relies on detailed data which may be difficult and costly to obtain; and (c) measurement programs are time consuming and very costly to perform.³² Nevertheless, **Table 10, Avoided Oil & Gas GHG Emissions**, has been included as a good-faith effort to illustrate the potential scope of GHG emissions that may be avoided as a result of the Ordinance.³³ Due to the programmatic nature of this analysis and the many variables at each oil and gas well throughout the City, the quantified estimates in **Table 10** are included for illustrative purposes. Furthermore, while it is clear the Ordinance would result in a net benefit to local and regional GHG emissions, the degree to which GHG emissions may be avoided under the Ordinance is not the basis for the impact determination. Because the Ordinance would reduce long-term GHG emissions compared to existing emissions associated with oil and gas wells throughout the City, the Ordinance would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Furthermore, as discussed in GHG checklist question (b) below, the Ordinance would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Therefore, this impact is less than significant.

³² Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

³³ See **Appendix A** to this Initial Study for further information related to calculations and assumptions utilized to prepare these estimates.

Table 10
Avoided Oil & Gas GHG Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)^a
Worker Emissions	142
Fugitive Emissions	9,827
Total Avoided GHG Emissions	9,969

^a As described previously herein, abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe. It would be speculative to assess how many wells would be abandoned during a given year, month, or peak day. Thus, the total avoided GHG emissions estimated here represents the annual metric tons per year upon abandonment of all wells. Source: Impact Sciences, September 2022. See **Appendix B** to this report.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact.

As discussed in detail in the Project's *Air Quality and GHG Technical Report* (see **Appendix A** to this Initial Study), AB 32 required CARB to adopt a scoping plan indicating how reductions in significant GHG sources will be achieved through regulations, market mechanisms, and other actions. In 2008, CARB released the Climate Change Proposed Scoping Plan in October 2008 that contained an outline of the proposed state strategies to achieve the 2020 greenhouse gas emission limits as outlined in AB 32. In response to SB 32, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Update), which outlines the proposed framework of action for achieving California's SB 32 2030 GHG target: a 40 percent reduction in GHG emissions by 2030 relative to 1990 levels.³⁴ The 2030 target is intended to ensure that California remains on track to achieve the goal set forth by E.O. B-30-15 to reduce statewide GHG emissions by 2050 to 80 percent below 1990 levels.

The Ordinance would be consistent with the objectives of CARB's Scoping Plan, which is intended to reduce GHG emissions in accordance with AB 32 and SB 32. The Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other strategies to reduce GHGs. Most of these measures focus on area source emissions (e.g., energy production, distribution and usage, and high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels

³⁴ CARB, *California's 2017 Climate Change Scoping Plan*, November 2017.

(e.g., Low Carbon Fuel Standard), among others. The Ordinance would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the Ordinance. For example, abandonment activities will utilize equipment in compliance with regulations set forth by CARB. Mobile sources during abandonment would be subject to the requirements of California Assembly Bill 1493 (Pavley Standards), the Advanced Clean Cars Program, and the Low Carbon Fuel Standard Regulation. Additionally, while the Ordinance is not a GHG reduction plan, the Ordinance is a reflection of state, regional, and local goals to move away from reliance on oil and gas energy sources which will serve to reduce long-term GHG emissions and help the State achieve the GHG reductions mandated in AB 32 and SB 32. The State has enacted numerous legislative regulations to address climate change by reducing our dependence on fossil fuels to reduce GHG emissions. California's Renewable Portfolio Standards established by Senate Bill 1078 requires that 60% of our electricity generation be produced from clean renewable sources by 2030 and become carbon-free by 2045. This has contributed to California's move away from electricity powered by coal and natural gas and a progressive increase in the use of solar and wind energy sources. This has occurred for both utility scale energy generation as well as for new single-family residential uses which are required to meet their electricity needs by installing solar panels under the State's Title 24 building standards. For passenger vehicles, Executive Order N-79-20 would ban the sales of new gasoline and diesel passenger vehicles while requiring that only new zero-emission vehicles be sold by 2035. This Executive Order is also consistent with CARB's regulations transitioning from diesel trucks and vans to zero emission trucks, and public bus fleets to be fully electric by 2040. See also Tables 4 and 5 in the Project Description for a comprehensive list of state, regional, and City policies that support the Ordinance. Thus, because the Ordinance is consistent with state, regional, and local goals to move away from reliance on oil and gas energy sources, the Ordinance would not have the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and this impact is less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				

Less than Significant Impact.

As defined by State law in California Code of Regulations and LAFD CUPA, hazardous wastes are any chemical wastes that are ignitable, toxic, reactive, corrosive, or carcinogen. These wastes may include waste oil, waste coolant, waste parts cleaner, used oil filters and fuel filters, dry cleaning solvents and paints. A waste or combination of wastes, which because of its quantity, concentration, or physical or chemical characteristics may either: 1) cause or significantly contribute to an increase in mortality or an increase in serious irreversible illness; or 2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of, or otherwise managed. Existing city, county, and state regulations for oil drill sites mitigate or minimize the risk that operation of these well pose in high-risk areas. For example, the LAFD requires that all crude oil facilities submit Hazardous Material Business Plans to identify the extent of the hazardous materials and functions operated on-site. In addition, LAFD also requires a Spill Containment and Control Plan that mitigates spills both on-site and in the adjacent areas around the oil extraction site. CalGEM also conducts regular inspections of the facility to review equipment safety functions and ensure that pipelines are safely maintained. South Coast AQMD also responds to air pollution complaints and has safety standards for specific pieces of equipment that carry the risk of emitting specific odors and that may pose hazards to the workers and local vicinity.

The termination of oil extraction activities would reduce the potential for risk to the public through routine transport, use or disposal of hazardous materials such as petroleum, as extraction would no longer occur citywide. Well abandonment uses materials such as, but

not limited to, cement, bentonite, and various drilling fluids reviewed by the California Department of Conservation's CalGEM division. Therefore, the processing and handling of these materials would be conducted in accordance with the regulatory compliance measures that exist under the jurisdictions of the California Code of Regulations, LAFD CUPA, and CalGEM. Impacts would be less than significant; no mitigation is required.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact.

Methane

Methane (CH₄) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by reducing the relative concentration of oxygen in the air that is inhaled (similar to carbon monoxide). The primary danger posed by methane build-up (specifically when within confined spaces) is the risk of fire or explosion.

Methane levels in the local atmosphere are monitored by the CARB and SCAQMD, and are measured in parts per million, or ppm. Normal background is approximately 2 ppm. Results greater than 3 ppm suggest some additional sources of methane, and results greater than 10 ppm suggest a considerable additional amount of methane is present.³⁵

The termination of oil extraction activities would reduce the potential for upset and accident conditions associated with oil extraction citywide. Once a well is undergoing abandonment operations, CalGEM would monitor and enforce required methane safety protocols, and CARB and the SCAQMD would measure methane concentrations at the surface around the well. In addition, air measurements would be taken using downwind airplane flights shortly after the well is controlled in order to estimate the leak rate. All of these measurements will indicate whether methane and associated compounds currently are abating due to a successful seal of the well. Some amount of residual methane is expected to seep out of the ground around the leaking well after the well is successfully sealed. In keeping with current policy, the area would continue to be monitored by CARB

³⁵ Air Quality Management District, Continuous Methane Monitoring, website: <https://www.aqmd.gov/home/news-events/community-investigations/aliso-canyon-update/air-sampling/air-monitoring-activities/continuous-methane-monitoring-data>, accessed September 2, 2022.

and SCAQMD to ensure that methane levels remain below the 3 ppm threshold.³⁶ In the event that methane levels above the acceptable threshold are identified, both CARB and SCAQMD have the jurisdiction to enforce air pollution regulations related to oil drilling and production and methane emissions. Both agencies have the right to conduct inspections of air pollution sources, and the right to issue a Notice to Comply (NC), requiring a facility to quickly correct a minor violation or to provide specified records, or a Notice of Violation (NOV), formally identifying a violation of particular rules or regulations, which may result in civil penalties or, in some cases, referral for criminal prosecution.³⁷

Worker exposure to methane is regulated by the OSHA under CFR section 1910.146. This section regulates worker exposure to a ‘hazardous atmosphere’ within a confined space where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit.

Chapter IX, Article 1, Division 71, Section 91.7103 of the LAMC, also known as the Los Angeles Methane Seepage Regulations, identifies Methane Hazard Zones and Methane Buffer Zones. Oil and gas wells may be located within a Methane Hazard Zone, as designated by LADBS. Due to the potential environmental risk associated with Methane Hazard Zones, properties within a Methane Hazard Zone require methane testing and mitigation upon redevelopment. As implementation of the Oil Ordinance would not involve the redevelopment of any of the oil well sites, no action related to methane zones would be necessary.

Future well abandonments that may occur as a result of the Ordinance would be subject to the regulations and standards established by local and state agencies such as CalGEM’s statutory oil well abandonment requirements. Compliance with these requirements will ensure risk due to upset or accident conditions involving the release of hazardous materials would be minimized. Additionally, the proposed Ordinance would not allow new development or expansion of oil operations that would otherwise have a potential to create impacts and would reduce the number of operating wells, thereby reducing the potential for future accidents. Therefore, impacts to releasing hazardous materials into the environment would be less than significant, no mitigation is required.

³⁶ California Geologic Energy Management Division, Process to Confirm that the Leaking Well is Sealed California Department of Conservation, Division of Oil, Gas and Geothermal Resources, <https://www.conservation.ca.gov/index/Documents/DOGGR%20process%20for%20determining%20well%20sealed%20draftl.pdf>, accessed September 2, 2022.

³⁷ Air Quality Management District Community Emissions Reduction Plan for Wilmington, Carson, West Long Beach, September 2019, website: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf>, accessed September 2, 2022.

- c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Less than Significant Impact.

Due to the pervasive nature of oil wells in the City, wells are known to operate within ¼-mile of existing schools. The Ordinance provides for the termination of all nonconforming oil uses over a 20-year amortization period. The cessation of oil extraction would result in a decrease in the number of wells operating near school sites, thereby reducing potential risk. Future well abandonments would be subject to the regulations and standards established by local and state agencies such as CalGEM's statutory oil well abandonment requirements. Additionally, the proposed Ordinance would not allow new development or expansion of oil operations that would otherwise have a potential to create impacts.

All potentially hazardous materials transported, stored, or used on individual well sites for abandonment activities would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. All abandonment activities would be required to comply with all federal, state and local standards and regulations. Therefore, the abandonment activities that occur as a result of the Ordinance are not expected to adversely affect existing schools in and around the abandonment sites. Impacts would be less than significant, and no mitigation is required.

- d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

Less than Significant with Mitigation Incorporated.

California Government Code Section 65962.5, commonly referred to as the "Cortese List," requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis.

These lists include, but are not limited to, the 'EnviroStor' (<http://www.envirostor.dtsc.ca.gov/public/>) and 'GeoTracker' (<http://geotracker.waterboards.ca.gov/>) lists maintained by the DTSC and the SWRCB, respectively.

As described in the **Project Description**, many of the oil drilling sites are within M3 zones. M3 zones are heavy industrial zones that allow for uses such as cargo container storage, junk yards and scrap metal processing. These uses are commonly contained on the Cortese List. Due to the limited data available regarding the exact location of oil and gas wells within M3 zones, there is overlap between the wells and other properties on the Cortese List. Nonetheless, it is reasonable to assume many of the wells in M3 zones are also on the Cortese List. In addition to wells in the M3 zone, other wells are also believed to be located on the Cortese List.

The Ordinance would require the cessation of oil and gas extraction Citywide, including on any sites that are known to be on the Cortese List. The cessation of oil and gas extraction would not create a significant hazard to the public or the environment and instead would have a beneficial effect of reducing air quality and GHG emissions (See Air Quality, GHG). As described in a) through c) above, all abandonment activities would be completed in accordance with CalGEM and LAFD requirements thereby ensuring no risk to the public would occur. However, due to the high likelihood that soil contamination exists at many of the well sites as a result of their location on the Cortese List, additional mitigation is required. Mitigation Measure HAZ-1 would require prior to abandonment, the well owner to review the Cortese List to determine if the subject well is on the list. If it is found that the subject well (or grouping of wells) is on the list, a Phase I Environmental Site Assessment (ESA) should be conducted to determine the level of contamination. Compliance with recommendations in the Phase I ESA would reduce potential impacts to below a level of significance.

Lastly, it would be speculative to determine any future use that might occur on these sites. At the time when any well sites are considered for redevelopment, including well sites in M3 zones or located on Cortese List, those actions would undergo additional environmental review in accordance with CEQA. With implementation of HAZ-1, impacts are considered less than significant.

MM HAZ-1 For well sites in which the abandonment process requires grading and are:

- Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases:
 - State Water Resources Control Board GeoTracker (refer to <https://geotracker.waterboards.ca.gov>);
 - DTSC EnviroStor (refer to <https://www.envirostor.dtsc.ca.gov/public>);
 - DTSC Hazardous Waste Tracking System (refer to <https://hwts.dtsc.ca.gov>);

- LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at <https://www.lafd.org/fire-prevention/cupa/public-records>);
- Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at <https://fire.lacounty.gov/public-records-requests>);
- SCAQMD Facility Information Detail (refer to <https://xappprod.aqmd.gov/find>); or
- Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the U.S. EPA Envirofacts database at <https://enviro.epa.gov/index.html>);

And:

- The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions.

Then a Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.

If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to appropriate proof of compliance and made available for review and inclusion in the administrative record by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency to ensure the abandonment process does not exacerbate existing identified hazardous conditions shall be implemented and, if required, a No Further Action letter, or equivalent, shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance

with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be maintained pursuant to appropriate proof of compliance requirements.

- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?**

Less than Significant Impact.

Three airports are located within the City of Los Angeles: two public and one general aviation, respectively they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. There are three inactive plugged wells located within one mile of LAX. However, the Project does not include the construction of any new structures that could interfere with existing flight paths. The Ordinance will not result in a safety hazard for any people residing or working in a project area located within an airport land use plan, within two miles of an airport or in the vicinity of a private airstrip. Noise impacts from abandonment operations would also be less than significant, no mitigation is required – refer to the analysis in Section XIII. NOISE, below.

- f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Less than Significant Impact.

Emergency services in the City are provided by the LAFD and the City of Los Angeles Police Department (LAPD). Emergency incidents of a larger natural or manmade disaster require coordinated efforts between the LAFD, LAPD and the City's Emergency Operation Center (EOC). The EOC is the focal point for coordination of the City's emergency planning, training, response and recovery efforts. EOC processes follow the National All-Hazards approach to major disasters such as fires, floods, earthquakes, acts of terrorism and large-scale events in the City that require involvement by multiple City departments.

Implementation of the Ordinance would not require or result in permanent modifications to roadways that would impact emergency access. The Ordinance would not result in changes to existing policies, programs, or regulations that address emergency response. Abandonment of oil wells that occurs after cessation of well operation would be reviewed by the LAFD and LAPD to ensure that abandonment operations conform to all applicable regulations (including those applicable to construction related traffic) that address emergency response and access, including the LAFD Fire Code requirements.

While intermittent road closures could occur as a result of abandonment operations, it is not anticipated that such closures would result in substantial delays to service providers. Any lane closures must be approved by LADOT and they would not be approved if substantial delays could result. Typically, LADOT will require a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Therefore, impacts related to emergency response and access as a result of the Ordinance would be less than significant, no mitigation is required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact.

There are currently 21 active wells and 2 idle wells located in the City's designated Very High Fire Hazard Severity Zone. The Ordinance would not result in any new permanent and/or habitable structures in these zones that could exacerbate fire risk. Maintained brush clearance and defensible space requirements are and will continue to be required in accordance with LAFD protocols. Therefore, activities associated with termination and future abandonment would not impact state responsibility areas or lands classified as very high fire hazard severity zones. No impacts regarding wildfire risks or related post-fire conditions would occur.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i. Result in substantial erosion or siltation on- or off-site;				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;				
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
iv. Impede or redirect flood flows?				
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				

No Impact.

The purpose of the Ordinance is to terminate existing oil extraction in the City. The termination of extraction activities would have no impact on water or groundwater. Future well abandonment that subsequently may occur would not involve demolition of existing structures, which may instead take place as part of any remediation, which is outside the

scope of this analysis. Internal roads, access ways and storm water retention and other drainage features and facilities shall remain in place. Because no changes would occur regarding water quality standards, waste discharge requirements or otherwise impact surface or ground water quality, implementation of the Ordinance would not have any impacts related to water quality standards, waste discharge requirements or surface or ground water quality. No impact would occur.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact.

Cessation of well operations would not require the use of groundwater, nor would any change in impervious surface occur that could result in interference with groundwater recharge. Well abandonment activities may require water to plug the wells, however, such water usage would be a one-time use and would not be substantial such that it would interfere with groundwater management. As such, these activities would not result in a decrease in groundwater supplies and would not interfere with groundwater recharge. No impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site;**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
- iv. Impede or redirect flood flows?**

No Impact.

Cessation of well operations would not alter drainage patterns. Future well abandonment that may occur subsequent to the Ordinance would not involve any changes to, or demolition of existing drainage infrastructure. Internal roads, access ways and storm water retention and other drainage features and facilities shall remain in place. No changes would occur to the course of any existing stream or river, and as previously

discussed, there would be no addition to impervious surfaces. Abandonment operations would not result in the substantial alteration of drainage patterns resulting in erosion or siltation on- or off-site, increase the rate of surface water runoff exceeding the capacity of stormwater and flood management resources or substantial polluted runoff, or impede or redirect flood flows. All existing stormwater retention facilities and other storm water retention and drainage features and facilities will remain in place. No impact would occur.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact.

Cessation of well operations and potential future abandonment of wells would not involve any changes to, or demolition of existing drainage infrastructure. Internal roads, access ways and storm water retention and other drainage features and facilities shall remain in place. While some of the existing wells may be located within in flood hazard, tsunami, or seiche zones, activities related to abandonment would not increase the risk of release of pollutants involving flooding or inundation as all wells would be required to be properly abandoned in accordance with CalGEM requirements. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

No Impact.

As described in X (a) through (d) well cessation that would occur as a result of the Ordinance, and subsequent abandonment of wells would not have an adverse impact on water quality or groundwater. Subsurface activities would involve the plugging of existing and excavated well boreholes with cement, mud and soil. Previously disturbed areas will not involve new excavations or deepening of existing excavations and will not involve the handling or release of hazardous materials. Well plugging under the supervision of CalGEM is designed to protect aquifer zones. All materials removed from the oil well abandonment and abandonment operations area will be disposed of in compliance with all applicable laws and regulatory requirements. No impact would occur.

XI. LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Physically divide an established community?

No Impact.

The purpose of the Ordinance is to terminate oil extraction in the City. No new permanent structures would be constructed as part of the Project. As such, the Ordinance would not result in the physical division of an established community.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact.

The L.A. CEQA Thresholds Guide 2006³⁸ addresses consistency with plans:

For conflicts with environmental goals and policies, consider whether the project would interfere with the City's efforts to meet such goals, or be inconsistent with adopted policies.

To determine the Project's potential to conflict with adopted policies, the following City plans were reviewed: Conservation Element of the General Plan, West Adams-Baldwin Hills-Leimert Community Plan, Harbor Gateway Community Plan (2022 Draft), Air Quality Element, A Healthy Plan for Los Angeles, Safety Element, L.A.'s Green New Deal,

³⁸ City of Los Angeles, L.A. CEQA Thresholds Guide 2006. Available at: <https://planning.lacity.org/eir/CrossroadsHwd/deir/files/references/A07.pdf>

Wilmington Harbor City Community Plan (2022 Draft). Table 4 in the Project Description provides the relevant policies for each of the plans.

As is shown in the Table, the vast number of these policies recognize the negative health and safety implications of locating oil wells in proximity to residential uses. Further, as can be seen in the table, the City has adopted numerous policies over the last 20 years that encourage either increased management of or termination of oil drilling, including:

- Policy LU75-1 Discretionary Review. Seek a high level of discretionary review for any changes to, or expansion of, existing oil extraction sites and activities so that the public may remain informed and involved, and so that appropriate environmental review may take place pursuant to the California Environmental Quality Act. (West Adams-Baldwin Hills-Leimert Community Plan)
- Policy 2: continue to support state and federal bans on drilling in the Santa Monica Bay and on new drilling along the California coast in order to protect the San Pedro and Santa Monica bays from potential spills associated with drilling, extraction and transport operations. (Conservation Element)
- Coordinate with L.A. County to develop a sunset strategy for oil and gas production operations (L.A. Green New Deal)
- Reduce oil production by 40% below 2013 levels
- 1.2.1 Environmental Justice. In keeping with the Plan for a Healthy LA, build a fair, just and prosperous city where everyone experiences the benefits of a sustainable future by correcting the long running disproportionate impact of environmental burdens faced by low-income families and communities of color. (Safety Element)
- 5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others. (A Plan for a Healthy Los Angeles)

The Ordinance is consistent and does not conflict with the policies identified in **Table 4**, including the policies set forth above, as it would require the termination of oil and gas extraction in the City. The Ordinance is consistent with current City goals and policies, shown above, that encourage buffers from active wells and call for a transition toward green energy sources such as renewable solar. The Ordinance will help further the goals of the General Plan Health, Wellness and Equity Element, as it seeks to protect community health and wellbeing from exposure to noxious activities, specifically oil and

gas extraction, that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapor and others.³⁹

Cessation of oil and gas extraction activities is consistent with the above policies as it would not interfere with the City's effort to meet such goals and policies and would instead help to further the stated goals and policies. Therefore, the Ordinance does not have the potential to result in any significant impacts due to conflict with existing plans and policies, as no conflict would occur. Impacts would be less than significant, and no mitigation is required.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				

Less than Significant Impact.

The City of Los Angeles General Plan provides growth and development policies by providing a comprehensive long-range view of the City as a whole. The Conservation Element of the General Plan consists of an identification and analysis of the existing natural resources in the City of Los Angeles.

³⁹ Health, Wellness and Equity Element "Plan for a Healthy Los Angeles", page 95 Section 5.4 Noxious activities, available on the City's website at: https://planning.lacity.org/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf

Policies of the Safety and Conservation Element include the preservation of mineral resources and of the access to these resources:

- Policy 1: Continue to encourage energy conservation and petroleum product reuse
- Policy 3: Continue to protect neighborhoods from potential accidents and subsidence associated with drilling, extraction, and transport operations, consistent with California Department of Conservation, Division of Oil and Gas requirements

The Health Element includes the following policy related to oil extraction:

- 5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others. (A Plan for a Healthy Los Angeles)

The Safety Element includes the following policies regarding energy usage:

- 1.2.2 Renewable Energy. Aggressively pursue renewable energy sources, transitioning away from fossil based sources of energy and toward 100% renewable energy sources.
- 1.2.7 Zero Emissions Vehicles. In keeping with the Mobility Plan, work toward zero emissions transportation and goods movement and increase zero emissions infrastructure including charging.

As stated in XI Land Use, numerous other policies have been adopted by the City over the last several years that support limitations such as setbacks on oil wells and encourage a move away from petroleum at the City level. Each of these policies signal a long-term shift away from petroleum to renewables and electricity. As such, while the 2001 Conversation Element provides a map of the various oil fields in the City and discusses petroleum as a resource, the City does not consider petroleum to be a mineral resource of local importance and considers the activities associated with its extraction to be detrimental to public health, safety, and the environment. This is reflected in recent City initiatives and ordinances such as the Green New Deal, Clean Up Green Up (LAMC 13.18 eff. June 2016) and in policies included in the updates to the Health and Safety elements of the City's General Plan adopted on November 24, 2021, including Health Element policy 5.4 and Safety Element policies 1.2.2 and 1.2.7. Furthermore, this Ordinance is consistent with Conservation Element, Section 19 policies 1 and 3 to “encourage conservation of petroleum,” and to “protect neighborhoods from potential accidents and subsidence associated with [petroleum] drilling, extraction and transport operations...”

As previously stated, the annual cumulative oil production in 2017 in the City was two percent of the state's total production. This represents a small amount of the available Statewide resource. As State and national policies also shift away from petroleum the value of the resource continues to diminish. Therefore, termination of oil and gas extraction would not represent the loss of a mineral resource that would be of value to the region and the residents of the state. Impacts would be less than significant and no mitigation is required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Less than Significant Impact.

As described under XII(a) above, petroleum is no longer considered an important mineral resource at the local level. This shift is evidenced in the numerous goals and policies adopted by the City over the last 20 years that support a move away from petroleum in favor of renewable energy and electricity (See Tables 4 and 5 in the Project Description). Further, as the health impacts associated with oil and gas extraction have been made clear, the City has moved toward prioritizing the health and safety of residents over oil and gas extraction. In particular, the Ordinance will help further the goals of the General Plan Health, Wellness and Equity Element “Plan for a Healthy Los Angeles” adopted in November 2021 (Health Element), as it seeks to “protect communities” health and wellbeing from exposure to noxious activities (for example oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapor and others.”⁴⁰ The Ordinance represents another example of the City implementing its more current goals and policies that call for a transition away from oil and gas uses. For the reasons stated above, these mineral resources are no longer considered locally important, therefore, impacts would be less than significant and no mitigation is required.

XIII. NOISE

The following is based on the Project’s *Noise and Vibration Technical Report* included as **Appendix B** to this Initial Study. The responses to the checklist questions below summarize the Project’s potential impacts found therein. For additional details related to noise and vibration setting, regulatory framework, assumptions, methodology, and impact analyses, please refer to **Appendix B** to this Initial Study.

⁴⁰ Health, Wellness and Equity Element “Plan for a Healthy Los Angeles”, page 95 Section 5.4 Noxious activities, available on the City’s website at: https://planning.lacity.org/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf

<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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Would the project result in:

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
- a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

Less than Significant with Mitigation Incorporated.

Short-Term and Temporary Noise

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig

will be used to abandon the well and remove equipment from the well.⁴¹ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. See the **Project Description** for the anticipated steps of well abandonment.

For purposes of estimating potential noise and vibration levels associated with abandonment activities, it is assumed each well abandonment would last approximately two weeks (i.e., 10 work days), and on-site equipment would include one workover rig, one cement pump truck, one welder, and one tractor/loader/backhoe. This analysis conservatively assumes that all pieces of equipment would operate concurrently, presenting a worst-case impact scenario.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities. With the use of the RCNM, as detailed in **Appendix B** to this Initial Study, the short-term and temporary noise levels associated with abandonment activities are presented in **Table 11, Temporary Noise Levels During Well Abandonment - Unmitigated**. As shown in **Table 11**, noise levels were estimated at distances of up to 50 feet, 75 feet and 100 feet to characterize potential noise levels that may be experienced at sensitive receptors located in proximity to oil and gas wells throughout the City. Noise levels would diminish notably with distance from the site at a rate of 6 dB(A) per doubling of distance (noise from stationary or point sources is reduced by about 6 dB(A) for every doubling of distance at acoustically hard locations). For example, a noise level of 86 dB(A) Leq measured at 50 feet from the noise source to the receptor would decline to 80 dB(A) Leq at 100 feet from the source to the receptor and fall by another 6 dB(A) Leq to 74 dB(A) Leq at 200 feet from the source to the receptor. These noise attenuation rates assume a flat and unobstructed distance between the noise generator and the receptor. Intervening structures and vegetation would further attenuate (reduce) the noise. Furthermore, it should be noted that increases in noise levels at sensitive receptors during abandonment would be intermittent and temporary and would not generate continuously high noise levels.

41 When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

Table 11
Temporary Noise Levels During Well Abandonment - Unmitigated

Sensitive Receptor Location	Distance to Well (feet)	Estimated Temporary Noise Levels [dB(A)]	Exceed LAMC Standards?
1. Sensitive Receptors at 50 Feet	50	79	Yes
2. Sensitive Receptors at 75 Feet	75	75	No
3. Sensitive Receptors at 100 Feet	100	73	No

*Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this Initial Study.*

Short-term and temporary impacts would be potentially significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dBA) at a distance of 50 feet from the noise source. Although not required in the LAMC, this analysis also applies this LAMC standard for non-residentially zoned sensitive receptors located in proximity to oil and gas wells throughout the City. It should also be noted that the LAMC noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. As shown in **Table 11**, the estimated unmitigated temporary noise levels could exceed the 75 dBA noise standard at distances of up to 50 feet from the source, and unmitigated noise levels would not exceed the 75 dBA noise standard at distances of up to 75 feet and 100 feet from the source. As noise levels would diminish with distance from the source, unmitigated noise levels at distances beyond 100 feet from the source would not have the potential to exceed the noise standard. Nevertheless, as the estimated unmitigated temporary noise levels could exceed the 75 dBA noise standard at distances of up to 50 feet from the source, this impact is considered potentially significant.

Mitigation Measures

MM NOI-1: Where well abandonment activities occur within 50 feet of the following sensitive receptors: schools, day cares, elder care facilities, adult residential facilities, parks, hospitals, or residences, flexible sound control curtains shall be erected between the noise-producing equipment and the sensitive receptors, blocking the line-of-sight between the sources and receptors. The sound control curtain materials shall meet a minimum Sound Transmission Class (STC) 20 rating, capable of reducing equipment noise by at least 5 dBA.

Level of Significance after Mitigation

The use of flexible sound control curtains, as required in **Mitigation Measure NOI-1**, would be feasible and effective at reducing short-term and temporary noise levels at sensitive receptors located within 50 feet of well abandonment activities. The STC-20 rating identified in **Mitigation Measure NOI-1** requires the sound control curtain material to have a transmission loss (TL) value of 20 dB. TL is defined as the loss in sound energy, expressed in decibels, as sound passes through a barrier or a wall.⁴² According to FHWA Noise Barrier Design Handbook, the design feasibility of a sound barrier that reduces noise by 5 dBA is considered “simple” and a reduction of up to 10 dBA as “attainable.”⁴³ Thus, the data suggests that **Mitigation Measure NOI-1** could reduce noise levels by up to 10 to 20 dBA. However, this analysis conservatively assumes that a 5 dBA reduction would be achieved with the implementation of **Mitigation Measure NOI-1**. As shown in **Table 12, Temporary Noise Levels During Well Abandonment - Mitigated, Mitigation Measure NOI-1**, would ensure temporary noise levels would not exceed the LAMC standard of 75 dBA at 50 feet from the source.

Table 12
Temporary Noise Levels During Well Abandonment - Mitigated

Sensitive Receptor Location	Distance to Well (feet)	Estimated Temporary Noise Levels [dB(A)]	Exceed LAMC Standards?
1. Sensitive Receptors at 50 Feet	50	74	No
2. Sensitive Receptors at 75 Feet	75	70	No
3. Sensitive Receptors at 100 Feet	100	68	No

*Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this Initial Study.*

Other noise best practices would be implemented during the abandonment process. These best practices would also help to reduce temporary noise levels in accordance with LAMC Section 112.05. For example, abandonment activities would be scheduled so as to avoid operating several pieces of equipment simultaneously (as feasible), which causes high noise levels. Further, noise and groundborne vibration activities whose specific location on or near the site are flexible (e.g., stationary equipment and truck idling) will be conducted as far as possible from the nearest noise- and vibration-sensitive land uses. However, given the fluid dynamics likely to occur during the abandonment processes, this analysis conservatively does not take any quantified reduction associated

⁴² FHWA Noise Barrier Design Handbook, Terminology, July 14, 2011.

⁴³ FHWA Noise Barrier Design Handbook, Table 4, July 14, 2011.

with these techniques. Additionally, all abandonment activities that occur as a result of the Ordinance would be conducted in accordance with LAMC Section 41.40, which prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. to 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). Thus, all activities generating temporary noise levels would be limited to the less noise-sensitive daytime hours. Based on these reasons, and with the implementation of **Mitigation Measure NOI-1**, the Ordinance would not result in the generation of a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. As such, temporary noise impacts would be less than significant.

Long-Term Noise

As discussed in the Project's *Noise and Vibration Technical Report* (see **Appendix B** to this Initial Study), existing oil and gas well operations contribute to the ambient noise levels at receptors in proximity to active wells and throughout the City as a whole. The types of noise associated with oil and gas operations can be complex in nature, due to a wide variety of sources. Some of these noises are intermittent, some are continuous, and many vary in their intensity. Certain sources, such as compressor stations, produce low frequency noise (LFN), which is typically heard as a low rumble. There are also numerous source-dependent and subjective factors that may influence health outcomes, such as noise sensitivity and noise reduction technologies employed at specific locations. As shown in Table 3 of the Project's *Noise and Vibration Technical Report* (see **Appendix B** to this Initial Study), average noise levels from oil and gas production activities range from approximately 58 dBA to 90 dBA, depending on the activity and setback distances. In addition to these noise sources, other existing noise sources associated with well operations throughout the City include operator worker trips (i.e., motor vehicle noise) to and from well locations, and well maintenance related activities (i.e., fire clearance per LAFD and operations maintenance/inspections per CalGEM and other agency requirements). Upon full implementation of the Ordinance, noise sources associated with oil and gas production would be removed within the City, and long-term noise levels would likely be decreased compared to existing noise levels associated with oil and gas production. As such, the Ordinance would not result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the

local general plan or noise ordinance, and long-term noise impacts would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact.

Similar to the short-term and temporary noise discussion provided above, activities associated with well abandonment also have the potential to generate short-term and temporary groundborne vibration levels at sensitive receptors located in proximity to the wells. Based on the parameters described previously and guidance from the FTA's *Transit Noise and Vibration Impact Assessment Manual*,⁴⁴ groundborne vibration levels associated with abandonment activities are presented in **Table 13, Temporary Vibration Levels During Well Abandonment**. As shown in **Table 13**, groundborne vibration levels were estimated at distances of up to 50 feet, 75 feet and 100 feet to characterize potential vibration levels that may be experienced at sensitive receptors located in proximity to oil and gas wells throughout the City. **Table 13** illustrates that short-term and temporary vibration levels would not have the potential to exceed Caltrans' standards for building damage (PPV) or the FTA's standards for human annoyance (VdB). As such, the Ordinance would not result in the generation of excessive groundborne vibration levels, and these impacts would be less than significant.

Table 13
Temporary Vibration Levels During Well Abandonment

Sensitive Receptor Location	Distance to Well (feet)	Vibration Standards PPV/VdB ^a	Estimated Vibration Levels PPV/VdB
1. Sensitive Receptors at 50 Feet	50	0.25/80	0.03/78
2. Sensitive Receptors at 75 Feet	75	0.25/80	0.02/73
3. Sensitive Receptors at 100 Feet	100	0.25/80	0.01/69

^a The vibration standards applied are based on the FTA and Caltrans standards provided previously in **Table 5** and **Table 6** herein.

Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this Initial Study.

⁴⁴ Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. See **Appendix B** to this report for vibration calculations.

- c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact.

Three airports are located within the City of Los Angeles: two public and one general aviation. Respectively, they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. There are three inactive plugged wells located within one mile of LAX. As these wells are plugged (i.e., no oil and gas extraction occurring), there would be no changes to the existing conditions at these locations. Thus, the Ordinance would not expose people residing or working in the area of oil wells to excessive noise levels associated with a private airstrip or public use airport. No impact would occur.

XIV. POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				

No Impact.

The purpose of the Ordinance is to terminate oil extraction in the City. No new permanent structures would be constructed as part of the Project. The Ordinance does not regulate redevelopment of any well sites, as such analysis of future land uses that may induce population growth would be speculative at this time. As such, the Ordinance would not

result in unplanned population growth either directly (by proposing new homes or businesses) or indirectly (through new infrastructure).

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact.

The Ordinance pertains to the termination of oil and gas drilling uses citywide and would not involve changes to any existing residential land uses. It would not displace any residents, remove existing housing, or necessitate the construction of replacement housing elsewhere. Therefore, no impacts would occur.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Fire protection?				
b) Police protection?				
c) Schools?				
d) Parks?				
e) Libraries?				

Less than Significant Impact.

The Ordinance pertains to the termination of oil and gas drilling uses citywide and would not involve changes to any existing land uses or the construction of any residential or commercial uses which might generate needs for additional public services. The Project will not result in substantial adverse impacts related to the provision of public services, including fire, police, schools, parks or other public facilities and would not require the construction or physical alteration of any government facility providing public services. The Ordinance does not change the existing City zoning or General Plan designations for the well sites and, therefore, changes to land uses or population densities that determine the demand for public services would remain unchanged.

LAFD oversees some well maintenance and well abandonment activities, and as such, there will be a need for inspections at sites as wells are abandoned. However, LAFD is currently performing this work and the cessation of oil drilling would not place additional demand on the LAFD as well abandonment would occur incrementally over the 20 year (or more) amortization period. Further, as wells are abandoned and the number of active well sites decreases, demand on LAFD personnel would be reduced. Impacts related to public services including police and fire protection, schools, parks or libraries would be less than significant, no mitigation is required.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?
- b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact.

The Ordinance pertains to the termination of oil and gas drilling uses citywide and would not involve changes to any existing residential land uses. It would not displace any residents, remove existing housing, or necessitate the construction of replacement housing elsewhere. The Ordinance does not change the existing City zoning or General Plan designations for the well sites and, therefore, changes to land uses or population densities that determine the demand for recreational facilities would remain unchanged. The Ordinance does not regulate redevelopment of any well sites, as such analysis of future land uses that may increase demand on recreational facilities would be speculative at this time. No impact would occur.

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict or be inconsistent with <i>CEQA Guidelines</i> Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				

No Impact.

In general, transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. Conversely, a project would not be shown to result in an impact merely based on whether a project would not implement a particular program, plan, policy, or ordinance. Many of these programs must be implemented by the City itself over time, and over a broad area, and it is the intention of this threshold test to ensure that proposed development projects and plans do not preclude the City from implementing adopted programs, plans and policies. The Ordinance would not conflict with the City's Mobility Plan as no new permanent roadways or road modifications would be constructed as a result of the cessation of oil extraction. No impact would occur.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

No Impact.

The State of California Governor's Office of Planning and Research (OPR) issued proposed updates to the *CEQA Guidelines* in November 2017 and an accompanying technical advisory guidance finalized in December 2018 (OPR Technical Advisory) that amends the Appendix G threshold for significance for transportation impacts to delete reference to vehicle delay and level of service and instead refer to Section 15064.3, subdivision (b)(1) of the *CEQA Guidelines* asking if the project will result in a substantial increase in vehicle miles traveled (VMT). The California Natural Resources Agency certified and adopted the *CEQA Guidelines* (Public Resources Code 21000–21189) in December of 2018 and are now in effect. Accordingly, the City of Los Angeles has adopted significance criteria for transportation impacts based on VMT for land use projects and plans in accordance with the amended Appendix G threshold for significance. The City of Los Angeles has developed specific thresholds for land use projects and plans, neither of which are applicable to this ordinance.

The Ordinance would not generate new trips. For existing and idle wells, some minimal trips occur to conduct operation and maintenance activities. Once well operations cease, these trips would be reduced or completely eliminated. During the abandonment phase, trips would be generated as workers access the sites to complete the abandonment, however, once this phase is complete, these trips would cease as well. As the Ordinance would not generate net new trips, no impact would occur related to increases in VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact.

The Ordinance would not modify existing roadways or intersections, as such there would be no hazards due to design features or increased conflicts between incompatible uses that would occur as a result of the Ordinance. The Ordinance would not result in changes being made to the local roadways or impede public access on any public right-of-way. As such, the Project would not increase hazards due to a geometric design feature and no impact would occur.

d) Result in inadequate emergency access?

Less than Significant Impact.

The City has designated disaster routes through the Safety Element of the City General Plan. Implementation of the Ordinance would not hinder emergency access or evacuation routes. No changes to emergency routes would occur as part of the Project. While intermittent road closures could occur as a result of abandonment operations, it is not anticipated that such closures would result in substantial delays to service providers. Any lane closures must be approved by LADOT and they would not be approved if substantial delays could result. Typically, LADOT will require a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Therefore, impacts related to emergency response and access as a result of the Ordinance would be less than significant, no mitigation is required.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?				
b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in				

subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact.

The Ordinance provides for the termination of all nonconforming oil uses over a 20-year amortization period. The Ordinance only affects the use of sites for existing oil and gas extraction activities. Most tribal cultural resources are anticipated with buried resources and land valued for association with tribal practices. The Ordinance will not result in excavation of soils or ground disturbance on undisturbed land. Therefore, impacts are anticipated to be less than significant.

Assembly Bill 52 (AB 52) established a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074, as part of CEQA. As specified in AB 52, lead agencies must provide notice inviting consultation to California Native American tribes that are traditionally and culturally affiliated with the geographic area of a proposed ordinance if the Tribe has submitted a request in writing to be notified of proposed ordinances. The Tribe must respond in writing within 30 days of the City's AB 52 notice. In accordance with AB 52, on August 16, 2022, notice of the Ordinance has been provided to tribes who have requested such notice in the City of Los Angeles. As of the date of the publication of this document, the Gabrieleno Band of Mission Indians – Kizh Nation, and the Fernandeño Tataviam Band of Mission Indians have requested consultation. Consultation with the Gabrieleno Band of Mission Indians – Kizh Nation is ongoing, while consultation with the Fernandeño Tataviam Band of Mission Indians closed on September 2, 2022.

XIX. UTILITIES AND SERVICE SYSTEMS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Would the project:

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| <p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				

Less than Significant Impact.

Wastewater generated in the City is primarily treated at the Hyperion Treatment Plant in Playa del Rey. Wastewater reclamation plants that comprise the Hyperion Service Area have a total design capacity of 580 million gallons of wastewater per day (MGD). The RWQCB regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated in the City. LADWP is the primary provider of water and electric services for the City of Los Angeles, servicing more than four million customers.

Implementation of the Ordinance would not increase demand for water, wastewater, electrical power, natural gas, or telecommunication facilities. Nor would the Ordinance increase storm water runoff. The Ordinance does not affect natural gas managed by a

public utility. As stated in **Mineral Resources**, the City is moving away from petroleum and has implemented numerous goals and policies that support this shift. Further, as stated in **Greenhouse Gases**, the State is also mandating a shift from petroleum. Due to the small amount of oil that is extracted within the City (approximately two percent of the State total) and due to the incremental nature of the ordinance, no new or expanded facilities would be necessary. No impact would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

No Impact.

The Ordinance would not create new demand for water supplies as no reasonably foreseeable future development would occur as a result of the Ordinance. No impact would occur.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact.

The Ordinance would not create new demand for wastewater treatment as no reasonably foreseeable future development would occur as a result of the Ordinance. No impact would occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

No Impact.

The Ordinance would not generate solid waste in excess of state or local standards as no reasonably foreseeable future development would occur as a result of the Ordinance. No impact would occur.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact.

All abandonment activities that would occur as a result of the Ordinance would be conducted in compliance with local and state regulations. While it is unlikely that any significant solid waste would be generated as a result of the Ordinance, all disposals would occur in accordance with local and state regulations. No impact would occur.

XX. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				

Less than Significant Impact.

The City has designated disaster routes through the Safety Element of the City General Plan. Implementation of the Ordinance would not hinder emergency access or evacuation routes. No changes to emergency routes would occur as part of the project. While intermittent road closures could occur as a result of abandonment operations, it is not anticipated that such closures would result in substantial delays to service providers. Any lane closures must be approved by LADOT and they would not be approved if substantial

delays could result. Typically, LADOT will require a construction traffic management plan, including use of flag personnel to help direct traffic around any roadway closures. Therefore, impacts related to emergency response and access as a result of the Ordinance would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact.

The Ordinance does not include the construction or maintenance of any structures that would pose a fire risk. There are currently 21 active wells and 2 idle wells located in the City's designated Very High Fire Hazard Severity Zone. As described throughout this document, any well abandonment activities would occur in accordance with local and state regulations to ensure proper protocols are followed. With compliance with existing regulations governing well abandonment, no impact would occur.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact.

The Project is an ordinance and does not require the installation of any infrastructure that could exacerbate fire risks. As described throughout this document, any well abandonment activities would occur in accordance with local and State regulations to ensure proper protocols are followed. Well abandonment activities are anticipated to use existing infrastructure on site to complete the abandonment process with limited trucks accessing the wells to plug the wells. With compliance with existing regulations governing well abandonment, no impact would occur.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact.

The Ordinance does not include any structures that would be susceptible to fire or those that would increase fire risk. As a result, there would be no risk of downslope or downstream flooding or landslides. As described throughout this document, any well abandonment activities would occur in accordance with local and state regulations to

ensure proper protocols are followed. With compliance with existing regulations governing well abandonment, no impact would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				

Less than Significant Impact.

For the reasons stated in this Initial Study, the Ordinance would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California history or prehistory. Neither the implementation of the Ordinance nor the oil well abandonment process will involve the disturbance of previously undisturbed land. As discussed in this Initial Study, potential impacts related to biological, archaeological, paleontological, and tribal cultural resources would be less than significant. No further analysis is required.

b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact.

For the reasons stated in this Initial Study, implementation of the Ordinance would not result in any potentially significant impacts and would not have the potential to contribute to significant cumulative impacts. The impacts associated with individual well abandonments have been found to be less than significant. Abandonment activities associated with the citywide phase out of oil and gas drilling are anticipated to be amortized across a 20-year period such that the combined impacts of well cessation and abandonment across the City will not be cumulatively considerable. Impacts would be less than significant and no further analysis is required.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact.

As identified throughout the analysis, the Ordinance would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant.

5 CONCLUSION

Based upon the information set forth above, and the substantial evidence contained in the whole of the record of proceedings, the City has determined that with the implementation of the feasible mitigation measures set forth in this Initial Study the

adoption of this Ordinance will not have a significant effect on the environment and a Mitigated Negative Declaration may be adopted.

APPENDIX A

Air Quality and Greenhouse Gas Emissions Technical Report

City of Los Angeles
Oil and Gas Drilling Ordinance
Air Quality and
Greenhouse Gas Emissions
Technical Report

September 2022

Prepared for:

City of Los Angeles
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TABLE OF CONTENTS

Section	Page
1.0 Introduction.....	1
1.1 Project Location	1
1.2 Project Description	2
2.0 Air Quality	6
2.1 Air Quality Setting	6
2.2 Ambient Air Quality	9
2.3 Existing Oil & Gas Air Quality Emissions	18
2.4 Regulatory Framework.....	20
2.5 Thresholds and Methodology.....	34
2.6 Project Impacts.....	39
3.0 Greenhouse Gas	47
3.1 Greenhouse Gas Setting.....	47
3.2 Regulatory Framework.....	55
3.3 Thresholds and Methodology.....	86
3.4 Project Impacts.....	89

LIST OF FIGURES

Figure	Page
1 South Coast Source Receptor Areas in the City of Los Angeles	14

LIST OF TABLES

Table	Page
1 Criteria Pollutants Summary of Common Sources and Effects	9
2 Ambient Air Quality Standards	11
3 Air Quality Standard Attainment Statuses for the Los Angeles County Portion of SCAB	12
4 Air Monitoring Ambient Pollutant Concentrations by Source Receptor Area	15
5 Existing Oil & Gas Air Quality Emissions – Pounds per Day	19
6 City of Los Angeles Safety Element.....	33
7 South Coast AQMD Air Quality Significance Thresholds	36
8 Local Significance Thresholds By SRA – Pounds per Day.....	38
9 Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day	42
10 Avoided Oil & Gas Air Quality Emissions – Pounds per Day.....	43
11 Localized Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day	45
12 Atmospheric Lifetimes and Global Warming Potential for Greenhouse Gases	50
13 California Greenhouse Gas Emissions Inventory	54
14 Required Estimated Statewide Greenhouse Gas Emissions Reductions	72
15 Oil & Gas Well Abandonment GHG Emissions (Per Well)	90
16 Avoided Oil & Gas GHG Emissions	91

Appendices

- A Sensitive Receptors
- B Air Quality & GHG Technical Data

1.0 INTRODUCTION

This Air Quality and Greenhouse Gas Technical Report describes the potential air quality and greenhouse gas (GHG) impacts of the proposed Oil and Gas Drilling Ordinance (Ordinance or Project) to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones within the City of Los Angeles (City). This report has been prepared by Impact Sciences, Inc. to support the Project's environmental documentation being prepared pursuant to the California Environmental Quality Act (CEQA). This analysis considers both the temporary air quality and GHG impacts that would result from the Ordinance and the long-term impacts associated with the implementation of the Ordinance.

1.1 PROJECT LOCATION

The Project is a citywide code amendment applicable within the boundaries of the City. The City has an approximate land area of 465 square miles (297,600 acres) with an estimated population of nearly 4.0 million residents in 2020 (3,898,747), according to the 2020 Census. The City lies within Los Angeles County which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents (10,014,009), according to the 2020 Census. The City is divided into 15 Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

According to August 2022 data from the California Geologic Energy Management division (CalGEM), the City has 26 oil and gas fields that intersect city boundaries and 5,273 oil and gas wells. There are approximately 641 active, 1,350 idle, 35 canceled, and 3,247 plugged wells.¹ Of the City's idle wells, as of July 2022, 56 are orphan wells likely to have no responsible solvent operator. There are oil and gas facilities in nearly every section of the City.² While some wells are situated in heavy industrial areas, others are located within residential neighborhoods and amongst community parks and schools. Much of the existing oil drilling and extraction is within underserved communities throughout the City.

Wells are found in nearly all parts of the City including but not limited to the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando Valley. While some wells are situated in heavy industrial areas, others are located in neighborhoods within

¹ An active well is an oil well that has been drilled and completed, an idle well is inactive and not producing, but capable of being reactivated, a canceled well is one where a well permit was canceled prior to drilling, and a plugged well has been plugged and sealed to current standards.

² There are two gas storage fields within the City, the Aliso Canyon and the Playa Del Rey Fields, which are both operated by the Southern California Gas Company (SoCalGas). SoCalGas is the primary operator of underground natural gas fields, natural gas storage wells, and natural gas transmission facilities within the City. No natural gas wells operated by public utilities would be impacted by the Ordinance.

close proximity to residences, schools, and other sensitive uses. For a list of sensitive receptors located in proximity to wells throughout the City, please refer to **Appendix A** to this report.

1.2 PROJECT DESCRIPTION

The Project is a proposed ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to (1) eliminate the provisions of the LAMC that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; (2) end by-right oil and gas extraction in the M3-Heavy Industrial Zones; (3) declare existing oil and gas extraction within the City a nonconforming use to terminate within 20 years; and (4) prohibit new or expanded oil and gas extraction activities (such as the drilling of new wells or the redrilling or deepening of existing wells). The Ordinance permits maintenance of the wells that the Zoning Administrator determines is necessary to protect public health and safety or the environment. Twenty years from the effective date of the Ordinance, all nonconforming oil and gas extraction uses will terminate.

This Ordinance is not applicable to (1) common carrier oil pipelines intended for regionally-coordinated transport of hydrocarbons; (2) service stations or like uses; (3) refineries; and (4) oil and injection wells that are verified to be plugged and abandoned in accordance with all applicable local, state, and federal laws, rules and regulations, including the California Statutes and Regulations overseen by the California Geologic Energy Management division (CalGEM), and LAFD and for which the well pad has been restored suitably for its subsequent use, and (5) any well operated by a public utility regulated by the California Public Utilities Commission, including those operating at the Aliso Canyon and Playa Del Rey Gas Storage Fields.

The Ordinance does not set a specific timetable for the closure and abandonment of wells, regulate the abandonment of oil wells that have permanently ceased operation, or mandate or regulate the remediation of well sites where extraction has terminated permanently.³

The Ordinance will make existing oil and gas drilling operations legally nonconforming uses in the City, subject to a 20-year amortization period. Existing oil and gas extraction activities may continue to operate until the end of the amortization period after which time all drilling-related activities must cease. After a well ceases operation, current regulations require that the well be abandoned and plugged. However, the current regulations do not establish a set time period by which the abandonment process must be

³ Public Resources Code Section 21000 requires that a lead agency identify all feasible mitigation measures that will avoid or substantially lessen the significant environmental effects of the project. This MND identifies areas of potentially significant impacts that would occur as a result of abandonment activities (See Noise, Geology and Soils). In accordance with CEQA, mitigation measures are proposed where such impacts could be reduced by their imposition.

completed after a well ceases operation. As stated above, the Ordinance does not regulate abandonment when well operations permanently cease.

Currently it is unknown as to how many oil wells will permanently cease operations prior to the 20 year expiration date. This is because the time period that each of the City's approximately 1,991 active and idle wells will permanently cease extraction and undergo abandonment depends on a number of individual factors. For example, upon the Ordinance becoming effective, some operators may choose to conclude operations immediately, while others may have contractual obligations to the landowners of the drilling sites and operate for a few years before the site is abandoned. Others may continue to operate until the end of the 20-year amortization period. However, once a well permanently ceases operation, there is a financial and economic incentive for the oil well operator to complete the abandonment process to reduce the costs of maintaining the well site. Therefore, because there is no reasonable way to accurately predict the timeline for cessation and abandonment at the individual level, this analysis instead assumes all oil drilling will cease 20 years from the effective date of the Ordinance as required. Abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe.

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated above, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. When a well is shut down, termination and abandonment activities will generally include (1) the cessation of production and drilling operations; (2) the closure and plugging of all oil and gas wells, including water flooding injection wells, except injection wells as permitted and demonstrated to be active and necessary by CalGEM; and (3) the plugging/capping of subsurface pipelines. Neither implementation of the Ordinance nor the oil well abandonment process should require excavation of previously undisturbed land and no new permanent structures would be constructed as part of the Project.

Termination activities of nonconforming oil and gas extraction must adhere to all applicable local, state, and federal laws, regulations, rules and standards, including the California Statutes and Regulations and all other requirements overseen by CalGEM as the principal regulatory authority for the closure of oil and gas extraction and production sites. Termination and abandonment activities will occur within previously disturbed and developed areas of the properties that encompass oil and gas extraction activities. In some cases, new access points may be necessary to allow for ingress/egress of equipment necessary to complete the abandonment of wells. However, no new permanent roads or permanent changes to existing roads would be necessary as part of the Project.

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.⁴ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. CalGEM conducts inspections at certain milestones for this scope of work, including the following:

- Operators conduct a series of pressure tests on the wells to identify that there are no leaks or that the pressure is unsafe to work on the well. A test to measure any levels of hydrogen sulfide is common.
- Operators use a drilling or maintenance rig to work on the well and prepare blowout prevention equipment for the well that will be plugged.
- CalGEM inspects the blowout prevention equipment to ensure that it is safe for the operator to continue with plugging and abandonment work.
- Operators use the rig to pull out various cables, tubing, and other connections from the well casing.
- Operators may require the use of brine water to clean out different segments of the well. If no debris or sand is observed, then the operators continue using the rig to remove cables, tubing, and more connections from the well.
- After the operator has removed the sufficient amount of tubings, casing, and connections and there are minimal amounts of debris observed, then the operator will bring a cement truck to begin pouring fresh water and cement mix down the well. CalGEM is required to observe this first segment of pouring

⁴ When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

as the inspector is looking to observe that the bottom hole is filled with the appropriate amount of cement.

- The operator continues to remove casings and tubings with support of the rig while also pouring cement down the well at depths deemed safe and clear enough to pour cement. Pressure testing of the well is frequently conducted to identify any safety risks.
- As the work nears the top segment of the well, the operator continues to use the rig and cement trucks are brought to the drill site to fill the well with cement. The ending segment can include up to 600 cubic feet of cement into the well's casings in order to displace any well fluids or debris. The operator will fill the well casing to the near very top and this process is observed by CalGEM and by the Los Angeles Fire Department.
- At the conclusion, the operator removes any blowout prevention equipment from the rig and the well is closed and steel welded with the API Number and the LAFD Well Number identified on the top cover.

Given the varied timeline of individual well abandonment and the fact the Ordinance does not establish any regulations related to well site remediation or redevelopment (except where mitigation measures are required to reduce identified potentially significant impacts), it would be speculative to contemplate when site remediation would occur after the wells are abandoned and the types of redevelopment and future land uses that may occur on former drill sites. What might get built and at what intensity or scale is not possible to identify or analyze at this time. Therefore, the scope of analysis in this Initial Study is limited to (1) cessation of oil and gas extraction in the city and (2) abandonment activities that are reasonably foreseeable. The analysis does not examine impacts from remediation and/or future development. Those impacts would be analyzed in subsequent environmental analyses at either the programmatic or project level.

2.0 AIR QUALITY

2.1 AIR QUALITY SETTING

South Coast Air Basin

South Coast Air Basin Characteristics

The California Air Resources Board (CARB) divides the state into air basins that share similar meteorological and topographical features. The City of Los Angeles is located within the South Coast Air Basin (SCAB). The SCAB is the geographic region over which the South Coast Air Quality Management District (SCAQMD) has regulatory jurisdiction and encompasses 6,745 square miles covering all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

Temperature and Precipitation

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. It is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. This usually mild climatological pattern is interrupted occasionally by periods of extremely hot weather, winter storms, or Santa Ana winds. The annual average temperature varies little throughout the SCAB region, ranging from the low 60s to the high 80s, measures in degrees Fahrenheit (F°). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas.

In contrast to a very steady pattern of temperature, rainfall is seasonally and annually highly variable. Almost all annual rains fall between November and April. Summer rainfall is normally restricted to widely scattered thundershowers near the coast, with slightly heavier shower activity in the east and over the mountains.

Humidity

Although the SCAB has a semiarid climate, the air near the earth's surface is typically moist because of the presence of a shallow marine layer. Except for infrequent periods when dry, continental air is brought into the SCAB by offshore winds, the "ocean effect" is dominant. Periods of heavy fog, especially along the

coast, are frequent, and low clouds, often referred to as high fog, are a characteristic climate feature. Annual average humidity is 70 percent at the coast and 57 percent in the eastern portions of the SCAB.

Wind

Wind patterns across the south coastal region are characterized by westerly or southwesterly onshore winds during the day and by easterly or northeasterly breezes at night. Wind speed is higher during the dry summer months than during the rainy winter.

Between periods of wind, air stagnation may occur in both the morning and evening hours. Air stagnation is one of the critical determinants of air quality conditions on any given day. During the winter and fall, surface high-pressure systems over the SCAB, combined with other meteorological conditions, can result in very strong, downslope Santa Ana winds. These winds normally continue a few days before predominant meteorological conditions are reestablished.

The mountain ranges to the east affect the diffusion of pollutants by inhibiting the eastward transport of pollutants. Air quality in the SCAB generally ranges from fair to poor and is similar to air quality in most of coastal Southern California. The entire region experiences heavy concentration of air pollutants during prolonged periods of stable atmospheric conditions.

Inversions

In conjunction with the two characteristic wind patterns that affect the rate and orientation of horizontal pollutant transport, two similarly distinct types of temperature inversions control the vertical depth through which pollutants are mixed. These inversions are the marine/subsidence inversion and the radiation inversion. The height of the base of the inversion at any given time is known as the “mixing height.”

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high air masses in the lower atmosphere that effectively trap pollutants near the Earth’s surface by limiting vertical mixing, especially in the summer. Atmospheric temperature typically decreases with altitude. However, under inversion conditions, temperature increases as altitude increases, thereby preventing air close to the ground from mixing with the air above it. The combination of winds and inversions is a critical determinant leading to highly degraded air quality in the summer and generally good air quality in the winter in Los Angeles.

Air Pollutants of Concern

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards for outdoor concentrations. The federal and state standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons such as children, pregnant women, and the elderly, from illness or discomfort. Criteria air pollutants include ozone (O₃), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter 2.5 microns or less in diameter (PM_{2.5}), particulate matter ten microns or less in diameter (PM₁₀), and lead (Pb). Note that reactive organic gases (ROGs), which are also known as reactive organic compounds (ROCs) or volatile organic compounds (VOCs), and nitrogen oxide (NO_x) are not classified as criteria pollutants. However, ROGs and NO_x are widely emitted from land development projects and participate in photochemical reactions in the atmosphere to form O₃; therefore, NO_x and ROGs are relevant to the proposed project and are of concern in the air basin and are listed below along with the criteria pollutants. Sources and health effects commonly associated with criteria pollutants are summarized in **Table 1, Criteria Pollutants Summary of Common Sources and Effects**.

Table 1
Criteria Pollutants Summary of Common Sources and Effects

Pollutant	Major Man-Made Sources	Human Health & Welfare Effects
Carbon Monoxide (CO)	An odorless, colorless gas formed when carbon in fuels is not burned completely; a component of motor vehicle exhaust.	Reduces the ability of blood to deliver oxygen to vital tissues, affecting the cardiovascular and nervous system. Impairs vision, causes dizziness, and can lead to unconsciousness or death.
Nitrogen Dioxide (NO ₂)	A reddish-brown gas formed during fuel combustion for motor vehicles and industrial sources. Sources include motor vehicles, electric utilities, and other sources that burn fuel.	Respiratory irritant; aggravates lung and heart problems. Precursor to ozone and acid rain. Contributes to global warming and nutrient overloading which deteriorates water quality. Causes brown discoloration of the atmosphere.
Ozone (O ₃)	Formed by a chemical reaction between volatile organic compounds (VOC) and nitrous oxides (NO _x) in the presence of sunlight. VOCs are also commonly referred to as reactive organic gases (ROGs). Common sources of these precursor pollutants include motor vehicle exhaust, industrial emissions, gasoline storage and transport, solvents, paints, and landfills.	Irritates and causes inflammation of the mucous membranes and lung airways; causes wheezing, coughing, and pain when inhaling deeply; decreases lung capacity; aggravates lung and heart problems. Damages plants; reduces crop yield. Damages rubber, some textiles, and dyes.
Particulate Matter (PM ₁₀ & PM _{2.5})	Produced by power plants, steel mills, chemical plants, unpaved roads and parking lots, wood-burning stoves and fireplaces, automobiles, and others.	Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease. Impairs visibility (haze).
Sulfur Dioxide (SO ₂)	A colorless, nonflammable gas formed when fuel containing sulfur is burned; when gasoline is extracted from ore. Examples are petroleum refineries, cement manufacturing, metal processing facilities, locomotives, and ships.	Respiratory irritant; aggravates lung and heart problems. In the presence of moisture and oxygen, sulfur dioxide converts to sulfuric acid which can damage marble, iron, and steel. Damages crops and natural vegetation. Impairs visibility. Precursor to acid rain.

Source: CAPCOA, Health Effects. Available: <http://www.capcoa.org/health-effects/>

2.2 AMBIENT AIR QUALITY

Air pollutant emissions in the SCAB are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbeque lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains,

race cars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The SCAB has low mixing heights and light winds, which help to accumulate air pollutants. Exhaust emissions from mobile sources generate the majority of ROG, CO, NO_x, and SO_x both in the SCAB generally and specifically the Los Angeles County portion of the SCAB. Area-wide sources generate the most airborne particulates (i.e., PM₁₀ and PM_{2.5}) in both the SCAB and Los Angeles County. The determination of whether a region's air quality is healthful or unhealthful is made by comparing contaminant levels in ambient air samples to national and state standards. Measurements of ambient concentrations of criteria pollutants are used by the U.S. EPA and the CARB to assess and classify the air quality of each air basin, county, or, in some cases, a specific urbanized area.

The federal Clean Air Act (CAA) requires U.S. EPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant (O₃, NO₂, CO, SO₂, PM₁₀, PM_{2.5}, and Pb) based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. The NAAQS are summarized in **Table 2**. The classification is determined by comparing actual monitoring data with national standards. If a pollutant concentration measured over time in a particular area consistently remains below the standard level, the area is classified as being in "attainment" of the air quality standard. If the pollutant concentration exceeds the standard, the area is classified as a "nonattainment" area. If the agencies are unable to gather sufficient data to determine whether the standard is met in an area, the area is typically designated as "unclassified." The U.S. EPA has classified the Los Angeles County portion of the SCAB as a nonattainment area for O₃, PM_{2.5}, and Pb, as presented in **Table 2**, below.

Table 2
Ambient Air Quality Standards

Air Pollutant	Averaging Time	State Standard	Federal Standard
Ozone (O ₃)	1-Hour	0.09 ppm	-
	8-Hour	0.07 ppm	0.07 ppm
Carbon Monoxide (CO)	1-Hour	20.0 ppm	35 ppm
	8-Hour	9.0 ppm	9 ppm
Nitrogen Dioxide (NO ₂)	1-Hour	180 ppb	100 ppb
Sulfur Dioxide (SO ₂)	1-Hour	250 ppb	75 ppb
	24-Hour	40 ppb	140 ppb
Sulfates (SO ₄)	24-Hour	25 µg/m ³	-
	24-Hour	-	35 µg/m ³
Fine Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³ (Primary)
			15 µg/m ³ (Secondary)
Respirable Particulate Matter (PM ₁₀)	24-Hour	50 µg/m ³	150 µg/m ³
Lead (Pb)	30-Day Average	1.5 µg/m ³	-
	Calendar Quarter	-	1.5 µg/m ³ (for certain areas)
	Rolling 3-Month Average	-	0.15 µg/m ³

Source: CARB, *Ambient Air Quality Standards*, 2016. Available at: <https://ww2.arb.ca.gov/sites/default/files/2020-07/aaqs2.pdf>, accessed November 2021.

Notes: ppm = parts per million; ppb = parts per billion; µg/m³ = microgram per cubic meter.

The California Clean Air Act (CCAA) requires the CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the California Ambient Air Quality Standards (CAAQS) have been achieved. As shown in **Table 2**, the CAAQS are generally more stringent than the NAAQS; and additional state standards are specified for sulfates, hydrogen sulfide (H₂S), vinyl chloride, and visibility-reducing particles. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O₃, PM_{2.5}, and PM₁₀ as shown in **Table 3**.

Table 3
Air Quality Standard Attainment Statuses for the Los Angeles County Portion of SCAB

Pollutant	California Ambient Air Quality Standards	National Ambient Air Quality Standards
Ozone (O ₃) (1-Hour)	Nonattainment	Nonattainment (Extreme)
Ozone (O ₃) (8-Hour)	Nonattainment	Nonattainment (Extreme)
Carbon Monoxide (CO) (1-Hour and 8-Hour)	Attainment	Attainment (Maintenance)
Nitrogen Dioxide (NO ₂) (1-Hour)	Attainment	Unclassified/Attainment
Nitrogen Dioxide (NO ₂) (8-Hour)	Attainment	Attainment (Maintenance)
Sulfur Dioxide (SO ₂) (1-Hour)	Attainment	Pending – Expect Unclassified/Attainment
Sulfur Dioxide (SO ₂) (24-Hour)	Attainment	Unclassified/Attainment
Fine Particulate Matter (PM _{2.5}) (24-Hour)	Nonattainment	Attainment (Maintenance)
Fine Particulate Matter (PM _{2.5}) (Annual)	Nonattainment	Not Applicable
Respirable Particulate Matter (PM ₁₀) (24-Hour)	Not Applicable	Nonattainment (Serious)
Respirable Particulate Matter (PM ₁₀) (Annual)	Nonattainment	Nonattainment (Moderate)
Lead (Pb)	Attainment	Nonattainment (Partial)

Source: CARB, *Ambient Air Quality Standards Designation Tool*, 2020. Available at: <https://ww2.arb.ca.gov/aaqs-designation-tool>, accessed November 2021.

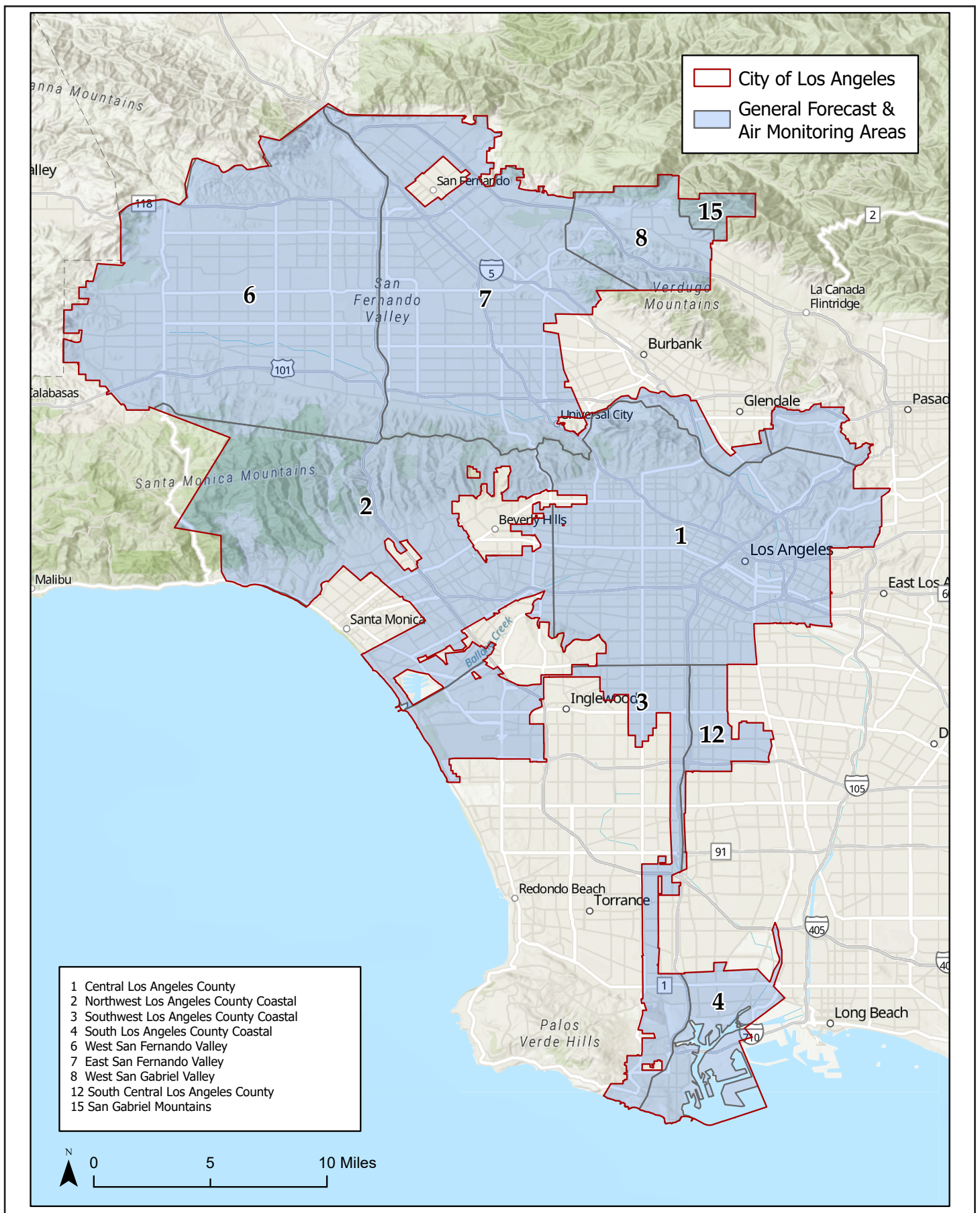
Local Air Quality

Ambient air quality in Los Angeles can be inferred from ambient air quality measurements conducted at nearby air quality monitoring stations. The SCAQMD jurisdiction is divided geographically into 38 source receptor areas (SRAs), wherein 37 monitoring stations operate—one station in each SRA excluding SRA 7—to measure and record concentrations of the regulated pollutants that provide representative air quality conditions in the region. The 38 SRAs are divided based on proximity to air monitoring stations and local meteorological patterns. The purpose of the monitoring station is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS). Ozone and particulate matter (PM₁₀ and PM_{2.5}) are pollutants of particular concern in the SCAB.

The City of Los Angeles encompasses parts of eight SRAs in the Coastal, Metropolitan, San Fernando Valley, and San Gabriel Valley areas (See **Figure 1, South Coast Source Receptor Areas in the City of Los Angeles**). (SRA 1, described as Central Los Angeles County; SRA 2, described as Northwest Los Angeles County Coastal; SRA 3, described as Southwest Los Angeles County Coastal; SRA 4, described as South Los Angeles County Coastal; SRA 6, described as West San Fernando Valley; SRA 7, described as East San

Fernando Valley; SRA 8, described as West San Gabriel Valley; and SRA 12, described as South Central Los Angeles County).

Air quality conditions in the City are characterized by concentrations of air pollutants measured at the monitoring stations located within the City. Each station records concentrations of O₃, CO, NO₂, SO₂, PM₁₀, and PM_{2.5} at timescales that match the corresponding ambient air quality standards. **Table 4** presents the monitored air quality data from each SRA Monitoring Station from 2018 to 2020.



SOURCE: SCAQMD, 2022

FIGURE 1

Table 4
Air Monitoring Ambient Pollutant Concentrations by Source Receptor Area

SRA	Standards ¹	OZONE (O ₃)				NITROGEN DIOXIDE (NO ₂)		RESPIRABLE PARTICULATE MATTER (PM ₁₀)				FINE PARTICULATE MATTER (PM _{2.5})		
		Max 1-hour (ppm)	Max 8-hour (ppm)	Number of days exceeding state 1-hour standard	Number of days exceeding 8-hour standard	Max 1-hour (ppm)	Annual average (ppm)	Max 24-hour (µg/m ³)	Annual average (µg/m ³)	Number of samples exceeding state standard	Number of samples exceeding federal standard	Max 24-hour (µg/m ³)	Annual average (µg/m ³)	Number of samples exceeding federal standard
				0.09 ppm	0.070 ppm					50 µg/m ³	150 µg/m ³			35 µg/m ³
1	2018	0.098	0.073	2	4	0.07	0.018	81	34.1	31	0	43.8	12.58	3
	2019	0.085	0.08	0	0	0.07	0.018	62	25.5	3	0	43.5	10.85	1
	2020	0.185	0.118	14	22	0.062	0.017	77	23	24	0	47.3	12.31	2
2	2018	0.98	0.073	0	2	0.064	0.012	-	-	-	-	-	-	-
	2019	0.086	0.075	0	1	0.048	0.0097	-	-	-	-	-	-	-
	2020	0.134	0.092	6	8	0.0766	0.0106	-	-	-	-	-	-	-
3	2018	0.074	0.065	0	0	0.059	0.0092	45	20.5	0	0	-	-	-
	2019	0.082	0.067	0	0	0.056	0.0095	62	19.2	2	0	-	-	-
	2020	0.117	0.074	1	2	0.059	0.0095	43	22.5	0	0	-	-	-
4 ³	2018	-	-	-	-	-	-	55	23.9	1	0	47.1	11.15	2
	2019	-	-	-	-	-	-	72	21	2	0	30.6	9.22	0
	2020	-	-	-	-	-	-	59	24.9	2	0	39	11.38	1
6	2018	0.12	0.101	14	49	0.057	0.012	-	-	-	-	31	10.32	0
	2019	0.101	0.087	1	6	0.064	0.0107	-	-	-	-	30	9.16	0
	2020	0.142	0.115	14	49	0.057	0.012	-	-	-	-	27.6	10.13	0
7	2018	-	-	-	-	-	-	-	-	-	-	-	-	-
	2019	-	-	-	-	-	-	-	-	-	-	-	-	-
	2020	0.133	0.108	31	49	0.06	0.0145	-	-	-	-	-	-	-
8	2018	0.112	0.09	8	19	0.068	0.014	-	-	-	-	32.5	10.28	0
	2019	0.12	0.098	4	12	0.059	0.013	-	-	-	-	30.9	8.9	0
	2020	0.163	0.115	41	60	0.0612	0.0136	-	-	-	-	34.9	11.06	0
12	2018	0.075	0.063	0	0	0.068	15	-	-	-	-	43	12.96	1
	2019	0.1	0.079	1	1	0.07	0.0141	-	-	-	-	39.5	10.87	1
	2020	0.152	0.115	3	4	0.0723	0.0145	-	-	-	-	43.2	13.57	7

Source: California Air Resources Board, "Air Quality Data Statistics," <http://www.arb.ca.gov/adam/>. 2020. SCAQMD. 2021. Air Quality South Coast Air Quality Management District, <https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year>

¹ Parts by volume per million of air (ppm), micrograms per cubic meter of air (µg/m³), or annual arithmetic mean (aam).

² The 8-hour federal O₃ standard was revised from 0.075 ppm to 0.070 ppm in 2015. The statistics shown are based on the 2015 standard of 0.070 ppm

³ Data collected from SCAQMD Station Number 77.

According to air quality data from SCAQMD Monitoring Stations shown in **Table 4**, concentrations of O₃ exceeded the State 1-hour standard at least once in each of the three years presented in six of the SRAs. Levels of O₃ also exceeded the national and State 8-hour standards at least once in six of the SRAs between 2018–2020. PM₁₀ concentrations did not exceed the 24-hour NAAQS during the three-year period; however, concentrations did exceed the applicable State 24-hour PM₁₀ standard in three of the SRAs between 2018–2020 but did not exceed the Federal 24-hour PM₁₀ standard. PM_{2.5} concentrations exceeded the federal 24-hour standard at least once between 2018–2020 in three of the SRAs. The data demonstrate consistency with the nonattainment designations in **Table 3**, above.

Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. TACs are considered either carcinogenic or noncarcinogenic based on the nature of the health effects associated with exposure to the pollutant. For regulatory purposes, carcinogenic TACs are assumed to have no safe threshold below which health impacts would not occur, and cancer risk is expressed as excess cancer cases per one million exposed individuals. Noncarcinogenic TACs differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis.

There are many different types of TACs, with varying degrees of toxicity. Sources of TACs include industrial processes, such as petroleum refining and chrome-plating operations; commercial operations, such as gasoline stations and dry cleaners; and motor vehicle exhaust. Public exposure to TACs can result from emissions from normal operations, as well as from accidental releases of hazardous materials during upset conditions. The health effects associated with TACs are quite diverse and generally are assessed locally, rather than regionally. TACs can cause long-term health effects such as cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage, or short-term acute effects such as eye watering, respiratory irritation (a cough), running nose, throat pain, and headaches.

To date, CARB has designated 244 compounds as TACs. Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control. The majority of the estimated health risks from TACs can be attributed to a relatively few compounds.⁵

CARB identified diesel particulate matter (DPM) as a TAC. DPM differs from other TACs in that it is not a single substance but rather a complex mixture of hundreds of substances. Diesel exhaust is a complex mixture of particulates and gases produced when an engine burns diesel fuel. DPM is a concern because it

⁵ California Air Resources Board. *CARB Identified Toxic Air Contaminants*. Available online at: <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>, accessed August 15, 2022.

causes lung cancer; many compounds found in diesel exhaust are carcinogenic. DPM includes the particle-phase constituents in diesel exhaust. The chemical composition and particle sizes of DPM vary between different engine types (heavy-duty, light-duty), engine operating conditions (idle, accelerate, decelerate), fuel formulations (high/low sulfur fuel), and the year of the engine. Some short-term (acute) effects of diesel exhaust include eye, nose, throat, and lung irritation, and diesel exhaust can cause coughs, headaches, light-headedness, and nausea. DPM poses the greatest health risk among the TACs. Almost all diesel exhaust particle mass is 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lung.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiovascular diseases.⁶

Residential areas are considered sensitive receptors to air pollutions because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Children are considered more susceptible to health effects of air pollution due to their immature immune systems and developing organs.⁷ As such, schools are also considered sensitive receptors, as children are present for extended durations and engage in regular outdoor activities. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation.

In addition to the numerous parcels zoned for residential uses in proximity to oil wells throughout the City, there are approximately 766 air quality sensitive uses within 100 feet of oil wells.⁸ These sensitive land uses consist of schools, day cares, elder care facilities, adult residential facilities, parks, and hospitals. Please refer to **Appendix A** to this report for more information related to sensitive receptors located in proximity to oil wells.

⁶ California Air Resources Board. *Sensitive Receptor Assessment*. Available online at: <https://ww2.arb.ca.gov/capp-resource-center/community-assessment/sensitive-receptor-assessment>, accessed August 15, 2022.

⁷ Office of Environmental Health Hazard Assessment and The American Lung Association of California. *Air Pollution and Children's Health*. Available online at: <https://oehha.ca.gov/media/downloads/faqs/kidsair4-02.pdf>, accessed August 15, 2022.

⁸ Due to the programmatic nature of this analysis, it is acknowledged that not every sensitive receptor will be identified. However, a good-faith effort at identifying the known sensitive receptors has been included in Appendix A to this report.

Existing Health Risk

The Multiple Air Toxics Exposure Study V (MATES V) is a monitoring and evaluation study conducted by the SCAQMD in SCAB. Originally developed in 1986 and now in its fifth iteration, the MATES V program relied on concentrations of more than 30 TACs—including both gases and particulates—measured at 10 fixed sites throughout the SCAB during the 2018–2019 period in conjunction with a basin-wide TAC emissions inventory and a regional modeling effort to characterize ambient excess carcinogenic risks across the SCAB.⁹ MATES V also included an exploratory analysis of chronic non-cancer health impacts (e.g., cardiovascular, respiratory, neurological health outcomes, etc.) based on the measured concentrations and modeled emissions. The results of MATES V determined that the carcinogenic risk estimated from data collected at the 10 monitoring sites was approximately 40 percent lower on average than the risk that was estimated in MATES IV using monitoring data from the 2012–2013 time period. The estimated SCAB-wide population-weighted cancer risk calculated from the modeling data estimated that the reduction relative to MATES IV was approximately 54 percent, similar to the decrease demonstrated in monitored data. Based on the inhalation exposure pathway only, MATES-V found that the average population-weighted carcinogenic risk in the SCAB declined from 897 per million in 2012–2013 to 424 in a million in 2018–2019.

At the county level, Los Angeles County ambient average inhalation-pathway population-weighted cancer risk decreased from approximately 1,015 per million in MATES IV to 462 per million in MATES V, a reduction of 54 percent, which is similar to the modeled reduction across the SCAB. Accounting for multiple exposure pathways, the highest carcinogenic risk in MATES V was estimated near the Ports of Los Angeles and Long Beach to be approximately 960 per million, and the countywide average for Los Angeles County was approximately 497 per million (approximately 57 percent lower than MATES IV results). The MATES V ambient carcinogenic risk in the City of LA ranges between approximately 670 and 800 per million. According to the MATES V data visualizer, approximately 70 percent of the ambient excess cancer risk is attributed to diesel PM concentrations.

2.3 EXISTING OIL & GAS AIR QUALITY EMISSIONS

Oil and gas operations throughout the City contribute to existing local and regional air quality conditions. Existing operating emissions fall into two general categories: 1) worker commutes and 2) fugitive emissions. Typical emissions from worker commutes (i.e., motor vehicle trips) include ROG, NOx, CO,

⁹ SCAQMD, *MATES-V Final Report, Multiple Air Toxics Exposure Study in the South Coast Air Basin*. August 2021. Available online at: <http://www.aqmd.gov/docs/default-source/planning/mates-v/mates-v-final-report-9-24-21.pdf?sfvrsn=6>, accessed August 16, 2022.

SO_x, PM₁₀ and PM_{2.5}. These emissions were estimated with the use of the California Emissions Estimator Model (CalEEMod). See **Appendix B** to this report.

Fugitive emissions include ROG_s (also referred to as volatile organic compounds) which may include but not be limited to pentane, n-pentane, hexane, ethane, and other longer-chain hydrocarbons. In general, fugitive emissions from oil and gas activities may be attributed to the following primary types of sources: fugitive equipment leaks; process venting; evaporation losses; disposal of waste gas streams (e.g., by venting or flaring), and accidents and equipment failures. Fugitive leaks from piping and equipment are typically small yet detectable emissions from equipment where there are joints, flanges, and seals. Although joints and flanges are typically bolted, small amounts of hydrocarbons may be emitted through leaky joints.

It should be noted that fugitive emissions are difficult to quantify with a high degree of accuracy and there remains substantial uncertainty in the emission factors and calculation methodologies for oil and gas activities. This is due to the numerous types of sources and many variables to be considered. The key emission assessment issues are: (a) use of simple production-based emission factors is susceptible to excessive errors; (b) use of rigorous bottom-up approaches requires expert knowledge to apply and relies on detailed data which may be difficult and costly to obtain; and (c) measurement programs are time consuming and very costly to perform.¹⁰ Nevertheless, **Table 5, Existing Oil & Gas Air Quality Emissions**, has been included as a good-faith effort to illustrate the potential scope of air quality emissions associated with existing oil and gas operations throughout the City. See **Appendix B** to this report for further information related to calculations and assumptions utilized to prepare these estimates.

Table 5
Existing Oil & Gas Air Quality Emissions – Pounds per Day

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Worker Emissions	1.99	3.52	34.80	0.08	2.73	0.53
Fugitive Emissions	807.66	--	--	--	--	--
Total	809.65	3.52	34.80	0.08	2.73	0.53

Source: Impact Sciences, September 2022. See Appendix B to this report.

¹⁰ Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

2.4 REGULATORY FRAMEWORK

Federal

Clean Air Act

Federal Clean Air Act. The Federal Clean Air Act (CAA) was enacted in 1970 and has been amended numerous times in subsequent years, with the most recent amendments occurring in 1990.¹¹ The CAA is the comprehensive federal law that regulates air emissions in order to protect public health and welfare.¹² The U.S. EPA is responsible for the implementation and enforcement of the CAA, which establishes federal National Ambient Air Quality Standards (NAAQS), specifies future dates for achieving compliance, and requires the U.S. EPA to designate areas as attainment, nonattainment, or maintenance. The CAA also mandates that each state submit and implement a State Implementation Plan (SIP) for each criteria pollutant for which the state has not achieved the applicable NAAQS. The SIP includes pollution control measures that demonstrate how the standards for those pollutants will be met. The sections of the CAA most applicable to land use development projects include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).¹³

Title I requirements are implemented for the purpose of attaining NAAQS for criteria air pollutants. **Table 2, Ambient Air Quality Standards**, shows the NAAQS currently in effect for each criteria pollutant. The Air Basin fails to meet national standards for O₃ and PM_{2.5} and, therefore, is considered a federal “non-attainment” area for these pollutants, as shown in **Table 3**. Therefore, the Air Basin is subject to the requirements of demonstrating a path towards attaining the NAAQS as part of the SIP. The NAAQS and the CAAQS, which are generally more stringent, have been set at levels considered safe to protect public health, including the health of sensitive populations and to protect public welfare.

Title II pertains to mobile sources, which includes on-road vehicles (e.g., cars, buses, motorcycles) and non-road vehicles (e.g., aircraft, trains, construction equipment). Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the U.S. EPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_x emissions

¹¹ 42 United States Code §7401 et seq. (1970).

¹² United States Environmental Protection Agency, Summary of the Clean Air Act. Available online at: <https://www.epa.gov/laws-regulations/summary-clean-air-act>, accessed August 16, 2022.

¹³ United States Environmental Protection Agency, Clean Air Act Overview, Clean Air Act Table of Contents by Title, Last Updated January 3, 2017, <https://www.epa.gov/clean-air-act-overview/clean-air-act-text>, accessed August 16, 2022. As shown therein, Title I addresses nonattainment areas and Title II addresses mobile sources.

have been lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

National Emissions Standards for Hazardous Air Pollutants Program

Under federal law, 187 substances are currently listed as hazardous air pollutants (HAPs). Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAPS) program. The EPA is establishing regulatory schemes for specific source categories and requires implementation of the Maximum Achievable Control Technologies (MACT) for major sources of HAPs in each source category. State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are a problem in California. The state has formally identified 244 substances as TACs and is adopting appropriate control measures for each. Once adopted at the state level, each air district will be required to adopt a measure that is equally or more stringent.

National Ambient Air Quality Standards

The federal CAA required the U.S. EPA to establish NAAQS. The NAAQS set primary standards and secondary standards for specific air pollutants. Primary standards define limits for the protection of public health, which include sensitive populations such as asthmatics, children, and the elderly. Secondary Standards define limits to protect public welfare to include protection against decreased visibility, damage to animals, crops, vegetation, and buildings. A summary of the federal ambient air quality standards is shown in **Table 2, Ambient Air Quality Standards**.

State

California Clean Air Act of 1988

The California CAA of 1988 (CCAA) allows states to adopt ambient air quality standards and other regulations provided that they are at least as stringent as federal standards. The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (Cal EPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California, including setting the CAAQS. The CCAA, amended in 1992, requires all air quality management districts (AQMDs) in the state to achieve and maintain the CAAQS. The CAAQS are generally stricter than national standards for the same pollutants and has also established state standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles, for which there are no national standards. CARB also conducts research, compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB also has primary responsibility for the development of California's State

Implementation Plan (SIP), for which it works closely with the federal government and the local air districts.

California Ambient Air Quality Standards

The federal CAA permits states to adopt additional or more protective air quality standards if needed. California has set standards for certain pollutants, such as particulate matter and ozone, which are more protective of public health than respective federal standards. California has also set standards for some pollutants that are not addressed by federal standards. The state standards for ambient air quality are summarized in **Table 2, Ambient Air Quality Standards**.

California State Implementation Plan

The federal CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP). The SIP is a living document that is periodically modified to reflect the latest emissions inventories, plans, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The CAA Amendments dictate that states containing areas violating the NAAQS revise their SIPs to include extra control measures to reduce air pollution. The SIP includes strategies and control measures to attain the NAAQS by deadlines established by the CAA. The EPA has the responsibility to review all SIPs to determine if they conform to the requirements of the CAA.

State law makes CARB the lead agency for all purposes related to the SIP. Local air districts and other agencies prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the EPA for approval and publication in the Federal Register. The 2016 Air Quality Management Plan (2016 AQMP) is the SIP for SCAB. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air in the SCAB and those portions of the Salton Sea Air Basin (SSAB) that are under the SCAQMD's jurisdictions. The 2016 AQMP represents a new approach, focusing on available, proven, and cost effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnerships with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement. The most effective way to reduce air pollution impacts is to reduce emissions from mobile sources. The AQMP relies on regional and multi-level partnerships of governmental agencies at the federal, state, regional, and local level. Those agencies (EPA, CARB, local governments, Southern California Association of Governments [SCAG] and the SCAQMD) are the primary agencies that implement the AQMP programs. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including SCAG's 2016-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), updated emission inventory

methodologies for various source categories, and SCAG's latest growth forecasts. The 2016 AQMP includes integrated strategies and measures to meet the NAAQS.

On September 3, 2020, SCAG's Regional Council unanimously voted to approve and fully adopt Connect SoCal (2020-2045 RTP/SCS). However, the forecasts and measures in the plan have not been incorporated into any applicable air quality plan for the region.¹⁴

California Code of Regulations. The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location. Section 93115 in Title 17 of the CCR states that operations of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emissions standards. In addition, Section 95668 in Title 17 establishes greenhouse gas emission standards for crude oil and natural gas facilities.

California Air Toxics "Hot Spots" Information and Assessment Act (AB 2588)

The California Air Toxics Program is supplemented by the Air Toxics "Hot Spots" program, which became law (AB 2588, Statutes of 1987) in 1987. In 1992, the AB 2588 program was amended by Senate Bill 1731 to require facilities that pose a significant health risk to the community to perform a risk reduction audit and reduce their emissions through implementation of a risk management plan. Under this program, which is required under the Air Toxics "Hot Spots" Information and Assessment Act (Section 44363 of the California Health and Safety Code), facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks when present.

Typically, land development projects generate diesel emissions from construction vehicles during the construction phase, as well as some diesel emissions from small trucks during the operational phase. Diesel exhaust is mainly composed of particulate matter and gases, which contain potential cancer-causing substances. Emissions from diesel engines currently include over 40 substances that are listed by EPA as hazardous air pollutants and by CARB as TACs. On August 27, 1998, CARB identified particulate matter

¹⁴ Southern California Association of Governments. *Adopted Final Connect SoCal (2020-2045 RTP/SCS)*. Available online at: <https://scag.ca.gov/read-plan-adopted-final-plan>, accessed August 16, 2022

in diesel exhaust as a TAC, based on data linking diesel particulate emissions to increased risks of lung cancer and respiratory disease.¹⁵

In March 2015, the OEHHA adopted “The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments” in accordance with the Health and Safety Code, Section 44300. The Final Guidance Manual incorporates the scientific basis from three earlier developed Technical Support Documents to assess risk from exposure to facility emissions. The 2015 OEHHA Final Guidance has key changes including greater age sensitivity in particular for children, decreased exposure durations, and higher breathing rate profiles. Because cancer risk could be up to three times greater using this new guidance, it may result in greater mitigation requirements, more agency backlog, and increased difficulty in getting air permits. Regardless of the change in calculation methodology, actual emissions and cancer risk within South Coast Air Basin has declined by more than 50 percent since 2005.

The CARB provides a computer program, the Hot Spots Analysis and Reporting Program (HARP), to assist in a coherent and consistent preparation of an HRA. HARP2, an update to HARP, was released in March 2015. HARP2 has a more refined risk characterization in HRA and CEQA documents and incorporates the 2015 OEHHA Final Guidance.

Diesel Risk Reduction Program. CARB identified particulate emissions from diesel-fueled engines as TACs in August 1998. Following the identification process, the ARB was required by law to determine if there is a need for further control, which moved us into the risk management phase of the program. CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and the Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines*. The Diesel Advisory Committee approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce DPM emissions.

¹⁵ Diesel exhaust is included within pollutants subject to the hotspot program. Please refer to OEHHA’s Air Toxics Hot Spot Program Risk Assessment Guidelines. <https://oehha.ca.gov/air/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>, accessed August 16, 2022.

Regional

South Coast Air Quality Management District (SCAQMD). The SCAQMD is primarily responsible for planning, implementing, and enforcing air quality standards for the South Coast Air Basin. The Air Basin is a subregion within the western portion of the SCAQMD jurisdiction, as the SCAQMD also regulates portions of the Salton Sea Air Basin and Mojave Desert Air Basin within Riverside County.

Air Quality Management Plan and RTP/SCS. To meet the NAAQS and CAAQS, the SCAQMD has adopted a series of AQMPs, which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the standards in a timely manner. The 2016 AQMP includes strategies to ensure that rapidly approaching attainment deadlines for O₃ and PM_{2.5} are met, and that public health is protected to the maximum extent feasible. The most significant air quality challenge in the Air Basin is to reduce NO_x emissions¹⁶ sufficiently to meet the upcoming O₃ standard deadlines, as NO_x plays a critical role in the creation of O₃. The AQMP's strategy to meet the 8-hour O₃ standard in 2023 should lead to sufficient NO_x emission reductions to attain the 1-hour O₃ standard by 2022. Since NO_x emissions also lead to the formation of PM_{2.5}, the NO_x reductions needed to meet the O₃ standards will likewise lead to improvement of PM_{2.5} levels and attainment of PM_{2.5} standards.^{17 18}

The AQMP also incorporates the transportation strategy and transportation control measures from SCAG's adopted 2016-2040 RTP/SCS (2016-2040 RTP/SCS)¹⁹ Plan. SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. The RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce vehicle miles traveled (VMT), which are contained in the AQMP. The SCAQMD combines its portion of

¹⁶ NO_x emissions are a precursor to the formation of both O₃ and secondary PM_{2.5}.

¹⁷ Estimates are based on the inventory and modeling results and are relative to the baseline emission levels for each attainment year (see Final 2016 AQMP for detailed discussion).

¹⁸ SCAQMD, *Final 2016 AQMP*, 2017. Page ES-2. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>. Accessed August 16, 2022.

¹⁹ SCAG, *Final 2016 RTP/SCP*, 2016. Available online at: <https://scag.ca.gov/sites/main/files/file-attachments/f2016rtpscs.pdf?1606005557>, accessed August 16, 2022.

the AQMP with those prepared by SCAG.²⁰ The RTP/SCS and Transportation Control Measures, included as Appendix IV-C of the 2016 AQMP for the Air Basin, are based on SCAG's 2016-2040 RTP/SCS.

The 2016 AQMP forecasts the 2031 emissions inventories "with growth" based on SCAG's 2016-2040 RTP/SCS. The region is projected to see a 12 percent growth in population, 16 percent growth in housing units, 23 percent growth in employment, and 8 percent growth in vehicle miles traveled between 2012 and 2031. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, state and federal levels.²¹

On September 3, 2020, SCAG's Regional Council adopted the 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS was determined to conform to the federally-mandated state implementation plan (SIP), for the attainment and maintenance of NAAQS standards. On October 30, 2020, CARB also accepted SCAG's determination that the SCS met the applicable state greenhouse gas emissions targets. The 2020-2045 RTP/SCS will be incorporated into the forthcoming 2022 AQMP.

SCAQMD Air Quality Guidance Documents. The SCAQMD published the *CEQA Air Quality Handbook* (approved by the AQMD Governing Board in 1993) to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts.²² The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures for conducting air quality analyses. However, the SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD has provided supplemental guidance on the SCAQMD website.²³

The SCAQMD has also adopted land use planning guidelines in its *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, which considers impacts to sensitive receptors from facilities that emit TAC emissions.²⁴ SCAQMD's siting distance recommendations are the same as those provided by CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity to freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The

²⁰ SCAQMD, Final 2016 AQMP, 2017. Page ES-2. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>, accessed August 16, 2022.

²¹ SCAQMD, Figure 1-4 of the Final 2016 AQMP.

²² South Coast Air Quality Management District, *CEQA Air Quality Handbook* 1993, [http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)), accessed August 16, 2022.

²³ SCAQMD, *Air Quality Analysis Guidance*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook#>, accessed August 16, 2022.

²⁴ South Coast Air Quality Management District, *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*, 2005, <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>. Accessed August 16, 2022.

SCAQMD's document introduces land use-related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

The SCAQMD has published a guidance document called the *Final Localized Significance Threshold Methodology* for CEQA evaluations that is intended to provide guidance when evaluating the localized effects from mass emissions during construction or operation of a project.²⁵ The SCAQMD adopted additional guidance regarding PM_{2.5} emissions in a document called *Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds*.²⁶ The latter document has been incorporated by the SCAQMD into its CEQA significance thresholds and *Final Localized Significance Threshold Methodology*.

SCAQMD Rules and Regulations. The SCAQMD has adopted several rules and regulations to regulate sources of air pollution in the Air Basin and to help achieve air quality standards for projects, which include, but are not limited to the following:

Regulation IV – Prohibitions: This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air emissions, fuel contaminants, start-up/shutdown exemptions and breakdown events. The following is a list of rules which apply to the reasonably anticipated development of the Proposed Plan:

- **Rule 401 – Visible Emissions:** This rule states that a person shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or of such opacity as to obscure an observer's view.
- **Rule 402 – Nuisance:** This rule states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

²⁵ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, 2008, <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>. Accessed August 16, 2022.

²⁶ South Coast Air Quality Management District, *Final Methodology to Calculate Particulate Matter (PM)_{2.5} and PM_{2.5} Significance Thresholds*, 2006, [http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-\(pm\)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/particulate-matter-(pm)-2.5-significance-thresholds-and-calculation-methodology/final_pm2_5methodology.pdf?sfvrsn=2). Accessed August 16, 2022.

- **Rule 403 – Fugitive Dust:** This rule requires projects to prevent, reduce or mitigate fugitive dust emissions from a site. Rule 403 restricts visible fugitive dust to the project property line, restricts the net PM10 emissions to less than 50 micrograms per cubic meter (µg/m3) and restricts the tracking out of bulk materials onto public roads. Additionally, projects must utilize one or more of the best available control measures (identified in the tables within the rule). Mitigation measures may include adding freeboard to haul vehicles, covering loose material on haul vehicles, watering, using chemical stabilizers and/or ceasing all activities. Finally, a contingency plan may be required if so determined by the U.S. EPA.

Regulation XI – Source Specific Standards: Regulation XI sets emissions standards for specific sources. The following is a list of rules which may apply to reasonably anticipated activities of the Ordinance:

- **Rule 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations:** This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).
- **Rule 1148 - Thermally Enhanced Oil Recovery Wells:** This rule states that No person shall operate a steam drive well unless the ROG emissions from the well are 4.5 pounds per day or less; or if steam drive wells are connected to a vapor control system, ROG emissions from the control system shall average no more than 4.5 pounds per day per connected well.
- **Rule 1148.1 - Oil and Gas Extraction Wells:** This rule includes requirements for well operators that aim to reduce emissions of volatile organic compounds (VOCs), toxic air contaminants (TAC) emissions and Total Organic Compounds (TOC) from the operation and maintenance of wellheads, well cellars, and the handling of produced gas at oil and gas extraction facilities to assist in reducing regional ozone levels and to prevent public nuisance and possible detriment to public health caused by exposure to such emissions.
- **Rule 1148.2 - Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers:** This rule requires operators of an onshore oil or gas well shall electronically notify the Executive Officers prior to the start of drilling, well completion, or rework of an onshore oil or gas well.

Regulation XIV – Toxics and Other Non-Criteria Pollutants: Regulation XIV sets requirements for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants or other non-criteria pollutants. The following is a list of rules which may apply to reasonably anticipated activities of the Ordinance:

- **Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines:** This rule applies to stationary compression ignition (CI) engines greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Idle Well Regulations

In California, an idle well is a well that has not been used for two years or more and has not yet been properly plugged and abandoned (sealed and closed). An operator in possession of any idle well is required to either submit an annual idle well fee for each well that was idle at any time in the last calendar year or file an Idle Well Management Plan (IWMP) for the elimination of all of the operator's long-term idle wells. An operator must submit their annual idle well fees or IWMP by May 1 of each year. The requirements for both can be found in PRC Section 3206. If an operator does not have an IWMP, the annual idle well fees the operator must pay for each of the operator's idle wells have been increased to reflect the potential costs associated with those wells. The fees are deposited into the Hazardous and Idle-Deserted Well Abatement Fund to help fund the permanent sealing and closure of deserted wells.

Assembly Bill No. 2729

Inactive and deserted oil and gas wells that are not maintained can pose threats to groundwater and public safety. The bill expands the definition of "idle well" and encourages operators to file Idle Well Management Plans for either plugging and abandoning long-term idle wells or returning them to production. It also increases idle well fees to help encourage operators to address such wells in their inventories.

The Oil, Gas, and Geothermal Administrative Fund (OGGA)

In accordance with Public Resources Code Section 3401 (a) the proceeds of charges levied, assessed, and collected pursuant to Article 7 of the Public Resources Code (commencing with Section 3400), upon the properties of every person operating or owning any interest in the production of a well shall be used exclusively for the support and maintenance of the department charged with the supervision of oil and gas. The proceeds may also be used by public entities, subject to appropriation by the Legislature, for all costs associated with well stimulation treatments and costs of the State Water Resources Control Board and regional water quality control boards as provided in Public Resources Code section 3401 (b).

The Hazardous and Idle-Deserted Well Abatement Fund (HIDWAF)

Idle well fees are deposited into the Hazardous and Idle-Deserted Well Abatement Fund (HIDWAF) and are appropriated to CalGEM to plug and abandon wells to mitigate a hazardous or potentially hazardous condition.

State Abandonment Authority

The Public Resources Code (PRC) provides various presumptions and circumstances under which CalGEM may find that a well has been deserted. If CalGEM determines a well has been idle-deserted, then CalGEM may order the plugging and abandonment of the well. If an operator fails to rebut such presumptions and fails to commence the ordered work, then CalGEM may undertake the plugging and abandonment of the well. CalGEM's options for funding the plugging and abandonment differs depending upon the solvency of the operator.

Pipeline and Hazardous Materials Safety Administration's Office of Pipeline Safety (PHMSA)

PHMSA's mission is to protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives. To do this, the agency establishes national policy, sets and enforces standards, educates, and conducts research to prevent incidents. They also prepare the public and first responders to reduce consequences if an incident does occur.

Local

Office of Petroleum and Natural Gas Administration and Safety (OPNGAS)

Established in 2016, OPNGAS is charged with managing petroleum matters for the City and is headed by the Petroleum Administrator. The Petroleum Administrator manages the Office of Petroleum Administration; acts as a technical advisor to Mayor, Council, and City; performs internal & external interagency coordination; leads negotiations for pipeline franchise agreements; completes comprehensive inspections and safety compliance; is the central point of contact for oil and gas; verifies local, state and federal regulations; performs emergency and contingency planning and community and public engagement; and is an oil and gas media spokesperson

Los Angeles Municipal Code

Section. 13.01 of the Los Angeles Municipal Code (LAMC) establishes provisions for the districts where the drilling of oil wells or the extraction from the wells of oil, gases or other hydrocarbon substances is

permitted. All oil and gas projects require a conditional approval from the City of Los Angeles Department of City Planning and must be located within an oil drilling district.

Air Quality Element of the Los Angeles General Plan

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through their land use decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. In general, the City of Los Angeles' General Plan (including the Framework, Air Quality, Mobility 2035, and Health and Wellness Elements) and the City of Los Angeles' Green New Deal (Sustainable pLAn 2019) contain policies and programs for the protection of the environment and health through improved air quality. These serve to provide additional critical guidance for the betterment of public health for the region and City.

The most directly-related of those plans, the City's General Plan Air Quality Element, was adopted on November 24, 1992, and sets forth the goals, objectives, and policies which guide the City in its implementation of its air quality improvement programs and strategies. A number of these goals, objectives, and policies are relevant to land use development, and relate to traffic mobility, minimizing particulate emissions from construction activities, discouraging single-occupancy vehicle trips, managing traffic congestion during peak hours, and increasing energy efficiency in City facilities and private developments.

The Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution

The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Through capital improvement programs, the City can fund infrastructure that contributes to improved air quality by requiring such improvements as bus turnouts as appropriate, installation of energy-efficient streetlights, and synchronization of traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation measures.

Plan for a Healthy Los Angeles

The Plan for a Healthy Los Angeles, first adopted by the City Council on March 31, 2015, lays the foundation to create healthier communities for all residents in the City. The City Council subsequently adopted targeted amendments in the Plan For a Healthy Los Angeles on November 24, 2021. The updated Plan satisfies the State requirements (SB 1000) to address environmental justice in the General Plan. As the Health, Wellness, and Equity element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety and environmental justice, the Plan for a Healthy Los Angeles provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment (i.e., improved ambient and indoor air quality), the opportunity to thrive, and access to health services, affordable housing, and healthy and sustainably produced food. The Plan includes policies calling for the reduction of air pollution from stationary and mobile sources, and the protection of communities' health through land use and design solutions that limit exposure to noxious activities such as oil and gas extraction.

Safety Element of the Los Angeles General Plan

The updated Safety Element, adopted by the City Council on November 24, 2021, includes an objective and policies to address climate change, including air quality.

Table 6
City of Los Angeles Safety Element

Policy/Objective	
Objective 1.2	Confront the global climate emergency by setting measurable targets for carbon reduction that are consistent with the best available methods and data, center equity and environmental justice, secure fossil free jobs, and foster broader environmental sustainability and resiliency.
Policy 1.2.1	Environmental Justice. In keeping with the Plan for a Healthy LA, build a fair, just and prosperous city where everyone experiences the benefits of a sustainable future by correcting the long running disproportionate impact of environmental burdens faced by low income families and communities of color.
Policy 1.2.2	Renewable Energy. Aggressively pursue renewable energy sources, transitioning away from fossil based sources of energy and toward 100% renewable energy sources.
Policy 1.2.6	Mobility. In keeping with the Mobility Plan, build a comprehensive and integrated transportation network that changes how Angelenos get around and reduces car dependency.
Policy 1.2.7	Zero Emissions Vehicles. In keeping with the Mobility Plan, work toward zero emissions transportation and goods movement and increases zero emissions infrastructure including charging.
Policy 1.2.8	Industrial Emissions and Air Quality Monitoring. In keeping with the Air Quality Element, ensure that every Angeleno can breathe clean, healthy air by addressing air pollution from all sources, with a particular emphasis on prioritizing the health and wellbeing of overburdened families and delivering environmental justice.
Policy 1.2.11	Urban Ecosystem and Resilience. In keeping with the Conservation and Open Space Elements, create a more temperate biodiverse city with more green space for people and habitat.
Policy 1.2.13	Lead by Example. Leverage government owned properties and publicly-driven investments to realize broader climate change goals.

Source: City of Los Angeles, Safety Element, 2021.

Los Angeles Green Plan

The City seeks to address the issue of global climate change with the *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

The LA Green Plan is discussed in greater detail in **Section 4.7, Greenhouse Gas Emissions**.

City of Los Angeles Clean Up Green Up Ordinance

The City of Los Angeles adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings.²⁷ This Ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns. Section 99.04.504.6, which became effective June 4, 2016, mandates that regularly occupied areas in mechanically ventilated buildings within 1,000 feet of a freeway be provided with air filtration media for outside and return air that meet a Minimum Efficiency Report Value (MERV) of 13. This Ordinance requires that these filters be installed prior to occupancy, and recommendations for maintenance with filters of the same value shall be included in the operation and maintenance manual. The only exception to Section 99.04.504.3 applies to existing mechanical equipment. Additionally, Section 99.05.504.3 states that regularly occupied areas in all mechanically ventilated buildings shall be provided with air filtration media for outside and return air that meets a MERV of 8. An exception is provided for existing mechanical equipment and for new ventilation units meeting certain 2013 California Energy Code requirements. These additions to the LAMC are designed to address cumulative health impacts in highly polluted areas resulting from incompatible land use patterns within the City of Los Angeles.

2.5 THRESHOLDS AND METHODOLOGY

Thresholds of Significance

The impact analysis provided below is based on Appendix G to the *State CEQA Guidelines*, which indicates that a project would have a significant impact on air quality if it would:

1. Conflict with or obstruct implementation of any applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

The significance criteria established by the applicable air quality management or air pollution control district (SCAQMD) may be relied upon to make the above determinations. According to the SCAQMD, an

²⁷ City of Los Angeles Department of City Planning, Ordinance Number 184,245 Clean Up Green Up, Council File No. 15-1026, adopted April 13, 2016.

air quality impact is considered significant if a project would violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations. The SCAQMD has established thresholds of significance for air quality for construction and operational activities of land use development projects, shown in **Table 7 – South Coast AQMD Regional Significance Thresholds**.

Table 7
South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^d		
NO ₂ 1-hour average annual arithmetic mean	South coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM10 24-hour average annual average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM2.5 24-hour average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation)	
SO ₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal - 99th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	

^a Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)

^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

^c For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

^d Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.

^e Ambient air quality threshold based on South Coast AQMD Rule 403.

Localized Significance Thresholds

The SCAQMD has developed a set of mass emissions rate look-up tables that can be used to evaluate localized impacts that may result from construction and operational-period emissions called localized significance thresholds (LSTs). If the on-site emissions from proposed construction activities are below the emission levels found in the LST mass rate look-up tables for the project site receptor area (SRA), then emissions would not have the potential to cause a significant localized air quality impact. When quantifying mass emissions for LST analysis, only emissions that occur on site are considered. Consistent with SCAQMD LST guidance, emissions from offsite delivery hauling trucks, or employee trips are not considered in the evaluation of localized impacts (SCAQMD 2008).

The proposed Ordinance is citywide and thus multiple SRAs and LSTs would be applicable. Therefore, **Table 8, Local Significance Thresholds By SRA – Pounds per Day** shows the LST screening thresholds for all SRAs within the City.

Table 8
Local Significance Thresholds By SRA – Pounds per Day

SRA & Phase	Nitrogen Oxide (NO_x)	Carbon Monoxide (CO)	Coarse Particulate Matter (PM10)	Fine Particulate Matter (PM2.5)
SRA 1				
Construction	74	680	5	3
Operation	74	680	2	1
SRA 2				
Construction	103	562	4	3
Operation	103	562	1	1
SRA 3				
Construction	91	664	5	3
Operation	91	664	1	1
SRA 4				
Construction	57	585	4	3
Operation	57	585	1	1
SRA 6				
Construction	103	426	4	3
Operation	103	426	1	1
SRA 7				
Construction	80	498	4	3
Operation	80	498	1	1
SRA 8				
Construction	69	535	4	3
Operation	69	535	1	1
SRA 12				
Construction	46	231	4	3
Operation	46	2312	1	1

Source:

SCAQMD. 2009. *Appendix C Mass Rate Look Up Table*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2>.

Note: All LSTs presented are for a 1-acre site with receptors located at a distance of 25 meters. These LSTs are the most restrictive for each SRA, resulting in a conservative analysis of project impacts.

Methodology

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated previously, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. As such, for purposes of this analysis, there are two distinct phases that would have the potential to change air quality emissions at locations in proximity to oil and gas wells

throughout the City: 1) Short-term and temporary abandonment related activities, and 2) Long-term changes to air quality attributable to the cessation of oil and gas extraction and operations.

Air quality impacts were evaluated in accordance with the methodologies recommended by CARB and the SCAQMD. Air Quality emissions associated with short-term and temporary abandonment related activities were calculated using CalEEMod. Because these emissions would be short-term and temporary, they have been compared to SCAQMD's regional and localized significance thresholds. Long-term changes to air quality attributable to the cessation of oil and gas extraction and operations have been characterized quantitatively and qualitatively, and have been compared to SCAQMD's thresholds of significance as appropriate.

2.6 PROJECT IMPACTS

AQ Impact 1 Would implementation of the project conflict with or obstruct implementation of any applicable air quality plan? (*Less than Significant*).

As part of its enforcement responsibilities, the EPA requires each state with nonattainment areas to prepare and submit a SIP that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the CCAA requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

As discussed previously, the 2016 AQMP was drafted by the SCAQMD and was developed in effort with CARB, SCAG, and the U.S. EPA to establish a program of rules and regulations to reduce air pollutant emissions to achieve CAAQS and NAAQS.²⁸ The plan's pollutant control strategies are based on SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). While SCAG adopted the updated 2020-2045 RTP/SCS in September 2020, it has not been incorporated into an applicable air quality plan.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's 1993 CEQA Air Quality Handbook, and include the following:

²⁸ South Coast Air Quality Management District. 2016. *Air Quality Management Plan*. Available online at: <http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf>, accessed August 16, 2022.

- Consistency Criterion No. 1: The project will not result in an increase in the frequency or severity of an existing air quality violation, or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.
- Consistency Criterion No. 2: The project will not exceed the assumptions in the AQMP or increments based on the years of the project build-out phase.

The violations to which Consistency Criterion No. 1 refers are the CAAQS and the NAAQS. As evaluated under **AQ Impact 2** below, the Ordinance would not exceed the short-term standards or long-term standards and, thus, would not have the potential to violate any air quality standards. Thus, the Ordinance would be consistent with first criterion.

With respect to Consistency Criterion No. 2, the 2016 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts, and SCAG's growth forecasts were defined in consultation with local governments and with reference to local general plans. The Ordinance would not result in any changes to housing or population forecasts for the City or the region as a whole. Therefore, the Ordinance would not exceed the assumptions utilized to develop the 2016 AQMP and the Ordinance would be consistent with the second criterion. As such, because the Ordinance would be consistent with the criteria for demonstrating consistency with the AQMP, the Ordinance would not have the potential to conflict with or obstruct implementation of any applicable air quality plan and this impact is *less than significant*.

AQ Impact 2 **Would implementation of the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard? (*Less than Significant*).**

A project may have a significant impact if project-related emissions would result in a cumulatively considerable net increase for an criteria pollutant for which the region is nonattainment under applicable federal or state ambient air quality standards. The cumulative analysis of air quality impacts follows the SCAQMD's guidance such that construction or operational project emissions will be considered cumulatively considerable if project-specific emissions exceed an applicable SCAQMD recommended threshold.

Short-Term and Temporary Air Quality Emissions

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and

the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.²⁹ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. See **Section 1.2, Project Description**, for the anticipated steps of well abandonment.

For purposes of estimating potential air quality associated with abandonment activities, it is assumed each well abandonment would last approximately two weeks (i.e., 10 workdays), and on-site equipment would include one workover rig, one cement pump truck, one welder, and one tractor/loader/backhoe. On-road activity was estimated to include 10 worker trips per day (travel to and from the well locations) and 3 truck trips per day. This analysis conservatively assumes that all pieces of equipment would operate concurrently on a peak day, presenting a worst-case impact scenario.

Abandonment activities would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern include ozone-precursor pollutants (i.e., ROG and NO_x), PM₁₀, and PM_{2.5}. Abandonment-generated emissions are short term and of temporary duration, lasting only as long as activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the SCAQMD's thresholds of significance. Abandonment activities would be required to comply with all applicable SCAQMD Rules, which may include but not be limited to: Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust – Trucks and Unpaved Roads), Rule 1186 (PM₁₀ Emissions from Paved and Unpaved Roads), Rule 1148 (Thermally Enhanced Oil Recovery Wells), Rule 1148.1 (Oil and Gas Extraction Wells), Rule 1148.2 (Notification and Reporting Requirements for Oil and Gas Wells and Chemical Suppliers), and Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines). These Rules are discussed in greater detail in **Section 2.4, Regulatory Framework**, above. The estimated maximum daily abandonment related air

²⁹ When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

quality emissions are summarized in **Table 9, Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day**.

Table 9
Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day

Source	ROG	NOx	CO	SO2	PM10	PM2.5
Off-Road Equipment	0.51	4.69	5.79	0.01	0.19	0.17
Worker Trips	0.09	0.10	1.51	0.00	0.02	0.00
Truck Trips	0.01	0.31	0.14	0.01	0.02	0.01
Total Emissions	0.61	5.10	7.44	0.02	0.23	0.18
Regional Threshold	75	100	550	150	150	55
Exceed?	No	No	No	No	No	No

Source: Impact Sciences, September 2022. See Appendix B to this report.

As shown in **Table 8**, on a per-well basis, the peak daily emissions generated during abandonment would not exceed any of the regional emission thresholds recommended by the SCAQMD. As discussed previously, abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe. It would be speculative to assess how many wells would be abandoned during a given year, month, or peak day. Nevertheless, for illustrative purposes, based on the peak daily emissions identified in **Table 8** for a single well, it is possible for up to approximately 19 wells to be abandoned concurrently (i.e., overlapping on a peak day) without exceeding any of the regional emission thresholds recommended by the SCAQMD. Therefore, the Ordinance would not result in a cumulatively considerable net increase of any criteria air pollutant for which the region is in nonattainment and this impact is *less than significant*.

Long-Term Air Quality Emissions

As discussed previously, oil and gas operations throughout the City contribute to local and regional air quality conditions. Upon full implementation of the Ordinance, existing emission sources associated with oil and gas wells would no longer occur, and long-term air quality emissions would be decreased compared to existing emissions associated with oil and gas extraction throughout the City. The following discussion identifies the potential air quality emissions that may be avoided as a result of the Ordinance.

Long-term air quality emissions fall into two general categories: 1) worker commutes and 2) fugitive emissions. Typical emissions from worker commutes (i.e., motor vehicle trips) include ROG, NOx, CO, SOx, PM10 and PM2.5. Fugitive emissions include ROG (also referred to as volatile organic compounds)

which may include but not be limited to pentane, n-pentane, hexane, ethane, and other longer-chain hydrocarbons. In general, fugitive emissions from oil and gas activities may be attributed to the following primary types of sources: fugitive equipment leaks; process venting; evaporation losses; disposal of waste gas streams (e.g., by venting or flaring), and accidents and equipment failures. Fugitive leaks from piping and equipment are typically small yet detectable emissions from equipment where there are joints, flanges, and seals. Although joints and flanges are typically bolted, small amounts of hydrocarbons may be emitted through leaky joints.

It should be noted that fugitive emissions are difficult to quantify with a high degree of accuracy and there remains substantial uncertainty in the emission factors and calculation methodologies for oil and gas activities. This is due to the numerous types of sources and many variables to be considered. The key emission assessment issues are: (a) use of simple extraction based emission factors is susceptible to excessive errors; (b) use of rigorous bottom-up approaches requires expert knowledge to apply and relies on detailed data which may be difficult and costly to obtain; and (c) measurement programs are time consuming and very costly to perform.³⁰ Nevertheless, **Table 10, Avoided Oil & Gas Air Quality Emissions – Pounds per Day**, has been included in an effort to illustrate the potential scope of air quality emissions that may be avoided as a result of the Ordinance.³¹ Due to the programmatic nature of this analysis and the many variables at each oil and gas well throughout the City, the quantified estimates in **Table 9** are included as a good-faith effort for illustrative purposes.

Table 10
Avoided Oil & Gas Air Quality Emissions – Pounds per Day

Source	ROG	NOx	CO	SO2	PM10	PM2.5
Worker Emissions	1.12	1.11	16.60	0.06	2.71	0.50
Fugitive Emissions	807.66	--	--	--	--	--
Total Avoided Emissions	808.78	1.11	16.60	0.06	2.71	0.50

Source: Impact Sciences, September 2022. See **Appendix B** to this report.

Furthermore, while it is clear the Ordinance would result in a net benefit to local and regional air quality conditions, the degree to which air quality emissions may be avoided under the Ordinance is not the basis for the impact determination. Because the Ordinance would reduce long-term air quality emissions

³⁰ Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

³¹ See **Appendix B** to this report for further information related to calculations and assumptions utilized to prepare these estimates.

compared to existing emissions associated with oil and gas extraction throughout the City, the Ordinance would not result in a cumulatively considerable net increase of any criteria air pollutant for which the region is in nonattainment and this impact is *less than significant*.

AQ Impact 3 **Would implementation of the project expose sensitive receptors to substantial air pollutant concentrations? (*Less than Significant*).**

Localized Air Quality Emissions

The SCAQMD has developed localized significance thresholds (LST) that represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the applicable federal or State ambient air quality standard. LSTs are provided for each source receptor area (SRA) and various distances from the source of emissions. As the Ordinance is citywide, activities under the Ordinance could occur in parts of eight SRAs in the Coastal, Metropolitan, San Fernando Valley, and San Gabriel Valley areas.³² The LSTs applicable to the Ordinance were presented previously in **Table 7**. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. Abandonment activities would generate short-term localized emissions of criteria air pollutants. While abandonment-generated emissions are short term and of temporary duration, the emissions could be considered a significant air quality impact if the pollutants exceed the SCAQMD's LSTs.

As shown in **Table 11, Localized Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day**, the Ordinance would not exceed any of the identified localized thresholds of significance during abandonment. Therefore, the Ordinance would not expose sensitive receptors to substantial air pollutant concentrations and these impacts would be *less than significant*.

³² The SRAs include: SRA 1, described as Central Los Angeles County; SRA 2, described as Northwest Los Angeles County Coastal; SRA 3, described as Southwest Los Angeles County Coastal; SRA 4, described as South Los Angeles County Coastal; SRA 6, described as West San Fernando Valley; SRA 7, described as East San Fernando Valley; SRA 8, described as West San Gabriel Valley; and SRA 12, described as South Central Los Angeles County.

Table 11
Localized Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day

Activity	NOx	CO	PM10	PM2.5
Abandonment	4.69	5.79	0.19	0.17
<i>SCAQMD Localized Thresholds</i>	<i>46.00</i>	<i>231.00</i>	<i>4.00</i>	<i>3.00</i>
Exceed Thresholds?	No	No	No	No

Note: Based on the data in Table 7, the lowest (i.e., most restrictive) LST for each pollutant in any SRA citywide has been identified to present a conservative analysis.

Source: Impact Sciences, September 2022. See Appendix B to this report.

Diesel Particulate Matter

The use of diesel-powered equipment and trucks during abandonment would result in the generation of diesel particulate matter (diesel PM) emissions. The amount to which the sensitive receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment and trucks would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current methodologies for conducting health risk assessments are associated with long term exposure periods (9, 30, and 70 years). As discussed previously, typical abandonment activities are expected to last for approximately 10 work days. Therefore, short-term abandonment activities would not have the potential to generate a significant health risk. Furthermore, abandonment activities would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than 5-minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.³³ For these reasons, DPM emissions associated with abandonment would not expose sensitive receptors to substantial amounts of air toxics and this impact is *less than significant*.

³³ California Air Resources Board. 2015. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel-Fueled (Off-Road Regulation)*. Available online at: <https://www3.arb.ca.gov/msprog/ordiesel/faq/idlepolicyfaq.pdf>, accessed August 16, 2022

AQ Impact 4 Would the proposed project include sources that could create other emissions (such as those leading to odors) adversely affecting a substantial number of people? (*Less than Significant*).

The SCAQMD *CEQA Air Quality Handbook* (1993) identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding.

Existing oil and gas operations throughout the City contribute to localized emissions that lead to odors. Several compounds associated with the oil and gas industry can produce nuisance odors. Sulfur compounds found in oil and gas have very low odor detection levels. Many volatile compounds found in oil and gas (e.g., pentane, n-pentane, hexane, ethane, and other longer-chain hydrocarbons) typically have a petroleum or gasoline-type odor. An odor “event” is generally considered a scenario where odors are released and negatively impact the surrounding community, measured as generating odor complaints to the SCAQMD and confirmed by the SCAQMD as attributable to a specific source.

During abandonment activities, the two primary sources of potential odors are fugitive well emissions and diesel exhaust from equipment and trucks. As abandonment activities are anticipated to last approximately 10 work days, these emission sources and associated odors would be temporary and intermittent, and affecting only those receptors located in proximity to the wells. In addition, abandonment activities would be subject to SCAQMD Rule 402 (Nuisance) and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. These regulations would serve to minimize temporary and intermittent odors. As oil and gas operations cease, existing oil and gas well emissions leading to odors would no longer occur, and long-term odors would be decreased compared to existing conditions. Therefore, the Ordinance would not create other emissions leading to odors adversely affecting a substantial number of people, and this impact is *less than significant*.

3.0 GREENHOUSE GAS

3.1 GREENHOUSE GAS SETTING

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind, lasting for an extended period (i.e., decades or longer).³⁴ Climate change may result from:

- Natural factors, such as changes in the sun's intensity or slow changes in the Earth's orbit around the sun;
- Natural processes within the climate system (e.g., changes in ocean circulation, reduction in sunlight from the addition of GHG and other gases to the atmosphere from volcanic eruptions); and
- Human activities that change the atmosphere's composition (e.g., through burning fossil fuels) and the land surface (e.g., deforestation, reforestation, urbanization, desertification).

In recent decades, changes in climate have caused impacts on natural and human systems on all continents and across the oceans. Impacts are due to observed climate change, irrespective of its cause, indicating the sensitivity of natural and human systems to changing climate.³⁵ Continuing changes to the global climate system and ecosystems, and to California, are projected to include:

- Rapidly diminishing sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in tropospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures³⁶;
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and ice sheets;
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;

34 US EPA. Overview of Greenhouse Gases. Available online at: <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>, accessed on August 16, 2022.

35 Intergovernmental Panel on Climate Change. 2013. "Climate Change 2013: The Physical Science Basis." Available online at: <https://www.ipcc.ch/report/ar5/wg1/>, accessed August 16, 2022.

36 Intergovernmental Panel on Climate Change. 2013. "Climate Change 2013: The Physical Science Basis." Available online at: <https://www.ipcc.ch/report/ar5/wg1/>, accessed August 16, 2022.

- Changing levels in snowpack, river flow and sea levels indicating that climate change is already affecting California's water resources³⁷;
- Dry seasons that start earlier and end later, evoking more frequent and intense wildland fires³⁸; and
- Increasing demand for electricity due to rising temperatures.³⁹

The natural process through which heat is retained in the troposphere⁴⁰ is called the "greenhouse effect." Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases, play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere as short wave radiation. It travels through the atmosphere without warming it and is absorbed by the Earth's surface. When the Earth re-emits this radiation back toward space, the radiation changes to long wave radiation. GHGs are transparent to incoming short wave solar radiation but absorb outgoing long wave radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

Greenhouse Gas Compounds

California State law defines GHGs to include the following six compounds:

- **Carbon Dioxide** (CO₂) is an odorless, colorless GHG, which has both natural and man-made sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing; man made sources of CO₂ are burning coal, oil, natural gas, and wood.
- **Methane** (CH₄) is a flammable gas and is the main component of natural gas. When one molecule of CH₄ is burned in the presence of oxygen, one molecule of CO₂ and two molecules of water are released. There are no ill health effects from CH₄. A natural source of CH₄ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH₄, which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.

³⁷ California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

³⁸ California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

³⁹ California Environmental Protection Agency (Cal EPA). 2010. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

⁴⁰ The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface from 6- to 7-miles).

- **Nitrous Oxide** (N_2O) is a colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N_2O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
- **Hydrofluorocarbons** (HFCs) are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987.
- **Perfluorocarbons** (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.

Sulfur Hexafluoride (SF_6) is an inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF_6 is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

- **Black Carbon** is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass. It contributes to global warming, but is a solid particle or aerosol, not a gas.

Global Warming Potential

Global Warming Potential (GWP) is one type of simplified index based upon radiative properties that is used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO_2 , as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO_2 . A summary of the atmospheric lifetime and GWP of selected gases is presented in **Table 12, Atmospheric Lifetimes and Global Warming Potential for Greenhouse Gases**.

Table 12
Atmospheric Lifetimes and Global Warming Potential for Greenhouse Gases

Greenhouse Gas	Lifetime (Years)	Global Warming Potential Factor (20-Year)	Global Warming Potential Factor (100-Year)
Carbon Dioxide	100	1	1
Nitrous Oxide	121	264	298
Nitrogen Trifluoride	500	12,800	16,100
Sulfur Hexafluoride	3,200	17,500	23,500
Perfluorocarbons	3,000-50,000	5,000-8,000	7,000-11,000
Black Carbon	days to weeks	270-6,200	100-1,700
Methane	12	84	25
Hydrofluorocarbons	Uncertain	100-11,000	100-12,000

Source: CARB, *Climate Change Scoping Plan First Update*, 2013.

Note: "Global Warming Potential" is a relative measure of how much heat a GHG traps in the atmosphere, as compared to CO₂.

Potential Effects of Climate Change

Globally, climate change has the potential to affect numerous environmental resources though potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Long-term trends have found that each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature for the decade from 2006 to 2015 was approximately 0.87 °C (0.75°C to 0.99°C) higher than the average over the period from 1850 to 1900. Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature obtained from station observations are in agreement that air and sea surface temperatures have increased. Due to past and current activities, anthropogenic GHG emissions are increasing global mean surface temperature at a rate of 0.2°C per decade. In addition to these findings, there are identifiable signs that global warming is currently taking place, including substantial ice loss in the Arctic over the past two decades.^{41,42}

According to California's Fourth Climate Change Assessment, statewide temperatures from 1986 to 2016 were approximately 1°F to 2°F higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include loss in water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years. While there is growing scientific consensus

⁴¹ IPCC, *5th Assessment Report*, 2014.

⁴² IPCC, *Special Report on the Impacts of Global Warming*, 2018.

about the possible effects of climate change at a global and statewide level, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. In addition to statewide projections, California's Fourth Climate Change Assessment includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the state as well as regionally-specific climate change case studies.⁴³ Below is a summary of some of the potential effects that could be experienced in California as a result of climate change.

Air Quality. Higher temperatures, which are conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore its indirect effects, are uncertain. As temperatures have increased in recent years, the areas burned by wildfires throughout the state has increased, and wildfires have been occurring at higher elevations in the Sierra Nevada Mountains.⁴⁴ If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality would worsen. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thereby ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state.⁴⁵

Water Supply. Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. For example, many southern California cities have experienced their lowest recorded annual precipitation twice within the past decade; however, in a span of only two years, Los Angeles experienced both its driest and wettest years on record.⁴⁶ This uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. However, the average early spring snowpack in the western United States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 5.9 inches along the central and southern California coast.⁴⁷ The Sierra snowpack provides the majority of California's water supply by accumulating

⁴³ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁴⁴ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁴⁵ California Natural Resources Agency, *California Climate Adaptation Strategy*, 2009.

⁴⁶ California Department of Water Resources, *Managing an Uncertain Future: Climate Change Adaptation Strategies for California's Water*, 2008.

⁴⁷ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

snow during the state's wet winters and releasing it slowly during the state's dry springs and summers. A warmer climate is predicted to reduce the fraction of precipitation falling as snow and result in less snowfall at lower elevations, thereby reducing the total snowpack.^{48,49} The State of California projects that average spring snowpack in the Sierra Nevada and other mountain catchments in central and northern California will decline by approximately 66 percent from its historical average by 2050.⁵⁰

Hydrology and Sea Level Rise. As discussed above, climate change could potentially affect the amount of snowfall, rainfall, and snowpack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for saltwater intrusion. Climate change has the potential to induce substantial sea level rise in the coming century.⁵¹ The rising sea level increases the likelihood and risk of flooding. The rate of increase of global mean sea levels over the 2001-2010 decade, as observed by satellites, ocean buoys and land gauges, was approximately 3.2 millimeter per year, which is double the observed 20th century trend of 1.6 millimeter per year.⁵² As a result, global mean sea levels averaged over the last decade were about 8 inches higher than those of 1880.⁵³

Sea levels are rising faster now than in the previous two millennia, and the rise is expected to accelerate, even with robust GHG emission control measures. The most recent Intergovernmental Report on Climate Change (IPCC) report predicts a mean sea-level rise of 10 to 37 inches by 2100.⁵⁴ A rise in sea levels could completely erode 31 to 67 percent of southern California beaches, result in flooding of approximately 370 miles of coastal highways during 100-year storm events, jeopardize California's water supply due to salt water intrusion, and induce groundwater flooding and/or exposure of buried infrastructure.⁵⁵ In addition, increased CO₂ emissions can cause oceans to acidify due to the carbonic acid it forms. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

⁴⁸ California Department of Water Resources, *Managing an Uncertain Future: Climate Change Adaption Strategies for California's Water*, 2008.

⁴⁹ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁵⁰ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁵¹ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁵² World Meteorological Organization, *A Summary of Current and Climate Change Findings and Figures: A WMO Information Note*, 2013.

⁵³ World Meteorological Organization, *A Summary of Current and Climate Change Findings and Figures: A WMO Information Note*, 2013.

⁵⁴ IPCC, *Special Report on the Impacts of Global Warming*, 2018.

⁵⁵ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

Agriculture. California has a \$50 billion annual agricultural industry that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts.⁵⁶ Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent; water demand could increase as hotter conditions lead to the loss of soil moisture; crop-yield could be threatened by water-induced stress and extreme heat waves; and plants may be susceptible to new and changing pest and disease outbreaks.⁵⁷ In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thereby affect their quality.⁵⁸

Ecosystems and Wildlife. Climate change and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists project that the annual average maximum daily temperatures in California could rise by 4.4 to 5.8°F in the next 50 years and by 5.6 to 8.8°F in the next century.⁵⁹ Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals related to (1) timing of ecological events; (2) geographic distribution and range; (3) species' composition and the incidence of nonnative species within communities; and (4) ecosystem processes, such as carbon cycling and storage.^{60,61}

Statewide GHG Emissions

CalEPA published a report titled *Scenarios of Climate Change in California: An Overview* (Climate Scenarios report) in February 2006 that, while not adequate for a CEQA project-specific or cumulative analysis, is generally instructive about the future impacts of global warming on California. In addition, on December 2, 2009, the California Natural Resources Agency released its *California Climate Adaptation Strategy* report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. According to these reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California. This includes an associated projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. Under the emissions scenarios of the Climate Scenarios report, the impacts of global climate change in California have the potential to include,

⁵⁶ California Department of Food and Agriculture, *California Agricultural Production Statistics*, 2018.

⁵⁷ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁵⁸ California Climate Change Center, *Climate Scenarios for California*, 2006.

⁵⁹ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

⁶⁰ Parmesan, C. August, *Ecological and Evolutionary Responses to Recent Climate Change*, 2006.

⁶¹ State of California, *California's Fourth Climate Change Assessment Statewide Summary Report*, 2018.

but are not limited to, the areas of public health, water resources, agriculture, forests and landscapes, and rising sea levels. The potential effects of climate change are detailed in the section below.

CARB publishes an annual statewide emissions inventory trends report with the most recent iteration covering the years 2000–2019. Emission inventory trends over the past decade demonstrate that GHG emissions have decreased by eight percent over that period, as shown in **Table 13**.⁶² The units of GHG emissions presented in the table are in million metric tons of carbon dioxide equivalents (MMTCO₂e). The transportation sector represents California’s largest source of GHG emissions and contributed approximately 40 percent of total annual emissions in 2019.

Table 13
California Greenhouse Gas Emissions Inventory

Sector	CO ₂ e Emissions (Million Metric Tons)										
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Transportation	168.0	165.1	161.8	161.4	161.3	162.6	166.2	169.8	171.2	169.6	166.1
Industrial	87.2	91.1	89.4	88.9	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Electric Power	101.3	90.3	89.2	98.2	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Commercial and Residential	44.5	45.9	46.0	43.5	44.2	38.2	38.8	40.6	41.3	41.4	43.8
Agriculture	32.9	33.7	34.4	35.5	33.8	34.7	33.5	33.3	32.5	32.7	31.8
High GWP Sources	12.3	13.5	14.5	15.5	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Recycling and Waste	8.2	8.3	8.4	8.3	8.4	8.4	8.5	8.6	8.7	8.7	8.9
Emissions Total	454.4	447.9	443.7	451.3	447.6	443.	440.7	429.1	424.6	425.1	418.2

Source: CARB, *California Greenhouse Gas Emission Inventory - 2021 Edition*, July 2021. Available at: <https://ww3.arb.ca.gov/cc/inventory/data/data.htm>. Accessed August 2022.

The data in **Table 14** convey a steady increase in GHG emissions from the transportation sector between 2013 and 2017, followed by sequential years of reductions in 2018 and 2019. This recent decline is consistent with the long-term direction of transportation-related GHG emissions resulting from statewide reduction initiatives, as evidenced by 2019 transportation emissions being lower than 2009 levels despite the growing population. Transportation sector GHG emissions have declined as a material benefit of more stringent fuel economy standards and enhanced alternative fuel vehicle programs mandated and enforced by the CARB.

⁶² CARB, *California Greenhouse Gas Emission Inventory - 2021 Edition*, July 2021. Available at: <https://ww3.arb.ca.gov/cc/inventory/data/data.htm>, accessed August 16, 2022.

Local GHG Emissions

As part of the Sustainable City pLAN, the City began tracking its GHG emissions inventory and progress in control strategies to reduce emissions in annual reports. L.A.'s Green New Deal is an expanded vision of the Sustainable City pLAN. Consistent with state-level regulatory initiatives to reduce GHG emissions, the City selected the 1990 GHG emissions level of 54.1 MMTCO₂e as the comparative baseline for determining the efficacy of emission control strategies. According to L.A.'s Green New Deal third Annual Report (2021–2022), the City has reduced GHG emissions to 36 percent below 1990 levels as of 2020.⁶³ Coal generation decreased 25% from 2019 to 2020. The City is striving to be coal-free by 2025. Between 2014 and 2020, the carbon intensity of L.A.'s electricity grid has decreased by 46 percent, and 59 percent compared to a 1990 baseline. Los Angeles utilizes 43 percent renewable energy, and has the goal of reaching 60 percent renewables by 2030 and to be carbon free by 2045.⁶⁴ The Sustainable City pLAN is described in more detail above under Regulatory Framework.

3.2 REGULATORY FRAMEWORK

International

Intergovernmental Panel on Climate Change. The World Meteorological Organization (WMO) and United Nations Environmental Program (UNEP) established the IPCC in 1988. The goal of the IPCC is to evaluate the risk of climate change caused by human activities. Rather than performing research or monitoring climate, the IPCC relies on peer-reviewed and published scientific literature to make its assessment. While not a regulatory body, the IPCC assesses information (i.e., scientific literature) regarding human-induced climate change and the impacts of human-induced climate change and recommends options to policy makers for the adaptation and mitigation of climate change. The IPCC reports its evaluations in special reports called assessment reports. The latest assessment report (i.e., Fifth Assessment Report, consisting of three working group reports and a synthesis report based on the first three reports) was published in 2013. In its 2013 report, the IPCC stated that global temperature increases since 1951 were extremely likely attributable to man-made activities (greater than 95 percent certainty).⁶⁵ The IPCC anticipates the release of the Sixth Assessment Report in 2022.⁶⁶

⁶³ City of Los Angeles, *L.A.'s Green New Deal. Annual Report 2021-2022*, 2022.

⁶⁴ City of Los Angeles, *L.A.'s Green New Deal. Annual Report 2021-2022*, 2022.

⁶⁵ IPCC, *Climate Change 2013 The Physical Science Basis*, 2013.

⁶⁶ IPCC, *AR6 Synthesis Report: Climate Change 2022*. Available online at: <https://www.ipcc.ch/report/sixth-assessment-report-cycle/>, accessed August 16, 2022.

U.S.–China Climate Agreement. In November 2014, the United States and China made a joint announcement to cooperate on combating climate change and promoting clean energy. In the United States, President Barack Obama announced a climate target to reduce GHG emissions by 26 to 28 percent below 2005 levels by 2025. In China, President Xi Jinping announced a climate target to reduce peak CO₂ emissions by 2030 and to increase the renewable energy share across all sectors to 20 percent by 2030. China will need to build an additional 800 to 1,000 gigawatts of nuclear, wind, solar, and other zero emission generation capacity by 2030 to reach this target. Together, the United States and China have agreed to: expand joint clean energy research and development at the U.S.-China Clean Energy Research Center, advance major carbon capture, use and storage demonstrations, enhance cooperation on HFCs, launch a climate-smart/low-carbon cities initiative, promote trade in green goods, and demonstrate clean energy on the ground.⁶⁷

Paris United Nations Framework Convention on Climate Change (Paris Accord). A new international climate change agreement was adopted at the Paris United Nations Framework Convention on Climate Change conference in December 2015. The last two climate conferences in Warsaw (2013) and Lima (2014) decided that countries were to submit their proposed emissions reduction targets for the 2015 conference as “intended nationally determined contributions” prior to the Paris conference. The European Union has committed to an economy-wide, domestic GHG reduction target of 40 percent below 1990 levels by 2030. The United States has set its intended nationally determined contribution to reduce its GHG emissions by 26 to 28 percent below its 2005 level in 2025 and to make best efforts to reduce its emissions by 28 percent. These targets are set with the goal of limiting global temperature rise to well below 2 degrees Celsius and getting to the 80 percent emission reduction by 2050.

In June 2017, the U.S. announced its intent to withdraw from the Paris Accord with an effective date of withdrawal of November 2020. On Friday, February 19, 2021, the United States formally rejoined the Paris Agreement.

In an effort to reach the goals set by the Paris Accord, over 9,000 cities and local governments from 132 countries across the world formed the Global Covenant of Mayors (GCoM) with the goal of collectively reducing 1.3 billion tons of CO₂ emissions per year by 2030.⁶⁸ 158 cities within the United States joined the GCoM (prior to the US formally rejoining the Paris Accord), including the City of Los Angeles.⁶⁹

⁶⁷ The White House, *Fact Sheet: U.S.-China Joint Announcement on Climate Change and Clean Energy Cooperation*, November 11, 2014.

⁶⁸ Global Covenant of Mayors for Climate & Energy Change. *About Us*. Available online at: <https://www.globalcovenantofmayors.org/about/>, accessed August 16, 2022

⁶⁹ Global Covenant of Mayors for Climate & Energy. *USA*. Available online at: <https://www.globalcovenantofmayors.org/region/usa/>, accessed August 16, 2022

North American Climate, Clean Energy, and Environment Partnership Action Plan. The North American Climate, Clean Energy, and Environment Partnership Action Plan was announced by Prime Minister Justin Trudeau, President Barack Obama, and President Enrique Peña Nieto on June 29, 2016, at the North American Leaders Summit in Ottawa, Canada. This Action Plan identifies the deliverables to be achieved and activities to be pursued by the three countries as part of this enduring Partnership. The three leaders declared their common vision in a historic North American Climate, Clean Energy, and Environment Partnership, described in a Leaders' Statement and Action Plan that details the actions our leaders will pursue. These actions include:

- Setting a target to increase clean power to 50 percent of the electricity generated across North America by 2025;
- Reducing methane emissions from the oil and gas sector by 40 to 45 percent by 2025;
- Strengthening standards for energy efficiency and vehicle emissions, including aligning energy efficiency standards that will amount to over four billion per year in annual savings for United States businesses and consumers by 2025;
- Strengthening vehicle efficiency, improving fuel quality, and reducing tailpipe pollutants;
- Affirming their support for joining and implementing the Paris Agreement this year and committing to work together to address climate issues through the Montreal Protocol, International Civil Aviation Organization, G-20, and other forums; and
- Celebrating our strong environmental cooperation, including expanding cooperation on early warning systems for natural disasters, supporting habitat for migratory species including Monarchs and birds, and developing action plans to combat wildlife trafficking.

Federal

Federal Clean Air Act. The United States Environmental Protection Agency (U.S. EPA) is responsible for implementing federal policy to address GHGs. The United States Supreme Court (Supreme Court) ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO₂ and other GHGs are pollutants under the federal Clean Air Act (CAA), which the U.S. EPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, U.S. EPA issued an endangerment finding for GHGs under the Clean Air Act, setting the stage for future regulation.

The Federal Government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy,

methane and other non-CO₂ gases, agricultural practices, and implementation of technologies to achieve GHG reductions. U.S. EPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

Corporate Average Fuel Economy (CAFE) Standards. In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the U.S. EPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011 and later for model years 2012-2016, and 2017-2021. In March 2020, the USDOT and the U.S. EPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe carbon dioxide emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.⁷⁰ These standards set a combined fleet wide average of 36.9 to 37 for the model years affected.⁷¹

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the U.S. EPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the U.S. EPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the EPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons.⁷²

Energy Independence and Security Act. The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

⁷⁰ U.S. Environmental Protection Agency, *Final Rule for Model Year 2021 - 2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards*. April 30, 2020.

⁷¹ National Highway Traffic Safety Administration (NHTSA), *Corporate Average Fuel Economy standards*.

⁷² U.S. EPA, *EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond*, August 2016.

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the U.S. EPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”⁷³

Global Change Research Act (1990). In 1990, Congress passed—and the President signed—Public Law 101-606, the Global Change Research Act.⁷⁴ The purpose of the legislation was: “...to require the establishment of a United States Global Change Research Program aimed at understanding and responding to global change, including the cumulative effects of human activities and natural processes on the environment, to promote discussions towards international protocols in global change research, and for other purposes.” To that end, the Global Change Research Information Office was established in 1991 to serve as a clearinghouse of information. The Act requires a report to Congress every four years on the environmental, economic, health and safety consequences of climate change; however, the first and only one of these reports to date, the National Assessment on Climate Change, was not published until 2000. In February 2004, operational responsibility for GCRIO shifted to the U.S. Climate Change Science Program.

National Fuel Efficiency Policy. On May 19, 2009, the president announced a new National Fuel Efficiency Policy aimed at increasing fuel economy and reducing GHG pollution. This policy is expected to increase

⁷³ A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

⁷⁴ Global Change Research Act (Public Law 101-606, 104 Stat. 3096-3104). 1990. Available online at: <https://www.govinfo.gov/content/pkg/STATUTE-104/pdf/STATUTE-104-Pg3096.pdf>, accessed August 16, 2022.

fuel economy by more than five percent by requiring a fleet-wide average of 35.5 miles per gallon by 2016 starting with model year 2012.

Fuel Economy Standards. On September 15, 2009, the U.S. EPA and the NHTSA issued a joint proposal to establish a national program consisting of new standards for model year 2012 through 2016 light-duty vehicles that will reduce GHG emissions and improve fuel economy. The proposed standards were to be phased in and require passenger cars and light-duty trucks to comply with a declining emissions standard. In 2012, passenger cars and light-duty trucks were required to meet an average emissions standard of 295 grams of CO₂ per mile and 30.1 miles per gallon. By 2016, the vehicles were required to meet an average standard of 250 grams of CO₂ per mile and 35.5 miles per gallon. The final standards were adopted on April 1, 2010.

On December 7, 2009, the U.S. EPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA (42 United States Code Section 7521):

Endangerment Finding: The Administrator found that the current and projected concentrations of the six key well-mixed GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten the public health and welfare of current and future generations.

Cause or Contribute Finding: The Administrator found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare.

While these findings do not impose additional requirements on industry or other entities, this action is a prerequisite to finalizing the U.S. EPA's proposed GHG emissions standards for light-duty vehicles, which were jointly proposed by the U.S. EPA and the NHTSA. On April 1, 2010, the U.S. EPA and the NHTSA issued final rules requiring that by the 2016 model-year, manufacturers must achieve a combined average vehicle emission level of 250 grams CO₂ per mile, which is equivalent to 35.5 miles per gallon as measured by U.S. EPA standards.

On November 16, 2011, EPA and NHTSA issued a joint proposal to extend the national program of harmonized GHG and fuel economy standards to model year (MY) 2017 through 2025 passenger vehicles. In August 2012, President Obama finalized standards that will increase fuel economy to the equivalent of 54.5 mpg for cars and light-duty trucks by MY 2025.

On January 12, 2017, the U.S. EPA Administrator Gina McCarthy signed her determination to maintain the GHG emissions standards for model year MY 2022-2025 vehicles. Her final determination found that automakers are well positioned to meet the standards at lower costs than previously estimated.⁷⁵

On March 15, 2017, the new U.S. EPA Administrator Scott Pruitt and Department of Transportation Secretary Elaine Chao announced that the U.S. EPA intended to reconsider the final determination, issued on January 12, 2017, that recommended no change to the greenhouse gas standards for light duty vehicles for model years 2022- 2025.⁷⁶

On April 2, 2018, the Administrator signed the Mid-term Evaluation Final Determination which finds that the model year 2022-2025 greenhouse gas standards are not appropriate in light of the record before EPA and, therefore, should be revised.⁷⁷

On September 19, 2019, under the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and the U.S. EPA issued the final "One National Program Rule." The rule states that federal law preempts state and local laws regarding tailpipe GHG emissions standards, zero emissions vehicle mandates, and fuel economy for automobiles and light duty trucks. The rule revokes California's Clean Air Act waiver and preempts California's Advanced Clean Car Regulations and may potentially impact SCAG's Connect SoCal and transportation projects in the SCAG region.^{78,79}

On September 20, 2019, a lawsuit was filed by California and a coalition of 22 other states, and the cities of Los Angeles, New York and Washington, D.C., in the United States District Court for the District of Columbia (Case 1:19-cv-02826) challenging the SAFE Rule and arguing that EPA lacks the legal authority to withdraw the California waiver. In April 2021, the U.S. EPA announced it would reconsider its previous

⁷⁵ U.S. Environmental Protection Agency. *Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emissions Standards for Model Years 2022-2025*. Available online at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/midterm-evaluation-light-duty-vehicle-greenhouse-gas>, accessed August 16, 2022.

⁷⁶ U.S. Environmental Protection Agency. *Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emissions Standards for Model Years 2022-2025*. Available online at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/midterm-evaluation-light-duty-vehicle-greenhouse-gas>, accessed August 16, 2022.

⁷⁷ U.S. Environmental Protection Agency. *Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas Emissions Standards for Model Years 2022-2025*. Available online at: <https://www.epa.gov/regulations-emissions-vehicles-and-engines/midterm-evaluation-light-duty-vehicle-greenhouse-gas>, accessed August 16, 2022.

⁷⁸ U.S. Department of Transportation and U.S. EPA. 2019. *One National Program Rule on Federal Preemption of State Fuel Economy Standards*. Available online at: <https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockkey=P100XI4W.pdf>, accessed August 16, 2022.

⁷⁹ Southern California Association of Governments. 2019. *Final Federal Safer, Affordable, Fuel-Efficient Vehicles Rule Part I (Supplemental Report)*. Available online at: https://scag.ca.gov/sites/main/files/file-attachments/eec_item8_rc_item10_supplemental_report.pdf?1604641275, accessed August 16, 2022.

withdrawal and grant California permission to set more stringent climate requirements for cars and SUVs. On March 9, 2022, the U.S. EPA restored California's 2013 waiver to full force, including both its GHG standards and zero-emissions vehicles sales requirements.

Executive Order 13693. Issued on June 10, 2015, Executive Order 13693 — Planning for Federal Sustainability in the Next Decade. The goal of Executive Order 13693 is to maintain federal leadership in sustainability and GHG emission reductions. This Executive Order outlines forward-looking goals for federal agencies in the area of energy, climate change, water use, vehicle fleets, construction, and acquisition. Federal agencies shall, where life-cycle cost-effective, beginning in 2016:

- Reduce agency building energy intensity as measured in British Thermal Units per square foot by 2.5 percent annually through 2025;
- Improve data center energy efficiency at agency buildings;
- Ensure a minimum percentage of total building electric and thermal energy shall be from clean energy sources;
- Improve agency water use efficiency and management (including storm water management); and
- Improve agency fleet and vehicle efficiency and management by achieving minimum percentage GHG emission reductions.

Executive Order 13783. Issued on March 28, 2017, Executive Order 13783 — Promoting Energy Independence and Economic Growth — revokes multiple prior Executive Orders and memoranda including Executive Order 13653, the Power Sector Carbon Pollution Standards, Presidential Memorandum – Mitigating Impacts on Natural Resources from Development and Encouraging Related Private Investment, and Presidential Memorandum – Climate Change and National Security, as well as other federal reports and provisions. Executive Order 13783 represents a reversal on federal climate policy relative to the work of previous administrations and its objective is to reduce the regulatory framework applicable to GHG emissions to spur fossil fuel extraction. This Executive Order “established a national policy to promote the clean and safe development of our energy resources while reducing unnecessary regulatory burdens” (Federal Register 2017).⁸⁰ The order also “directs the U.S. EPA to review existing regulations, orders, guidance documents and policies that potentially burden the development or use of domestically produced energy resources.” As of April 2020, the Council on Environmental Quality (CEQ) is considering updating its National Environmental Policy (NEPA) implementing regulations and has

⁸⁰ Federal Register, *Executive Order 13783 of March 28, 2017: Promoting Energy Independence and Economic Growth*, Vol. 82, No. 61, March 21, 2017.

issued a Notice of Proposed Rulemaking that incorporates Executive Order 13783.⁸¹ How these proposed rule changes will affect GHG emissions cannot be predicted at this time.

Executive Order 13795. Issued on April 28, 2017, Executive Order 13795 — Implementing an America-First Offshore Energy Strategy — directs the “policy of the United States to encourage energy exploration and production, including on the Outer Continental Shelf, in order to maintain the Nation’s position as a global energy leader and foster energy security and resilience for the benefit of the American people, while ensuring that any such activity is safe and environmental responsible”.⁸² The objective of the order is to expand the opportunity for offshore energy development by removing restrictions on resource exploration and extraction. This Executive Order prioritizes the development of offshore energy resources over the protection of National Marine Sanctuaries and authorizes the review and potential revision or withdrawal of the Bureau of Ocean Energy Management’s Proposed Rule entitled “Air Quality Control, Reporting, and Compliance,” 81 Federal Register 19718 and any other related rules and guidance. The implications of implementing Executive Order 13795 with regards to the national GHG emissions inventory cannot be reasonably determined at this time.

Presidential Executive Order 13990. President Biden signed Executive Order 13990 – Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis — on January 20, 2021. The order directs all executive departments and agencies to immediately review and, as appropriate and consistent with applicable law, take action to address the promulgation of Federal regulations and other actions during the 2017–2021 executive tenure that conflict with the following national objectives: to improve public health and protect the environment; to ensure access to clean air and water; to limit exposure to dangerous chemicals and pesticides; to hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; to reduce GHG emissions; to bolster resilience to the impacts of climate change; to restore and expand our national treasures and monuments; and to prioritize both environmental justice and the creation of the well-paying union jobs necessary to deliver these goals.⁸³

Presidential Executive Order 14008. President Biden signed Executive Order 14008 – Tackling the Climate Crisis At Home and Abroad — on January 27, 2021. The order affirmed the United States as rejoining the

⁸¹ Council on Environmental Quality, *CEQ NEPA Regulations*, 2020.

⁸² Federal Register, *Executive Order 13783 of March 28, 2017: Promoting Energy Independence and Economic Growth*, Vol. 82, No. 61, March 21, 2017.

⁸³ Federal Register, *Executive Order 13990 of January 20, 2021: Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, Vol. 86, No. 14, January 25, 2021.

Paris Agreement and expressed its commitment to exercising leadership in promoting global climate ambition to meet the climate challenge.⁸⁴

State

The state of California has implemented a series of greenhouse gas plans and policies aimed at reducing state greenhouse gas emissions. Measures applicable to the project are summarized below:

California Air Resources Board. The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California's State Implementation Plan (SIP), for which it works closely with the Federal Government and the local air districts. The SIP is required for the State to take over implementation of the Federal Clean Air Act. CARB also has primary responsibility for adopting regulations to meet the State's goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

Statewide GHG Reduction Targets and Scoping Plans. Executive Order S-3-05, Assembly Bill 32, Senate Bill 32, 2017 Scoping Plan (CARB), Executive Order B-55-18, Cap-and-Trade Program, Senate Bill 350, Senate Bill 1383, Senate Bill 97, Senate Bill 375, Emission Performance Standards, Renewable Portfolio Standards (SB 1078, SB 107, SB X 1-2, and SB 100), Assembly Bill 1493, Low Carbon Fuel Standard (Executive Order S-01-07), Advanced Clean Cars Program, Senate Bill 743, California Integrated Waste Management Act (AB 341), California Appliance Efficiency Regulations, California Green Building Code (California Code of Regulations Title 24).

Executive Order S-3-05. Executive Order S-3-05, issued in June 2005, established GHG emissions targets for the State, as well as a process to ensure the targets are met. The order directed the Secretary for the CalEPA to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. As a result of this executive order, the California Climate Action Team (CCAT), led by

⁸⁴ Federal Register, *Executive Order 14008 of January 27, 2021: Tackling the Climate Crisis at Home and Abroad*, Vol. 86, No. 19, February 1, 2021.

the Secretary of the CalEPA, was formed. The CCAT is made up of representatives from a number of State agencies and was formed to implement global warming emission reduction programs and reporting on the progress made toward meeting statewide targets established under the Executive Order. The CCAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order (CalEPA 2006). The statewide GHG targets are as follows:

- By 2010, reduce to 2000 emission levels;
- By 2020, reduce to 1990 emission levels; and
- By 2050, reduce to 80 percent below 1990 levels.

However, with the adoption of the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32), discussed below, the Legislature did not adopt the 2050 horizon-year goal from Executive Order No. S-3-05. In the last legislative session, the Legislature rejected legislation to enact the Executive Order's 2050 goal.⁸⁵

The original mandate for the CCAT was to develop proposed measures to meet the emission reduction targets set forth in E.O. S-3-05. The CAT has since expanded and currently has members from 18 state agencies and departments. The CCAT also has ten working groups, which coordinate policies among their members. The working groups and their major areas of focus are:

- Agriculture: Focusing on opportunities for agriculture to reduce GHG emissions through efficiency improvements and alternative energy projects, while adapting agricultural systems to climate change;
- Biodiversity: Designing policies to protect species and natural habitats from the effects of climate change;
- Energy: Reducing GHG emissions through extensive energy efficiency policies and renewable energy generation;
- Forestry: Coupling GHG mitigation efforts with climate change adaptation related to forest preservation and resilience, waste to energy programs and forest offset protocols;

⁸⁵ The original version of SB 32 as introduced in the Legislature contained a commitment to the 2050 goal, but this commitment was not included in the final version of the bill. See: https://leginfo.ca.gov/faces/billVersionsCompareClient.xhtml?bill_id=201520160SB32&cversion=20150SB3299I. In addition, the Supreme Court recently held in *Cleveland National Forest Foundation et al. v San Diego Association of Governments (SANDAG)* (S223603, July 13, 2017) that SANDAG did not abuse its discretion in declining to adopt the 2050 goal as a measure of significance in an analysis of the consistency of projected 2050 GHG emissions with the goals in Executive Order S-3-05.

- Land Use and Infrastructure: Linking land use and infrastructure planning to efforts to reduce GHG from vehicles and adaptation to changing climatic conditions;
- Oceans and Coastal: Evaluating the effects of sea level rise and changes in coastal storm patterns on human and natural systems in California;
- Public Health: Evaluating the effects of GHG mitigation policies on public health and adapting public health systems to cope with changing climatic conditions;
- Research: Coordinating research concerning impacts of and responses to climate change in California;
- State Government: Evaluating and implementing strategies to reduce GHG emissions resulting from state government operations; and
- Water: Reducing GHG impacts associated with the state's water.

The CCAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, transit-oriented development, and high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population growth and workforce and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" involve the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.⁸⁶

Assembly Bill 32. The California Global Warming Solutions Act of 2006 (AB 32) was signed into law in September 2006 after considerable study and expert testimony before the Legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. AB 32 set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.⁸⁷

The heart of AB 32 is the requirement to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 required CARB to adopt rules and regulations in an open public process to achieve the maximum

⁸⁶ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, 2006.

⁸⁷ Office of Legislative Counsel of California, *The California Global Warming Solutions Act of 2006 (AB 32)*, 2006.

technologically feasible and cost-effective GHG reductions. CARB accomplished the key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures.⁸⁸ These were later supplemented by adding six other discrete early action measures.⁸⁹
- January 1, 2008. Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.⁹⁰
- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted Climate Change Scoping Plan: A Framework for Change (Scoping Plan).⁹¹
- January 1, 2010. Adoption and enforcement of regulations to implement the “discrete” actions. Several early action measures have been adopted and became effective on January 1, 2010.^{92,93}
- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions.⁹⁴ CARB's Board ordered its Executive Director to prepare a final regulatory package for cap-and-trade on December 16, 2010.⁹⁵
- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 became enforceable.

As noted above, CARB adopted the Scoping Plan in 2008 to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission level by

⁸⁸ CARB, *Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California*, 2007.

⁸⁹ CARB, *Public Meeting to Consider Approval of Additions to the List of Early Action Measures to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions*, 2007.

⁹⁰ CARB, *California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*, 2007.

⁹¹ CARB, *Climate Change Scoping Plan*, 2008.

⁹² CARB, *Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California*, 2007.

⁹³ CARB, *Public Meeting to Consider Approval of Additions to the List of Early Action Measures to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions*, 2007.

⁹⁴ CARB, *Cap and Trade 2010*, 2011.

⁹⁵ CARB, *California Cap-and-Trade Program, Resolution 10-42*, 2010.

2020 would require an approximately 28.5 percent reduction of GHG emissions in the absence of new laws and regulations (referred to as “business as usual” or “No Action Taken”). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, and identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. Key elements of the Scoping Plan include the following:⁹⁶

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;
- Adopting and implementing measures pursuant to existing state laws and policies, such as California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In connection with the preparation of the environmental impact analyses (referred to as the Functional Equivalent Document [FED] and the Supplement to the FED) to support AB 32 Scoping Plan, CARB released revised estimates of the expected 2020 emission reductions in consideration of the economic recession and the availability of updated information from development of measure specific regulations. Incorporation of revised estimates in consideration of the economic recession reduced the projected 2020 emissions from 596 metric tons of CO₂ equivalent (MTCO₂e) to 545 million MTCO₂e (MMTCO₂e) (CARB 2011c). Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 MMTCO₂e, or 21.7 percent. This revised reduction represents a 6.8 percentage point reduction from the 28.5 percent level determined in CARB's 2008 Scoping Plan. The 2020 AB 32 baseline was also updated to account for measures incorporated into the inventory, including Pavley (vehicle

⁹⁶ CARB, *Climate Change Scoping Plan*, 2008.

model-years 2009 to 2016) and the renewable portfolio standard (12 percent to 20 percent). Inclusion of these measures further reduced the 2020 baseline to 507 MMTCO₂e.

Executive Order B-30-15. On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- Ordered all state agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

Senate Bill 32. In 2016, the Legislature passed Senate Bill (SB) 32 with the companion bill AB 197, which further requires California to reduce GHG emissions to 40 percent below 1990 levels by 2030. The bill targets reductions from the leading GHG emitters in the State. Transportation is the largest sector of GHG emissions in California and will be a primary subject for reductions. Through advances in technology and improved public transportation, the State plans to reduce GHG emissions from transportation sources to assist in meeting the 2030 reduction goal. AB 197, signed September 8, 2016, is a bill linked to SB 32 and signed on September 8, 2016, prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two Members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

2017 Scoping Plan. In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan in December 2017.⁹⁷ The 2017 Update builds upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile

⁹⁷ CARB, *California's 2017 Climate Change Scoping Plan*, November 2017.

sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constraints and reduces emissions at covered sources.⁹⁸

CARB's projected Statewide 2030 emissions takes into account 2020 GHG reduction policies and programs.⁹⁹ The 2017 Scoping Plan also addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions would be achieved from electricity sector standards (i.e., utility providers to supply 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. Implementation of mobile source strategies (cleaner technology and fuels) include the following:

- At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025
- At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030
- Further increase GHG stringency on all light-duty vehicles beyond existing Advanced
- Clean Cars regulations
- Medium- and heavy-duty GHG Phase 2
- Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low- NOX standard.
- Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for Class 3–7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.
- Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional

⁹⁸ CARB, *California's 2017 Climate Change Scoping Plan*, November 2017.

⁹⁹ CARB, *California's 2017 Climate Change Scoping Plan*, November 2017.

VTM reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”

The alternatives in the Scoping Plan are designed to consider various combinations of these programs, as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030.

The 2017 Scoping Plan discusses the role of local governments in meeting the State’s GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations.¹⁰⁰ Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.¹⁰¹

For individual projects under CEQA, the 2017 Scoping Plan states that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State’s long-term goals, and climate change science (CARB 2017).

The City of Los Angeles has not developed per capita targets for 2030 or 2050; however, the City recognizes that GHG emissions reductions are necessary in the public and private sectors. The City has taken the initiative in combating climate change by developing programs such as the Green New Deal and Green Building Code. Each of these programs is discussed further below.

A summary of the required estimated GHG emissions reductions is provided in **Table 14**.

¹⁰⁰ CARB, *California’s 2017 Climate Change Scoping Plan*, November 2017.

¹⁰¹ CARB, *California’s 2017 Climate Change Scoping Plan*, November 2017.

Table 14
Required Estimated Statewide Greenhouse Gas Emissions Reductions

Emissions Scenario	GHG Emissions (MMTCO₂e)
2008 Scoping Plan (IPCC SAR)	
2020 BAU Forecast (2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	169 (28.4%) ¹
2014 Scoping Plan Update (IPCC AR4)	
2020 BAU Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	78.4 (15.4%) ²
2017 Scoping Plan Update	
2030 BAU Forecast ("Reference Scenario" – 2020 GHG reduction policies and programs)	389
2030 Emissions Target (i.e., 40% below 1990 Level)	260
Reduction below Business-As-Usual to Achieve 40% below 1990 Level by 2030	129 (33.2%) ³

MMTCO₂e = million metric tons of carbon dioxide equivalents

¹ $596 - 427 = 169 / 596 = 28.4\%$

² $509.4 - 431 = 78.4 / 509.4 = 15.4\%$

³ $389 - 260 = 129 / 389 = 33.2\%$

Source: CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; CARB, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017, <http://www.arb.ca.gov/cc/inventory/data/bau.htm>. Accessed May 2022; CARB, California's 2017 Climate Change Scoping Plan, November 2017.

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 MMTCO₂ of the 2030 reduction obligation.³² The State's short-lived climate pollutants strategy, which is for GHGs that remain in the atmosphere for shorter periods of time compared to longer-lived GHGs like CO₂, is expected to cover approximately 17 to 35 MMTCO₂e. The Renewables Portfolio Standard with 50 percent renewable electricity by 2030 is expected to cover approximately 3 MMTCO₂. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of zero emission vehicles and improving the freight system efficiency, and is expected to cover approximately 11 to 13 MMTCO₂. Under the Scoping Plan Scenario, CARB expects that the reduction in GHGs from doubling of the energy efficiency savings in natural gas and electricity end uses in the CEC 2015 Integrated Energy Policy Report by 2030 would cover approximately 7 to 9 MMTCO₂ of the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

Draft 2022 Scoping Plan. CARB released the Draft 2022 Scoping Plan Update in May 2022.¹⁰² The Draft 2022 Scoping Plan Update identifies a technologically feasible, cost-effective and equity-focused path to

¹⁰² CARB, *Draft 2022 Scoping Plan Update*, May 2022.

achieve carbon neutrality by 2045, or earlier, while also assessing the progress the State is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan. The Draft 2022 Update builds upon current and previous environmental justice efforts to integrate environmental justice directly into the plan to ensure that no community is left behind. Specifically, the Draft 2022 Update:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030;
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 or earlier;
- Focuses on strategies for reducing California’s dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs;
- Integrates equity and protecting California’s most impacted communities as a driving principle;
- Incorporates the contribution of natural and working lands to the state’s GHG emissions inventory, as well as its role in achieving carbon neutrality;
- Relies on the contemporary science, including the need to deploy all viable tools to address the existential threat that climate change poses, including carbon capture and sequestration as well as direct air capture.
- Evaluates multiple options for achieving GHG and carbon neutrality targets, as well as the public health benefits and economic impacts associated with each.

The Draft 2022 Update evaluated four scenarios to reach carbon neutrality and the most viable path to achieve the State’s 2030 interim GHG reduction and 2035/2045 GHG neutrality targets. Ultimately, CARB staff selected Scenario 3 as the “Proposed Scenario,” which achieves carbon neutrality by 2045 by deploying a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies. Among the proposed actions by sector are the following:

- VMT per capita to be reduced 12% below 2019 levels by 2030 and 22% below 2019 levels by 2045.
- 100% of light duty vehicle (LDV) sales to be zero emission (ZEV) by 2035.
- New buildings, all electric appliances beginning in 2026 (residential) and 2029 (commercial).
- Existing residential buildings 80% of appliance sales are electric by 2030 and 100% by 2035.

- Existing commercial buildings 80% of appliance sales are electric by 2030 and 100% by 2045.
- Construction equipment 25% energy demand electrified by 2030 and 75% by 2045.

Executive Order B-55-18. On September 10, 2018, the governor issued Executive Order B-55-18, which established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Cap-and-Trade Program. As mentioned above, the Scoping Plan identifies a cap-and-trade program as one of the strategies the State will employ to reduce GHG emissions that cause climate change. The cap-and-trade program is implemented by CARB and “caps” GHG emissions from the industrial, utility, and transportation fuels sections, which account for roughly 85 percent of the State’s GHG emissions. The program works by establishing a hard cap on about 85 percent of total statewide GHG emissions. The cap starts at expected business-as-usual emissions levels in 2012 and declines two to three percent per year. Originally with a planning horizon of 2020, the recent approval of AB 398 in July 2017 extended the program until 2030. Fewer GHG emissions allowances are available each year, requiring covered sources to reduce their emissions or pay increasingly higher prices for those allowances. The cap level is set in 2030 to ensure California complies with SB 32’s emission reduction target of 40 percent below 1990 GHG emission levels.

The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013-2014) includes all electricity generated and imported into California (the first deliverer of electricity into the State is the “capped” entity and the *one that* will have to purchase allowances as appropriate), and large industrial facilities emitting more than 25,000 MTCO_{2e} per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015 onward) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels. The regulated entity will be the fuel provider that distributes the fuel upstream (not the gas station). In total, the cap-and-trade program is expected to include roughly 350 large businesses, representing about 600 facilities. Individuals and small businesses will not be regulated.

Under the program, companies do not have individual or facility-specific reduction requirements. Rather, all companies covered by the regulation are required to turn in allowances¹⁰³ in an amount equal to their total GHG emissions during each phase of the program. The program gives companies the flexibility to either trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more will have to turn in more allowances, and companies that can cut their emissions

¹⁰³ “Allowance” means a limited tradable authorization to emit up to one metric ton of carbon dioxide equivalent.

will have to turn in fewer allowances. Furthermore, as the cap declines, total GHG emissions are reduced. On October 20, 2011, CARB's Board adopted the final cap-and-trade regulation. The cap-and-trade program began on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions.¹⁰⁴ In July 2017, the Legislature passed legislation to extend the cap-and-trade program to 2030.¹⁰⁵

Senate Bill 350. Adopted on October 7, 2015, SB 350 supports the reduction of GHG emissions from the electricity sector through a number of measures, including requiring electricity providers to achieve a 50 percent renewables portfolio standard by 2030, a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030.

Senate Bill 1383. Approved by the governor in September 2016, SB 1383 requires the CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. The bill requires the strategy to achieve the following reduction targets by 2030:

- Methane – 40 percent below 2013 levels
- Hydrofluorocarbons – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

The bill also requires California Department of Resources Recycling and Recovery (CalRecycle), in consultation with the State board, to adopt regulations that achieve specified targets for reducing organic waste in landfills.

Senate Bill 97. Per SB 97, which was signed into law in 2007, the California Natural Resources Agency adopted amendments to the *State CEQA Guidelines*, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment (codified as Public Resources Code [PRC] 21083.05). Specifically, PRC 21083.05 states, "[t]he Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions."

Sustainable Communities and Climate Protection Act (Senate Bill 375). The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions, was adopted by the

¹⁰⁴ CARB, *California Cap-and-Trade Program*, Resolution 10-42, 2015.

¹⁰⁵ Office of the Governor, *Governor Brown Signs Landmark Climate Bill to Extend California's Cap-and-Trade Program*, 2017.

State on September 30, 2008. SB 375 finds that the “transportation sector is the single largest contributor of greenhouse gases of any sector.”¹⁰⁶ Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the Metropolitan Planning Organization in which the City of Los Angeles is located in. CARB set targets for 2020 and 2035 for each of the 18 metropolitan planning organization regions in 2010, and updated them in 2018.¹⁰⁷ In March 2018, the CARB updated the SB 375 targets for the SCAG region to require an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions.¹⁰⁸ As discussed further below, SCAG has adopted an updated Regional Transportation Plan / Sustainable Community Strategies (RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals.¹⁰⁹

Under SB 375, the target must be incorporated within that region’s Regional Transportation Plan (RTP), which is used for long-term transportation planning, in a Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plans) are not required to be consistent with either the RTP or SCS.

Emission Performance Standards. SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

Renewable Portfolio Standards (SB 1078, SB 107, SB X 1-2, and SB 100). Established in 2002 under SB 1078, and accelerated in 2006 under SB 107, in 2011 under SB X 1-2, and again in 2018 under SB 100, California’s Renewable Portfolio Standards (RPS) require retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 44 percent

¹⁰⁶ State of California, Senate Bill No. 375, September 30, 2008.

¹⁰⁷ CARB, Sustainable Communities & Climate Protection Program – About. <https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program#:~:text=The%20Sustainable%20Communities%20and%20Climate,housing%2C%20and%20land%20use%20planning>, accessed August 16, 2022.

¹⁰⁸ CARB, SB 375 Regional Greenhouse Gas Emissions Reduction Targets, <https://www.arb.ca.gov/cc/sb375/finaltargets2018.pdf>, accessed August 16, 2022.

¹⁰⁹ SCAG, Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, p. 5, May 7, 2020.

by 2024, 52 percent by 2027, and 60 percent in 2030.^{110, 111} Additionally, the State has made a commitment that renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity by 2045.¹¹² Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SB X 1-2 added, for the first time, publicly-owned utilities to the entities subject to RPS.

Assembly Bill 1493. Mobile Source Reductions Assembly Bill 1493, the “Pavley Standard,” required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the baseline for reduction.¹¹³ In 2004, CARB applied to the U.S. EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. On June 30, 2009, the U.S. EPA granted the waiver with the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles (cars and light trucks), by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California.

Low Carbon Fuel Standard (Executive Order S-01-07). Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.¹¹⁴ In 2009, CARB approved for adoption the LCFS regulation, which became fully effective in April 2010 and is codified at Title 17, California Code of Regulations (CCR), Sections 95480-95490. The LCFS reduced GHG emissions by reducing the carbon intensity of transportation fuels used in California by 10 percent between 2011 and 2020. In 2018, CARB approved amendments to LCFS regulations, which included strengthening and smoothing the carbon intensity benchmarks through 2030 in-line with California's 2030 GHG emission reduction target enacted through SB 32, adding new crediting opportunities to promote zero emission

¹¹⁰ Office of Legislative Counsel of California, *Senate Bill 1078*, 2002.

¹¹¹ Office of Legislative Counsel of California, *Senate Bill 1368*, 2006.

¹¹² Office of Legislative Counsel of California, *Clean Car Standards – Pavley, Assembly Bill 1493*, 2018.

¹¹³ CARB, *Clean Car Standards – Pavley, Assembly Bill 1493*, 2017.

¹¹⁴ CARB, *Initial Statement of Reasons for Proposed Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources*, 2009.

vehicle adoption, alternative jet fuel, carbon capture and sequestration, and advanced technologies to achieve deep decarbonization in the transportation sector.

Advanced Clean Cars Program. In 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

Senate Bill 743 (SB 743). SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT), which contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for certain urban infill projects and eliminating the measurement of auto delay, including Level of Service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the Governor’s Office of Planning and Research (OPR) to develop revisions to the *CEQA Guidelines* establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the “...reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses.” It also allows OPR to develop alternative metrics outside of transit priority areas. In December 2018, the Natural Resources Agency updated the *CEQA Guidelines* and provided guidance for implementing SB 743.

California Integrated Waste Management Act (AB 341). The California Integrated Waste Management Act of 1989, as modified by AB 341, requires each jurisdiction’s source reduction and recycling element to include an implementation schedule that shows: diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; diversion of 50 percent of all solid waste on and after January 1, 2000; and diversion of 75 percent of all solid waste by 2020, and annually thereafter.

California Appliance Efficiency Regulations. The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

California Green Building Code (California Code of Regulations Title 24). Although not originally aimed at reducing GHG emissions, CCR Title 24 Part 6: *California’s Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24), was first adopted in 1978 in response to a legislative mandate to reduce

California's energy consumption. Since then, Title 24 has been amended to recognize that energy-efficient buildings require less electricity and reduce fuel consumption, which subsequently reduces GHG emissions. The current 2019 Title 24 standards were adopted, among other reasons, to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2019 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CalGreen) Code (CCR Title 24, Part 11). Title 24 standards are updated triennially; the next update is scheduled to be adopted in 2022 and will take effect on January 1, 2023.

CEQA Guidelines. In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97) (Chapter 185, Statutes of 2007), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new *CEQA Guidelines* for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted *CEQA Guidelines* that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the guidelines.¹¹⁵ The guidelines require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.¹¹⁶

¹¹⁵ See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

¹¹⁶ 14 Cal. Code Regs. § 15064.4(b).

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of California Environmental Quality Act’s requirements for cumulative impact analysis.”¹¹⁷

Senate Bill 1 (SB 1) and Senate Bill 1017 (SB 1017) (Million Solar Roofs). SB 1 and SB 1017, enacted in August 2006, set a goal to install 3,000 megawatts of new solar capacity by 2017 – with a stated intent to move the state toward a cleaner energy future and help lower the cost of solar systems for consumers. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time. It provides up to \$3.3 billion in financial incentives that decline over time.

GHG Emissions Standards for Baseload Generation. SB 1368, which was signed into law on September 29, 2006, prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant. This performance standard (i.e., reducing long-term GHG emissions as a result of electrical baseload generation) applies to electricity generated both within and outside of California, and to publicly owned, as well as investor-owned, electric utilities.

Senate Bill 350 (SB 350). Adopted on October 7, 2015, SB 350 supports the reduction of GHG emissions from the electricity sector through a number of measures, including requiring electricity providers to achieve a 50 percent renewable portfolio standard by 2030, a cumulative doubling of statewide energy efficiency savings in electricity and natural gas by retail customers by 2030.

California Green Building Standards Code (CalGreen Code) (California Code of Regulations [CCR], Title 24). Although not originally aimed at reducing GHG emissions, CCR Title 24 Part 6: California’s Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24), was first adopted in 1978 in response to a legislative mandate to reduce California’s energy consumption. Since then, Title 24 has been amended to recognize that energy-efficient buildings require less electricity and reduce fuel consumption, which subsequently decreases GHG emissions. The current 2016 Title 24 standards were adopted, among other reasons, to respond to the requirements of AB 32. The goals of the Title 24 standards include achieving a 20 percent reduction of indoor water use and a 50 percent reduction of construction waste. Specifically, new development projects constructed within California after January 1, 2017, are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the CalGreen Code

¹¹⁷ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

(CCR, Title 24, Part 11). The outdoor water use standards of the CalGreen Code, which requires a 20 percent reduction in indoor water use, are already addressed by the City's Water Conservation Ordinance.

Regional

SCAG Regional Transportation Plan/Sustainable Communities Strategy. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS) in October 2020. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as micro transit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier thanks to an expanded regional charging network.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and 8.4 million jobs.¹¹⁸ By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas¹¹⁹ (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2016 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's TPAs. TPAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

¹¹⁸ 2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.

¹¹⁹ Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals.¹²⁰ Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals (i.e., SB 375 goal). The reductions generated by fuel economy improvements are already included as part of the State’s GHG emissions reduction program and are not double counted in the SB 375 target calculation.

South Coast Air Quality Management District CEQA Guidance. The City of Los Angeles is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Geronio Pass area in Riverside County. The South Coast Air Quality Management District (SCAQMD) is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.¹²¹ A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.¹²² The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial

¹²⁰ SCAG, *Final 2020–2045 RTP/SCS, Chapter 0: Making Connections*, p. 5, May 7, 2020.

¹²¹ SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, <http://www3.aqmd.gov/hb/2008/December/081231a.htm>, accessed August 16, 2022.

¹²² SCAQMD, *Greenhouse Gases CEQA Significance Thresholds*, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2>, accessed August 16, 2022.

projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

Local

Sustainable City pLAN (pLAN). In addition to GreenLA, Mayor Eric Garcetti released Los Angeles’s first-ever Sustainable City pLAN on April 8, 2015.¹²³ The Sustainable City pLAN is a roadmap to achieving short-term results and sets a path to strengthen and transform the City in future decades. Actionable goals include increasing the green building standard for new construction, creating a benchmarking policy for building energy use, developing “blue, green, and black” waste bin infrastructure, reducing water use by 20 percent, and possibly requiring LEED Silver or better certification for new construction.¹²⁴ In 2019, the Sustainable City pLAN was updated with new goals, targets, and actions through adoption of L.A.’s Green New Deal as discussed in greater detail below.

Los Angeles Green New Deal. The City of Los Angeles addressed the issue of global climate change in Green LA, An Action Plan to Lead the Nation in Fighting Global Warming (“LA Green Plan/ClimateLA”) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. Released in April 2019, L.A.’s Green New Deal provides a four year update to the City’s first Sustainable City pLAN that was first released in 2015.¹²⁵ While not officially adopted legislation, L.A.’s Green New Deal serves as policy guidance for City agencies.

Within the Green New Deal, “Climate Mitigation,” or reduction of GHG is one of eight explicit benefits that help define its strategies and goals. These include reducing GHG emissions through near-term outcomes:

- Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/sq.ft in 2015).
- All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.

¹²³ City of Los Angeles, *Los Angeles Sustainable City pLAN*, April 2015. Available at: https://plan.lamayor.org/background/background_plan.html, accessed August 16, 2022.

¹²⁴ City of Los Angeles, *Los Angeles Sustainable City pLAN*, April 2015. Available at: https://plan.lamayor.org/background/background_plan.html, accessed August 16, 2022.

¹²⁵ City of Los Angeles, *Sustainable City pLAN*, April 2015.

- Increase cumulative new housing unit construction to 150,000 by 2025; and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides, or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 3 degrees by 2035.
- Ensure the proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025; 75 percent by 2035; and 100 percent by 2050.

Mobility Plan 2035. Mobility Plan 2035, updated in September 2016, serves as the Mobility Element of the General Plan. Mobility Plan 2035 establishes new street designations, classifies each of the City’s arterial streets and incorporates a “complete street” policy framework (i.e., the idea that transportation facilities should be designed for all types of users, including pedestrians, cyclists, and trucks, as well as passenger vehicles), thus providing a foundation for future policies and principles promoting residents’ interaction with their streets. Discussed in detail in **Section 4.10, Land Use and Planning**, Mobility Plan 2035 also promotes equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Existing Buildings Energy and Water Efficiency (EBEWE) Ordinance. Effective in 2017, the EBEWE Ordinance makes public the annual energy and water consumption of all buildings over 20,000 square feet in the City. Beginning in 2017, privately owned buildings that are 20,000 square feet or more and buildings owned by the City that are 7,500 or more are required to be benchmarked, and owners must disclose annual

energy and water consumption. Privately owned buildings that are 100,000 square feet or more must begin benchmarking reporting by December 1, 2017, and smaller buildings must begin reporting over the following two years. This Ordinance is designed to facilitate the comparison of buildings' energy and water consumption, and reduce building operating costs, leading to reduced GHG emissions.

City of Los Angeles Green Building Program. In December 2010, the Los Angeles City Council adopted various provisions of the CalGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CalGreen Code as the new Los Angeles Green Building Code (LA Green Building Code). As a result of continuing updates to the CalGreen Code, the City adopted the pertinent provisions of the 2019 CalGreen standards through Ordinance No. 186,488, approved December 11, 2019. The LA Green Building Code applies to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings. The purpose of the City's Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses five key areas:

- Site: location, site planning, landscaping, storm water management, construction and demolition recycling;
- Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation;
- Energy & Atmosphere: energy efficiency, and clean/renewable energy;
- Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and
- Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control.

The Standard of Sustainability establishes a requirement for non-residential projects at or above 50,000 square feet of floor area, high-rise residential (above six stories) projects at or above 50,000 square feet of floor area, or low-rise residential (six stories or less) of 50 or more dwelling units within buildings of at least 50,000 square feet of floor area to meet the intent of the United States Green Building Council's Leadership in Energy and Environmental Design (LEED) Certified level. The Standard also applies to

existing buildings that meet the minimum thresholds described above when redevelopment construction costs exceed a valuation of 50 percent of the existing building's replacement cost.

The voluntary Standard of Sustainable Excellence establishes an incentive program for projects that register with the LEED program, contract with a certified LEED professional, and can demonstrate how the project will achieve LEED certification at a Silver or higher level. These projects are eligible for priority processing services within the Department of City Planning and expedited services within the Bureau of Engineering, The Department of Building and Safety.

City of Los Angeles Solid Waste Programs and Ordinances. The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, whose goal is to lead the City towards being a “zero waste” City by 2030. These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion for the City to 76 percent as of 2013. The RENEW LA Plan, aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025. The City has also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City's Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City's zero waste goals. These programs reduce the number of trips to haul solid waste and therefore reduce the amount of petroleum-based fuels and energy used to process solid waste.

3.3 THRESHOLDS AND METHODOLOGY

Thresholds of Significance

Consistent with Appendix G of the *State CEQA Guidelines*, a project would have a significant impact if it would:

- 1) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- 2) Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gas emissions.

Neither the City nor the SCAQMD have adopted GHG significance thresholds applicable to the Ordinance. While the SCAQMD has adopted significance thresholds for industrial-type projects for which it is the lead agency under CEQA,¹²⁶ those industrial thresholds are not applicable to the Ordinance. In the absence of adopted thresholds and pursuant to *CEQA Guidelines* Section 15064.4, the City has the discretion to use a significance threshold relevant to the Ordinance. *CEQA Guidelines* Section 15064.4 is stated below:

Section 15064.4. Determining the Significance of Impacts from Greenhouse Gas Emissions.

- (a) *The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:*
 - (1) *Quantify greenhouse gas emissions resulting from a project; and/or*
 - (2) *Rely on a qualitative analysis or performance based standards.*
- (b) *In determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions. The agency's analysis should consider a timeframe that is appropriate for the project. The agency's analysis also must reasonably reflect evolving scientific knowledge and state regulatory schemes. A lead agency should consider the following factors, among others, when determining the significance of impacts from greenhouse gas emissions on the environment:*
 - (1) *The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;*

¹²⁶ SCAQMD, SCAQMD Air Quality Significance Thresholds, 2019.

- (2) *Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.*
- (3) *The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable.*
- (c) *A lead agency may use a model or methodology to estimate greenhouse gas emissions resulting from a project. The lead agency has discretion to select the model or methodology it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change. The lead agency must support its selection of a model or methodology with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use.*

Methodology

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated previously, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. As such, for purposes of this analysis, there are two distinct phases that would have the potential to change GHG emissions associated with oil and gas wells throughout the City: 1) Short-term and temporary abandonment related activities, and 2) Long-term changes to GHGs attributable to the cessation of oil and gas extraction and operations.

GHG emissions associated with short-term and temporary abandonment related activities were calculated using CalEEMod. Because these emissions would be short-term and temporary, they have been characterized as one-time GHG emission sources without the potential to increase long-term and recurring GHG emissions into the future. Long-term changes to GHGs attributable to the cessation of oil and gas

extraction and operations have been characterized quantitatively and qualitatively, and impacts have been assessed in a manner consistent with CEQA Guidelines Section 15064.4 (Determining the Significance of Impacts from Greenhouse Gas Emissions).

The City's methodology for assessing the significance of a project's GHG impacts generally includes 1) an evaluation of a project's potential to generate GHG emissions, and 2) if a project does generate a net increase in GHG emissions, an evaluation if the project conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Thus, because many projects in the City generate a net increase in GHG emissions, both GHG Checklist Questions are typically evaluated together. However, as discussed below, because the Ordinance would not have the potential to generate an increase in long-term GHG emissions, each Checklist Question has been evaluated individually under GHG Impact 1 and GHG Impact 2, respectively.

3.4 PROJECT IMPACTS

GHG Impact 1 **Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (*Less than Significant*).**

Similar to the short-term and temporary air quality impact discussion provided previously (see **Section 2.6, Project Impacts**, AQ Impact 2 discussion), activities associated with well abandonment also have the potential to generate short-term and temporary GHG emissions. Following the same assumptions utilized in the air quality impact discussion, the estimated abandonment related GHG emissions are summarized in **Table 15, Oil & Gas Well Abandonment GHG Emissions (Per Well)**. Because these emissions would be short-term and temporary, they are considered one-time GHG emission sources without the potential to increase long-term and recurring GHG emissions into the future. As discussed in further detail below, long-term and recurring GHG emissions would be decreased compared to existing GHG emissions associated with oil and gas operations throughout the City as oil and gas operations cease. Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City.. As such, the one-time GHG emissions associated with abandonment are a

necessary step in the process to achieve long-term and recurring GHG reductions from terminating oil and gas operations throughout the City.

Table 15
Oil & Gas Well Abandonment GHG Emissions (Per Well)

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)^a
Off-Road Equipment	3.88
Worker Trips	1.25
Truck Trips	1.05
Total GHG Emissions (Per Well)	6.18

^a While abandonment would likely occur over a short period (i.e., 10 work days), the estimate is presented in metric tons per year as this is the standard unit of measurement to describe GHG emissions.

Source: Impact Sciences, September 2022. See Appendix B to this report.

As oil and gas wells cease operation, existing GHG emission sources associated with oil and gas wells and long-term GHG emissions would be decreased compared to existing emissions associated with oil and gas wells throughout the City. The following discussion identifies the potential GHG emissions that may be avoided as a result of the Ordinance.

Long-term GHG emissions fall into two general categories: 1) worker commutes and 2) fugitive emissions. In general, fugitive emissions from oil and gas activities may be attributed to the following primary types of sources: fugitive equipment leaks; process venting; evaporation losses; disposal of waste gas streams (e.g., by venting or flaring), and accidents and equipment failures. Fugitive leaks from piping and equipment are typically small yet detectable emissions from equipment where there are joints, flanges, and seals. Although joints and flanges are typically bolted, small amounts of hydrocarbons may be emitted through leaky joints.

It should be noted that fugitive emissions are difficult to quantify with a high degree of accuracy and there remains substantial uncertainty in the emission factors and calculation methodologies for oil and gas activities. This is due to the numerous types of sources and many variables to be considered. The key emission assessment issues are: (a) use of simple production-based emission factors is susceptible to excessive errors; (b) use of rigorous bottom-up approaches requires expert knowledge to apply and relies on detailed data which may be difficult and costly to obtain; and (c) measurement programs are time

consuming and very costly to perform.¹²⁷ Nevertheless, **Table 16, Avoided Oil & Gas GHG Emissions**, has been included as a good-faith effort to illustrate the potential scope of GHG emissions that may be avoided as a result of the Ordinance.¹²⁸ Due to the programmatic nature of this analysis and the many variables at each oil and gas well throughout the City, the quantified estimates in **Table 16** are included for illustrative purposes. Furthermore, while it is clear the Ordinance would result in a net benefit to local and regional GHG emissions, the degree to which GHG emissions may be avoided under the Ordinance is not the basis for the impact determination. Because the Ordinance would reduce long-term GHG emissions compared to existing emissions associated with oil and gas wells throughout the City, the Ordinance would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Furthermore, as discussed in **GHG Impact 2**, the Ordinance would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Therefore, this impact is *less than significant*.

Table 16
Avoided Oil & Gas GHG Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)^a
Worker Emissions	142
Fugitive Emissions	9,827
Total Avoided GHG Emissions	9,969

^a As described previously herein, abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe. It would be speculative to assess how many wells would be abandoned during a given year, month, or peak day. Thus, the total avoided GHG emissions estimated here represents the annual metric tons per year upon abandonment of all wells.
Source: Impact Sciences, September 2022. See Appendix B to this report.

GHG Impact 2 **Would implementation of the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (*Less than Significant*).**

As discussed previously, AB 32 required CARB to adopt a scoping plan indicating how reductions in significant GHG sources will be achieved through regulations, market mechanisms, and other actions. In 2008, CARB released the Climate Change Proposed Scoping Plan in October 2008 that contained an outline

¹²⁷ Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

¹²⁸ See **Appendix B** to this report for further information related to calculations and assumptions utilized to prepare these estimates.

of the proposed state strategies to achieve the 2020 greenhouse gas emission limits as outlined in AB 32. In response to SB 32, CARB adopted California's 2017 Climate Change Scoping Plan (2017 Update), which outlines the proposed framework of action for achieving California's SB 32 2030 GHG target: a 40 percent reduction in GHG emissions by 2030 relative to 1990 levels.¹²⁹ The 2030 target is intended to ensure that California remains on track to achieve the goal set forth by E.O. B-30-15 to reduce statewide GHG emissions by 2050 to 80 percent below 1990 levels.

The Ordinance would be consistent with the objectives of CARB's Scoping Plan, which is intended to reduce GHG emissions in accordance with AB 32 and SB 32. The Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other strategies to reduce GHGs. Most of these measures focus on area source emissions (e.g., energy production, distribution and usage, and high-GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., Low Carbon Fuel Standard), among others. The Ordinance would comply with all regulations adopted in furtherance of the Scoping Plan to the extent required by law and to the extent that they are applicable to the Ordinance. For example, abandonment activities will utilize equipment in compliance with regulations set forth by CARB. Mobile sources during abandonment would be subject to the requirements of California Assembly Bill 1493 (Pavley Standards), the Advanced Clean Cars Program, and the Low Carbon Fuel Standard Regulation. Additionally, while the Ordinance is not a GHG reduction plan, the Ordinance is a reflection of state, regional, and local goals to move away from reliance on oil and gas energy sources which will serve to reduce long-term GHG emissions and help the State achieve the GHG reductions mandated in AB 32 and SB 32. The State has enacted numerous legislative regulations to address climate change by reducing our dependence on fossil fuels to reduce GHG emissions. California's Renewable Portfolio Standards established by Senate Bill 1078 requires that 60% of our electricity generation be produced from clean renewable sources by 2030 and become carbon-free by 2045. This has contributed to California's move away from electricity powered by coal and natural gas and a progressive increase in the use of solar and wind energy sources. This has occurred for both utility scale energy generation as well as for new single-family residential uses which are required to meet their electricity needs by installing solar panels under the State's Title 24 building standards. For passenger vehicles, Executive Order N-79-20 would ban the sales of new gasoline and diesel passenger vehicles while requiring that only new zero-emission vehicles be sold by 2035. This Executive Order is also consistent with CARB's regulations transitioning from diesel trucks and vans to zero emission trucks, and public bus fleets to be fully electric by 2040. See also Tables 4 and 5 in the Ordinance's Initial Study for a comprehensive list of state, regional, and City policies that support the Ordinance). Thus, because the Ordinance is consistent with state, regional, and local goals to move away

¹²⁹ CARB, *California's 2017 Climate Change Scoping Plan*, November 2017.

from reliance on oil and gas energy sources, the Ordinance would not have the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions and this impact is *less than significant*.

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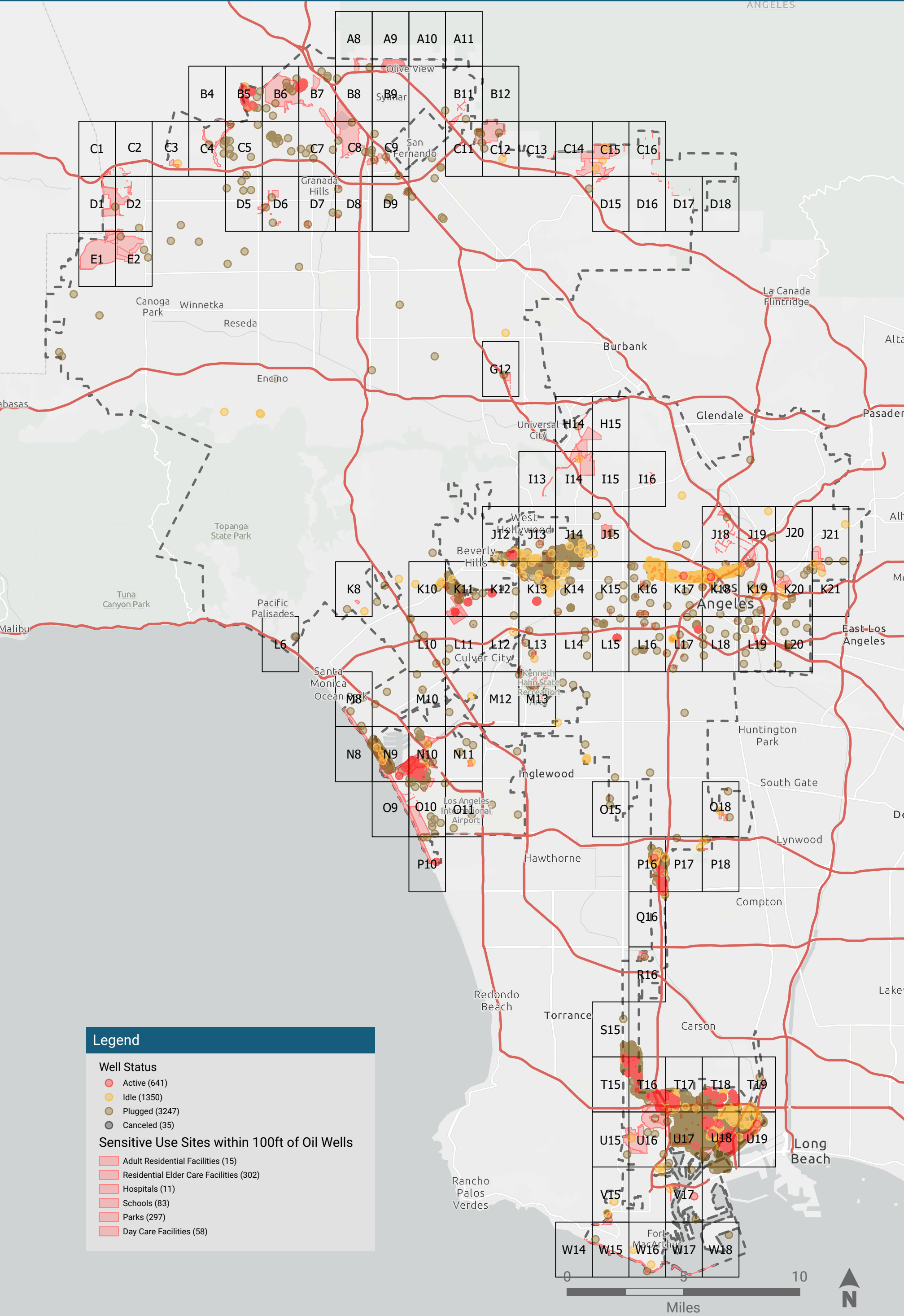
APPENDIX A

Sensitive Receptors

City of Los Angeles Oil Well Locations

Sensitive Use Sites Within 100 Feet of Oil Wells

DRAFT



Legend

Well Status

- Active (641)
- Idle (1350)
- Plugged (3247)
- Canceled (35)

Sensitive Use Sites within 100ft of Oil Wells

- Adult Residential Facilities (15)
- Residential Elder Care Facilities (302)
- Hospitals (11)
- Schools (83)
- Parks (297)
- Day Care Facilities (58)

APPENDIX B

Air Quality & GHG Technical Data

Existing Oil & Gas Well Emissions (2022)

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2e
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	MT/Year
Worker Emissions	1.99	3.52	34.8	0.08	2.73	0.53	
Fugitive Emissions	807.66						
Total	809.65	3.52	34.8	0.08	2.73	0.53	0

Notes:

CalEEMod used to estimate worker emissions; higher of the emissions between winter and summer presented
2022 year selected for emission factors

Assumed 641 active wells would generate an avg of 0.5 trips per well/day @ 15 miles per one way trip

Fugitive Gas Emissions based on calculations by Yorke Engineering for the Inglewood Oil Field Specific Plan

Fugitive Gas ROG emissions based on 1.26 lbs/day for 641 active wells.

As specific conditions of the 1350 idle wells are unknown at this time, fugitive emissions from these wells were not estimated.

Future Oil & Gas Well Emissions (2044) - Emissions to Be Avoided Under the Ordinance

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2e
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	MT/Year
Worker Emissions	1.12	1.11	16.6	0.06	2.71	0.5	142
Fugitive Emissions	807.66						9,826.53
Total	808.78	1.11	16.6	0.06	2.71	0.5	9,968.53

Notes:

CalEEMod used to estimate worker emissions; lower of the emissions between winter and summer presented
2044 year selected for future year emission factors

Assumed 641 active wells would generate an avg of 0.5 trips per well/day @ 15 miles per one way trip

Fugitive Gas Emissions based on calculations by Yorke Engineering for the Inglewood Oil Field Specific Plan

Fugitive Gas ROG emissions based on 1.26 lbs/day per well for 641 active wells.

Fugitive Gas CO2e emissions based on 15.33 MT/year per well for 641 active wells.

As specific conditions of the 1350 idle wells is unknown at this time, fugitive emissions from these wells were not estimated.

Oil & Gas Well Abandonment Emissions - Per Well

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2e
	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	lbs/day	MT/Year
Off-Road Equipment (On-site)	0.51	4.69	5.79	0.01	0.19	0.17	3.88
Worker Trips	0.09	0.1	1.51	0	0.02	0	1.25
Vendor (HHD Trucks)	0.01	0.31	0.14	0.005	0.02	0.01	1.05
Total	0.61	5.1	7.44	0.015	0.23	0.18	6.18

Notes:

CalEEMod used to estimate emissions

Assumed 10 work days, 1 drill rig, 1 pump, 1 welder, and 1 tractor/loader/backhoe

Assumed 10 worker trips and 3 HHD truck deliveries per day

City of LA Oil & Gas - Existing Workers Detailed Report

Table of Contents

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.4. Operations Emissions Compared Against Thresholds
 - 2.5. Operations Emissions by Sector, Unmitigated
- 4. Operations Emissions Details
 - 4.1. Mobile Emissions by Land Use
 - 4.1.1. Unmitigated
 - 4.2. Energy
 - 4.2.1. Electricity Emissions By Land Use - Unmitigated
 - 4.2.3. Natural Gas Emissions By Land Use - Unmitigated
 - 4.3. Area Emissions by Source

4.3.2. Unmitigated

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	City of LA Oil & Gas - Existing Workers
Lead Agency	Los Angeles
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	34.052961595397775, -118.2471716978192
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4039
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
User Defined Industrial	1.00	User Defined Unit	1.00	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.39	1.99	3.20	34.8	0.08	0.05	2.68	2.73	0.05	0.48	0.53	0.00	8,102	8,102	0.30	0.28	37.3	8,231
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.36	1.97	3.52	30.4	0.08	0.05	2.68	2.73	0.05	0.48	0.53	0.00	7,745	7,745	0.31	0.30	0.97	7,841
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.34	0.28	0.51	4.51	0.01	0.01	0.38	0.39	0.01	0.07	0.08	0.00	1,120	1,120	0.04	0.04	2.30	1,136
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06	0.05	0.09	0.82	< 0.005	< 0.005	0.07	0.07	< 0.005	0.01	0.01	0.00	185	185	0.01	0.01	0.38	188

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

City of LA Oil & Gas - Existing Workers Detailed Report, 8/30/2022

Mobile	2.39	1.99	3.20	34.8	0.08	0.05	2.68	2.73	0.05	0.48	0.53	—	8,102	8,102	0.30	0.28	37.3	8,231
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	2.39	1.99	3.20	34.8	0.08	0.05	2.68	2.73	0.05	0.48	0.53	0.00	8,102	8,102	0.30	0.28	37.3	8,231
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.36	1.97	3.52	30.4	0.08	0.05	2.68	2.73	0.05	0.48	0.53	—	7,745	7,745	0.31	0.30	0.97	7,841
Area	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	2.36	1.97	3.52	30.4	0.08	0.05	2.68	2.73	0.05	0.48	0.53	0.00	7,745	7,745	0.31	0.30	0.97	7,841
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.34	0.28	0.51	4.51	0.01	0.01	0.38	0.39	0.01	0.07	0.08	—	1,120	1,120	0.04	0.04	2.30	1,136
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.34	0.28	0.51	4.51	0.01	0.01	0.38	0.39	0.01	0.07	0.08	0.00	1,120	1,120	0.04	0.04	2.30	1,136
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.06	0.05	0.09	0.82	< 0.005	< 0.005	0.07	0.07	< 0.005	0.01	0.01	—	185	185	0.01	0.01	0.38	188
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health and Equity Evaluation Scorecard not completed.

8. User Changes to Default Data

Screen	Justification
Land Use	model run for worker trips only

City of LA Oil & Gas - Future Workers Detailed Report

Table of Contents

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.4. Operations Emissions Compared Against Thresholds
 - 2.5. Operations Emissions by Sector, Unmitigated
- 4. Operations Emissions Details
 - 4.1. Mobile Emissions by Land Use
 - 4.1.1. Unmitigated
 - 4.2. Energy
 - 4.2.1. Electricity Emissions By Land Use - Unmitigated
 - 4.2.3. Natural Gas Emissions By Land Use - Unmitigated
 - 4.3. Area Emissions by Source

4.3.2. Unmitigated

4.4. Water Emissions by Land Use

4.4.2. Unmitigated

4.5. Waste Emissions by Land Use

4.5.2. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	City of LA Oil & Gas - Future Workers
Lead Agency	Los Angeles
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	34.054169352718944, -118.24457962120411
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4039
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
User Defined Industrial	1.00	User Defined Unit	1.00	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.32	1.13	1.11	18.9	0.06	0.02	2.69	2.71	0.02	0.48	0.50	0.00	6,123	6,123	0.15	0.18	1.88	6,183
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.31	1.12	1.22	16.6	0.06	0.02	2.69	2.71	0.02	0.48	0.50	0.00	5,864	5,864	0.15	0.19	0.05	5,924
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.19	0.16	0.18	2.46	0.01	< 0.005	0.38	0.39	< 0.005	0.07	0.07	0.00	848	848	0.02	0.03	0.12	856
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.03	0.03	0.03	0.45	< 0.005	< 0.005	0.07	0.07	< 0.005	0.01	0.01	0.00	140	140	< 0.005	< 0.005	0.02	142

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	1.32	1.13	1.11	18.9	0.06	0.02	2.69	2.71	0.02	0.48	0.50	—	6,123	6,123	0.15	0.18	1.88	6,183
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	1.32	1.13	1.11	18.9	0.06	0.02	2.69	2.71	0.02	0.48	0.50	0.00	6,123	6,123	0.15	0.18	1.88	6,183
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.31	1.12	1.22	16.6	0.06	0.02	2.69	2.71	0.02	0.48	0.50	—	5,864	5,864	0.15	0.19	0.05	5,924
Area	—	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	1.31	1.12	1.22	16.6	0.06	0.02	2.69	2.71	0.02	0.48	0.50	0.00	5,864	5,864	0.15	0.19	0.05	5,924
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.19	0.16	0.18	2.46	0.01	< 0.005	0.38	0.39	< 0.005	0.07	0.07	—	848	848	0.02	0.03	0.12	856
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	0.19	0.16	0.18	2.46	0.01	< 0.005	0.38	0.39	< 0.005	0.07	0.07	0.00	848	848	0.02	0.03	0.12	856
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.03	0.03	0.03	0.45	< 0.005	< 0.005	0.07	0.07	< 0.005	0.01	0.01	—	140	140	< 0.005	< 0.005	0.02	142
Area	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Energy	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Water	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00

Total	0.03	0.03	0.03	0.45	< 0.005	< 0.005	0.07	0.07	< 0.005	0.01	0.01	0.00	140	140	< 0.005	< 0.005	0.02	142
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4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
User Defined Industrial	—	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	—	0.00

Project Located in a Designated Disadvantaged Community (Senate Bill 535)	Yes
Project Located in a Low-Income Community (Assembly Bill 1550)	Yes
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health and Equity Evaluation Scorecard not completed.

8. User Changes to Default Data

Screen	Justification
Land Use	model run for worker trips only

City of LA Oil & Gas - Abandonment Detailed Report

Table of Contents

- 1. Basic Project Information
 - 1.1. Basic Project Information
 - 1.2. Land Use Types
 - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
 - 2.1. Construction Emissions Compared Against Thresholds
 - 2.2. Construction Emissions by Year, Unmitigated
- 3. Construction Emissions Details
 - 3.1. Demolition (2024) - Unmitigated
- 4. Operations Emissions Details
 - 4.10. Soil Carbon Accumulation By Vegetation Type
 - 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated
 - 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated
 - 4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	City of LA Oil & Gas - Abandonment
Lead Agency	Los Angeles
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	0.50
Precipitation (days)	16.8
Location	34.0545406568893, -118.24387235523815
County	Los Angeles-South Coast
City	Los Angeles
Air District	South Coast AQMD
Air Basin	South Coast
TAZ	4039
EDFZ	16
Electric Utility	Los Angeles Department of Water & Power
Gas Utility	Southern California Gas

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
User Defined Industrial	1.00	User Defined Unit	1.00	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.73	0.60	5.10	7.43	0.01	0.19	0.32	0.51	0.18	0.08	0.25	—	1,355	1,355	0.06	0.05	1.61	1,374
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.02	0.02	0.14	0.20	< 0.005	0.01	0.01	0.01	< 0.005	< 0.005	0.01	—	36.8	36.8	< 0.005	< 0.005	0.02	37.3
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.10	6.10	< 0.005	< 0.005	< 0.005	6.18

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.73	0.60	5.10	7.43	0.01	0.19	0.32	0.51	0.18	0.08	0.25	—	1,355	1,355	0.06	0.05	1.61	1,374
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.02	0.02	0.14	0.20	< 0.005	0.01	0.01	0.01	< 0.005	< 0.005	0.01	—	36.8	36.8	< 0.005	< 0.005	0.02	37.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	< 0.005	< 0.005	0.03	0.04	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.10	6.10	< 0.005	< 0.005	< 0.005	6.18

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.51	4.69	5.79	0.01	0.19	—	0.19	0.17	—	0.17	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.13	0.16	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	23.3	23.3	< 0.005	< 0.005	—	23.4
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.87	3.87	< 0.005	< 0.005	—	3.88
Demolition	—	—	—	—	—	—	0.00	0.00	—	0.00	0.00	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.10	1.51	0.00	0.00	0.02	0.02	0.00	0.00	0.00	—	282	282	0.01	0.01	1.11	287
Vendor	0.02	0.01	0.31	0.14	< 0.005	< 0.005	0.02	0.02	< 0.005	0.01	0.01	—	221	221	0.01	0.04	0.50	232
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	7.44	7.44	< 0.005	< 0.005	0.01	7.54
Vendor	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.05	6.05	< 0.005	< 0.005	0.01	6.36
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	0.00	0.00	—	1.23	1.23	< 0.005	< 0.005	< 0.005	1.25
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.00	1.00	< 0.005	< 0.005	< 0.005	1.05
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Abandonment	Demolition	6/1/2024	6/14/2024	5.00	10.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Abandonment	Bore/Drill Rigs	Diesel	Average	1.00	8.00	33.0	0.73
Abandonment	Pumps	Diesel	Average	1.00	1.00	367	0.40
Abandonment	Welders	Diesel	Average	1.00	6.00	84.0	0.37
Abandonment	Tractors/Loaders/Backhoes	Diesel	Average	1.00	6.00	84.0	0.37

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
------------	-----------	-----------------------	----------------	-------------

Abandonment	—	—	—	—
Abandonment	Worker	20.0	18.5	LDA,LDT1,LDT2
Abandonment	Vendor	6.00	10.2	HHDT
Abandonment	Hauling	0.00	20.0	HHDT
Abandonment	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
------------	--	--	--	--	-----------------------------

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Abandonment	0.00	0.00	0.00	—	—

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

8. User Changes to Default Data

Screen	Justification
Land Use	1 acre per well site
Construction: Construction Phases	abandonment to last approximately 10 days per well.
Construction: Off-Road Equipment	equipment for abandonment
Construction: Trips and VMT	trips/deliveries per abandonment needs

APPENDIX B

Noise & Vibration Technical Report

City of Los Angeles
Oil and Gas Drilling Ordinance
Noise and Vibration
Technical Report

September 2022



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TABLE OF CONTENTS

Section	Page
1.0 Introduction	1
1.1 Project Location	1
1.2 Project Description	2
2.0 Environmental Setting	6
2.1 Fundamentals of Noise & Vibration.....	6
2.2 Noise Sensitive Receptors	11
2.3 Existing Conditions.....	12
3.0 Regulatory Framework.....	14
3.1 Regulatory Framework	14
4.0 Noise Analysis	22
4.1 Thresholds of Significance	22
4.2 Methodology.....	22
4.3 Impact Analysis.....	23
5.0 References.....	28

Appendix

A	Sensitive Receptors
B	Noise & Vibration Data

LIST OF TABLES

Table	Page
1 A-Weighted Decibel Scale	7
2 Building Noise Reduction Factors.....	8
3 Noise Levels Associated With Oil & Gas Operations.....	13
4 Construction Vibration Damage Criteria	15
5 Groundborne Vibration and Groundborne Noise Impact Criteria for General Assesment	16
6 Guideline Vibration Damage Potential Threshold Criteria.....	17
7 City of Los Angeles Presumed Ambient Noise Levels.....	18
8 Guidelines for Noise Compatible Land Use (CNEL)	21
9 Temporary Noise Levels During Well Abandonment - Unmitigated	24
10 Temporary Noise Levels During Well Abandonment - Mitigated.....	26
11 Temporary Vibration Levels During Well Abandonment.....	27

1.0 INTRODUCTION

This Noise and Vibration Technical Report describes the potential for noise and groundborne vibration impacts resulting from implementation of the proposed Oil and Gas Drilling Ordinance (Ordinance or Project) to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones within the City of Los Angeles (City). This report includes an evaluation of potential impacts associated with substantial temporary and permanent changes in ambient noise levels in the vicinity of oil and gas wells; exposure of people in the vicinity of oil and gas wells to excessive noise or groundborne vibration levels; and whether exposure is in excess of standards established in the City's General Plan or Noise Ordinance. This report has been prepared by Impact Sciences, Inc., in support of the environmental documentation being prepared pursuant to the California Environmental Quality Act (CEQA).

1.1 PROJECT LOCATION

The Project is a citywide code amendment applicable within the boundaries of the City. The City has an approximate land area of 465 square miles (297,600 acres) with an estimated population of nearly 4.0 million residents in 2020 (3,898,747), according to the 2020 Census. The City lies within Los Angeles County which encompasses 4,000 square miles, 88 incorporated cities, and more than 10 million residents (10,014,009), according to the 2020 Census. The City is divided into 15 Council Districts and 35 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

According to August 2022 data from the California Geologic Energy Management division (CalGEM), the City has 26 oil and gas fields that intersect city boundaries and 5,273 oil and gas wells. There are approximately 641 active, 1,350 idle, 35 canceled, and 3,247 plugged wells.¹ Of the City's idle wells, as of July 2022, 56 are orphan wells likely to have no responsible solvent operator. There are oil and gas facilities in nearly every section of the City.² While some wells are situated in heavy industrial areas, others are located within residential neighborhoods and amongst community parks and schools. Much of the existing oil drilling and extraction is within underserved communities throughout the City.

Wells are found in nearly all parts of the City including but not limited to the communities of Wilmington, Harbor Gateway, Downtown, West Los Angeles, South Los Angeles, and the Northeast San Fernando

¹ An active well is an oil well that has been drilled and completed, an idle well is inactive and not producing, but capable of being reactivated, a canceled well is one where a well permit was canceled prior to drilling, and a plugged well has been plugged and sealed to current standards.

² There are two gas storage fields within the City, the Aliso Canyon and the Playa Del Rey Fields, which are both operated by the Southern California Gas Company (SoCalGas). SoCalGas is the primary operator of underground natural gas fields, natural gas storage wells, and natural gas transmission facilities within the City. No natural gas wells operated by public utilities would be impacted by the Ordinance.

Valley. While some wells are situated in heavy industrial areas, others are located in neighborhoods within close proximity to residences, schools, and other sensitive uses. For a list of sensitive receptors located in proximity to wells throughout the City, please refer to **Appendix A** to this report.

1.2 PROJECT DESCRIPTION

The Project is a proposed ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (LAMC) to (1) eliminate the provisions of the LAMC that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; (2) end by-right oil and gas extraction in the M3-Heavy Industrial Zones; (3) declare existing oil and gas extraction within the City a nonconforming use to terminate within 20 years; and (4) prohibit new or expanded oil and gas extraction activities (such as the drilling of new wells or the redrilling or deepening of existing wells). The Ordinance permits maintenance of the wells that the Zoning Administrator determines is necessary to protect public health and safety or the environment. Twenty years from the effective date of the Ordinance, all nonconforming oil and gas extraction uses will terminate.

This Ordinance is not applicable to (1) common carrier oil pipelines intended for regionally-coordinated transport of hydrocarbons; (2) service stations or like uses; (3) refineries; and (4) oil and injection wells that are verified to be plugged and abandoned in accordance with all applicable local, state, and federal laws, rules and regulations, including the California Statutes and Regulations overseen by the California Geologic Energy Management division (CalGEM), and LAFD and for which the well pad has been restored suitably for its subsequent use, and (5) any well operated by a public utility regulated by the California Public Utilities Commission, including those operating at the Aliso Canyon and Playa Del Rey Gas Storage Fields.

The Ordinance does not set a specific timetable for the closure and abandonment of wells, regulate the abandonment of oil wells that have permanently ceased operation, or mandate or regulate the remediation of well sites where extraction has terminated permanently.³

The Ordinance will make existing oil and gas drilling operations legally nonconforming uses in the City, subject to a 20-year amortization period. Existing oil and gas extraction activities may continue to operate until the end of the amortization period after which time all drilling-related activities must cease. After a well ceases operation, current regulations require that the well be abandoned and plugged. However, the

³ Public Resources Code Section 21000 requires that a lead agency identify all feasible mitigation measures that will avoid or substantially lessen the significant environmental effects of the project. This MND identifies areas of potentially significant impacts that would occur as a result of abandonment activities (See Noise, Geology and Soils). In accordance with CEQA, mitigation measures are proposed where such impacts could be reduced by their imposition.

current regulations do not establish a set time period by which the abandonment process must be completed after a well ceases operation. As stated above, the Ordinance does not regulate abandonment when well operations permanently cease.

Currently it is unknown as to how many oil wells will permanently cease operations prior to the 20 year expiration date. This is because the time period that each of the City's approximately 1,991 active and idle wells will permanently cease extraction and undergo abandonment depends on a number of individual factors. For example, upon the Ordinance becoming effective, some operators may choose to conclude operations immediately, while others may have contractual obligations to the landowners of the drilling sites and operate for a few years before the site is abandoned. Others may continue to operate until the end of the 20-year amortization period. However, once a well permanently ceases operation, there is a financial and economic incentive for the oil well operator to complete the abandonment process to reduce the costs of maintaining the well site. Therefore, because there is no reasonable way to accurately predict the timeline for cessation and abandonment at the individual level, this analysis instead assumes all oil drilling will cease 20 years from the effective date of the Ordinance as required. Abandonment of individual wells may occur at any time during the 20-year timeframe, and potentially beyond the 20-year timeframe.

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated above, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. When a well is shut down, termination and abandonment activities will generally include (1) the cessation of production and drilling operations; (2) the closure and plugging of all oil and gas wells, including water flooding injection wells, except injection wells as permitted and demonstrated to be active and necessary by CalGEM; and (3) the plugging/capping of subsurface pipelines. Neither implementation of the Ordinance nor the oil well abandonment process should require excavation of previously undisturbed land and no new permanent structures would be constructed as part of the Project.

Termination activities of nonconforming oil and gas extraction must adhere to all applicable local, state, and federal laws, regulations, rules and standards, including the California Statutes and Regulations and all other requirements overseen by CalGEM as the principal regulatory authority for the closure of oil and gas extraction and production sites. Termination and abandonment activities will occur within previously disturbed and developed areas of the properties that encompass oil and gas extraction activities. In some cases, new access points may be necessary to allow for ingress/egress of equipment necessary to complete the abandonment of wells. However, no new permanent roads or permanent changes to existing roads would be necessary as part of the Project.

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.⁴ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. CalGEM conducts inspections at certain milestones for this scope of work, including the following:

- Operators conduct a series of pressure tests on the wells to identify that there are no leaks or that the pressure is unsafe to work on the well. A test to measure any levels of hydrogen sulfide is common.
- Operators use a drilling or maintenance rig to work on the well and prepare blowout prevention equipment for the well that will be plugged.
- CalGEM inspects the blowout prevention equipment to ensure that it is safe for the operator to continue with plugging and abandonment work.
- Operators use the rig to pull out various cables, tubing, and other connections from the well casing.
- Operators may require the use of brine water to clean out different segments of the well. If no debris or sand is observed, then the operators continue using the rig to remove cables, tubing, and more connections from the well.
- After the operator has removed the sufficient amount of tubings, casing, and connections and there are minimal amounts of debris observed, then the operator will bring a cement truck to begin pouring fresh water and cement mix down the well. CalGEM is required to observe this first segment of pouring

⁴ When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

as the inspector is looking to observe that the bottom hole is filled with the appropriate amount of cement.

- The operator continues to remove casings and tubings with support of the rig while also pouring cement down the well at depths deemed safe and clear enough to pour cement. Pressure testing of the well is frequently conducted to identify any safety risks.
- As the work nears the top segment of the well, the operator continues to use the rig and cement trucks are brought to the drill site to fill the well with cement. The ending segment can include up to 600 cubic feet of cement into the well's casings in order to displace any well fluids or debris. The operator will fill the well casing to the near very top and this process is observed by CalGEM and by the Los Angeles Fire Department.
- At the conclusion, the operator removes any blowout prevention equipment from the rig and the well is closed and steel welded with the API Number and the LAFD Well Number identified on the top cover.

Given the varied timeline of individual well abandonment and the fact the Ordinance does not establish any regulations related to well site remediation or redevelopment (except where mitigation measures are required to reduce identified potentially significant impacts), it would be speculative to contemplate when site remediation would occur after the wells are abandoned and the types of redevelopment and future land uses that may occur on former drill sites. What might get built and at what intensity or scale is not possible to identify or analyze at this time. Therefore, the scope of analysis in this Initial Study is limited to (1) cessation of oil and gas extraction in the city and (2) abandonment activities that are reasonably foreseeable. The analysis does not examine impacts from remediation and/or future development. Those impacts would be analyzed in subsequent environmental analyses at either the programmatic or project level.

2.0 ENVIRONMENTAL SETTING

2.1 FUNDAMENTALS OF NOISE & VIBRATION

Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies. For example, the human ear is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dB(A), is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dB(A) increase in noise level. Typically, changes in a community noise level of less than 3 dB(A) are not noticed by the human ear.⁵ Changes from 3 to 5 dB(A) may be noticed by some individuals who are sensitive to changes in noise. A greater than 5 dB(A) increase is readily noticeable, while the human ear perceives a 10 dB(A) increase in sound level to be a doubling of sound.

On the A-weighted scale, the range of human hearing extends from approximately 3 to 140 dB(A). **Table 1, A-Weighted Decibel Scale**, provides examples of A-weighted noise levels from common sources. Noise sources occur in two forms: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large number of point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dB(A) for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dB(A) at acoustically "soft" sites.⁶ For example, if a noise source produces a noise level of 89 dB(A) at a reference distance of 50 feet, the noise level would be 83 dB(A) at a distance of 100 feet from the noise source, 77 dB(A) at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dB(A) over hard surfaces and 4.5 dB(A) over soft surfaces for each doubling of distance.

⁵ California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

⁶ Federal Highway Administration, *Highway Noise Fundamentals*, (1980) 97. Examples of "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft, sand, plowed farmland, grass, crops, heavy ground cover, etc.

Table 1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dB(A), Leq)
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, *Noise and Hearing Conservation Technical Manual*, 1999.

Sound levels also can be attenuated by man-made or natural barriers (e.g., sound walls, berms, and ridges), as well as elevational differences. Noise is most audible when traveling by direct line-of-sight, an interrupted visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver, can greatly reduce noise levels from the source since sound can only reach the receiver by diffraction. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Solid walls and berms may reduce noise levels by 5 to 10 dB(A) depending on their height and distance relative to the noise source and the noise receptor.⁷ Sound levels may also be attenuated 3 dB(A) by a first row of houses and 1.5 dB(A) for each additional row of houses.⁸ The minimum noise attenuation provided by typical structures in California is provided in **Table 2, Building Noise Reduction Factors**.

⁷ Federal Highway Administration, *Highway Noise Mitigation*, (1980) 18.

⁸ California Department of Transportation (Caltrans). 2013. Technical Noise Supplement to the Traffic Noise Analysis Protocol. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

Table 2
Building Noise Reduction Factors

Building Type	Window Condition	Noise Reduction Due to Exterior of the Structure (dB(A))
All	Open	10
Light Frame	Ordinary Sash (closed)	20
	Storm Windows	25
Masonry	Single Glazed	25
	Double Glazed	35

Source: Federal Highway Administration, Highway Traffic Noise: Analysis and Abatement Guidance. December 2011.

Sound Rating Scales

Various rating scales approximate the human subjective assessment to the “loudness” or “noisiness” of a sound. Noise metrics have been developed to account for additional parameters, such as duration and cumulative effect of multiple events. Noise metrics are categorized as single event metrics and cumulative metrics, as summarized below.

In order to simplify the measurement and computation of sound loudness levels, frequency weighted networks have obtained wide acceptance. The A-weighted scale, discussed above, has become the most prominent of these scales and is widely used in community noise analysis. Its advantages are that it has shown good correlation with community response and is easily measured. The metrics used in this analysis are all based upon the dB(A) scale.

Equivalent Noise Level

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the “acoustic energy” average noise level during the period of the sample. It is based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dB(A). Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24 hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1 hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community

Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

Community Noise Equivalent Level

Community Noise Equivalent Level (CNEL) is a 24-hour, time-weighted energy average noise level based on the A-weighted decibel. It is a measure of the overall noise experienced during an entire day. The term “time-weighted” refers to the penalties attached to noise events occurring during certain sensitive periods. In the CNEL scale, 5 decibels (dB) are added to measured noise levels occurring between the hours of 7 P.M. and 10 P.M. For measured noise levels occurring between the hours of 10 P.M. and 7 A.M., 10 dB are added. These decibel adjustments are an attempt to account for the higher sensitivity to noise in the evening and nighttime hours and the expected lower ambient noise levels during these periods. Existing and projected future traffic noise levels in this section use the CNEL scale.

Day-Night Average Noise Level

The day-night average sound level (Ldn) is another average noise level over a 24-hour period. Noise levels occurring between the hours of 10 P.M. and 7 A.M. are increased by 10 dB. This noise is weighted to take into account the decrease in community background noise of 10 dB(A) during this period. Noise levels measured using the Ldn scale are typically similar to CNEL measurements.

Adverse Effects of Noise Exposure

Noise is known to have several adverse effects on humans, which has led to laws and standards being set to protect public health and safety, and to ensure compatibility between land uses and activities. Adverse effects of noise on people include hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts on people is briefly discussed in the following narrative.

Hearing Loss

Hearing loss is generally not a community noise concern, even near a major airport or a major freeway. The potential for noise-induced hearing loss is more commonly associated with occupational noise exposures in heavy industry, very noisy work environments with long-term exposure, or certain very loud recreational activities (e.g., target shooting and motorcycle or car racing). The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dB(A) for 8 hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods, even in very noisy neighborhoods, are not sufficiently loud enough to cause hearing loss.

Communication Interference

Communication interference is one of the primary concerns in environmental noise. Communication interference includes speech disturbance and intrusion with activities such as watching television. Noise can also interfere with communications such as within school classrooms. Normal conversational speech is in the range of 60 to 65 dB(A) and any noise in this range or louder may interfere with speech.

Sleep Interference

Noise can make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and cause awakening. Noise may even cause awakening that a person may or may not be able to recall.

Physiological Responses

Physiological responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, and other physical changes. Studies to determine whether exposure to high noise levels can adversely affect human health have concluded that, while a relationship between noise and health effects seems plausible, there is no empirical evidence of the relationship.

Annoyance

Annoyance is an individual characteristic and can vary widely from person to person. Noise that one person considers tolerable can be unbearable to another of equal hearing capability. The level of annoyance depends both on the characteristics of the noise (including loudness, frequency, time, and duration), and how much activity interference (such as speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Attitudes may also be affected by the relationship between the person affected and the source of noise, and whether attempts have been made to abate the noise.

Vibration

Vibration consists of waves transmitted through solid material. Groundborne vibration propagates from a source through the ground to adjacent buildings by surface waves. Vibration may comprise a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating and is measured in hertz (Hz). Most environmental vibrations consist of a composite, or “spectrum” of many frequencies, and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than one Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak

particle velocity (PPV) in inches per second (in/sec) when considering impacts on buildings or other structures, as PPV represents the maximum instantaneous peak of vibration that can stress buildings. Because it is a representation of acute vibration, PPV is often used to measure the temporary impacts of short-term construction activities that could instantaneously damage-built structures. Vibration is often also measured by the root mean squared (RMS) because it best correlates with human perception and response. Specifically, RMS represents “smoothed” vibration levels over an extended period of time and is often used to gauge the long-term chronic impact of a project’s operation on the adjacent environment. RMS amplitude is the average of a signal’s squared amplitude. It is most commonly measured in decibel notation (VdB).

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High frequency vibrations reduce much more rapidly than low frequencies, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss (i.e., the foundation of the structure does not move in sync with the ground vibration), but the vibration can also be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows or items on shelves, or the motion of building surfaces. At high levels, vibration can result in damage to structures.

Manmade groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic induces perceptible vibration in buildings, such as window rattling or shaking of small loose items (typically caused by heavy trucks in passing), then it is most likely an effect of low-frequency airborne noise or ground characteristics. Human annoyance by vibration is related to the number and duration of events. The more events or the greater the duration, the more annoying it will be to humans.

2.2 NOISE SENSITIVE RECEPTORS

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. In addition to the numerous parcels zoned for residential uses in proximity to oil wells throughout the City, there are approximately 766 noise-

sensitive uses within 100 feet of oil wells.⁹ These noise sensitive land uses consist of schools, day cares, elder care facilities, adult residential facilities, parks, and hospitals. Please refer to **Appendix A** to this report for more information related to noise sensitive receptors located in proximity to oil wells.

2.3 EXISTING CONDITIONS

The City is affected by a variety of noise sources, including mobile and stationary sources. Mobile noise in the City is primarily generated by automobiles, trucks, and aircraft such as airplane and helicopter overflight. Motor vehicle noise generally affects numerous receptors along lengths of roadways. Stationary source noise is primarily generated by industrial and commercial land uses; however, all land uses can generate some type of noise.

Oil and gas well operations also contribute to the ambient noise levels at receptors in proximity to active wells. The types of noise associated with oil and gas operations can be complex in nature, due to a wide variety of sources. Some of these noises are intermittent, some are continuous, and many vary in their intensity. Certain sources, such as compressor stations, produce low frequency noise (LFN), which is typically heard as a low rumble. There are also numerous source-dependent and subjective factors that may influence health outcomes, such as noise sensitivity and noise reduction technologies employed at specific locations. While data on noise levels associated with oil and gas development is limited, **Table 3, Noise Levels Associated With Oil and Gas Operations**, identifies estimated noise levels associated with various oil and gas production activities.

⁹ Due to the programmatic nature of this analysis, it is acknowledged that not every noise sensitive receptor will be identified. However, a good-faith effort at identifying the known sensitive receptors has been included in Appendix A to this report. Sensitive receptors within 100 feet of oil wells were selected to conservatively identify a range of noise and vibration levels at locations in proximity to oil wells. As shown in the analysis herein, sensitive receptors located more than 50 feet from oil wells would not experience potentially significant noise and vibration levels during potential abandonment activities.

Table 3
Noise Levels Associated With Oil & Gas Operations

Production/Activity Source	Distance (feet)	Average Noise Levels [dB(A)]
Horizontal Drilling	50	76
Vertical Drilling	100	75-87
Hydraulic Fracturing	250	85-90
Hydraulic Fracturing/Flowback	625	58
Compressor Stations	On-Site	69-86

Source: Science of the Total Environment, Public health implications of environmental noise associated with unconventional oil and gas development, December 9, 2016.

3.0 REGULATORY FRAMEWORK

3.1 REGULATORY FRAMEWORK

There are several plans, regulations, and programs that include policies, requirements, and guidelines regarding noise and vibration at the federal, state, regional, and local levels. As described below, these plans, guidelines, and laws include the following:

- Occupational Safety and Health Act of 1970
- Noise Control Act of 1972
- Federal Transit Administration Vibration Standards
- Office of Planning and Research Guidelines for Noise Compatible Land Use
- Caltrans Vibration/Groundborne Noise Standards
- Los Angeles County Airport Land Use Commission Comprehensive Land Use Plan
- Los Angeles Municipal Code
- City of Los Angeles General Plan Noise Element

Federal

Occupational Safety and Health Act of 1970. Under the Occupational Safety and Health Act of 1970 (29 U.S.C. §1919 et seq.), the Occupational Safety and Health Administration (OSHA) has adopted regulations designed to protect workers against the effects of occupational noise exposure. These regulations list permissible noise level exposure as a function of the amount of time during which the worker is exposed. The regulations further specify a hearing conservation program that involves monitoring noise to which workers are exposed, ensuring that workers are made aware of overexposure to noise, and periodically testing the workers' hearing to detect any degradation.¹⁰

Noise Control Act of 1972. Under the authority of the Noise Control Act of 1972, the United States Environmental Protection Agency (U.S. EPA) established noise emission criteria and testing methods published in Parts 201 through 205 of Title 40 of the Code of Federal Regulations (CFR) that apply to some transportation equipment (e.g., interstate rail carriers, medium trucks, and heavy trucks) and construction equipment. In 1974, U.S. EPA issued guidance levels for the protection of public health and welfare in

¹⁰ United States Department of Labor. OSH Act of 1970. <https://www.osha.gov/laws-regs/oshact/completeoshact>. Accessed May, 2021.

residential areas of an outdoor L_{dn} of 55 dBA and an indoor L_{dn} of 45 dBA. These guidance levels are not standards or regulations and were developed without consideration of technical or economic feasibility. There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. Moreover, the federal noise standards are not reflective of urban environments that range by land use, density, proximity to commercial or industrial centers, etc. As such, for purposes of determining acceptable sound levels to determine and evaluate intrusive noise sources and increases, this document utilizes the City of Los Angeles Noise Regulations, discussed below.

Federal Transit Administration Vibration Standards. There are no federal vibration standards or regulations adopted by any agency that are applicable to evaluating vibration impacts from activities associated with the Project. However, the Federal Transit Administration (FTA) has adopted vibration criteria for use in evaluating vibration impacts from construction activities. The vibration damage criteria adopted by the FTA are shown in **Table 4, Construction Vibration Damage Criteria**.

Table 4
Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

The FTA has also adopted standards associated with human annoyance for determining the groundborne vibration and noise impacts from ground-borne noise on the following three off-site land-use categories: Vibration Category 1 – High Sensitivity, Vibration Category 2 – Residential, and Vibration Category 3 – Institutional.¹¹ The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other

¹¹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, Table 6-1, page 124, 2018.

institutions, and quiet offices that do not have vibration-sensitive equipment but that still potentially involve activities that could be disturbed by vibration. The vibration thresholds associated with human annoyance for these three land-use categories are shown in **Table 5, Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment**. No thresholds have been adopted or recommended for commercial or office uses.

Table 5
Groundborne Vibration and Groundborne Noise Impact Criteria for General Assessment

Land Use Category	Frequent Events ^a	Occasional Events ^b	Infrequent Events ^c
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB ^d	65 VdB ^d	65 VdB ^d
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB

^a "Frequent Events" is defined as more than 70 vibration events of the same source per day.

^b "Occasional Events" is defined as between 30 and 70 vibration events of the same source per day.

^c "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.

^d This criterion is based on levels that are acceptable for most moderately sensitive equipment such as optical microscopes.

Source: FTA, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

State

Office of Planning and Research Guidelines for Noise Compatible Land Use. The State of California has not adopted statewide standards for environmental noise, but the Governor's Office of Planning and Research (OPR) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. The City has developed its own compatibility guidelines in the Noise Element of the General Plan based in part on OPR Guidelines, see **Table 7, Guidelines for Noise Compatible Land Use (CNEL)** later in this report. California Government Code Section 65302 requires each county and city in the State to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(f) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community; (2) recognize Office of Noise Control guidelines; and (3) analyze and quantify current and projected noise levels.

Caltrans Vibration/Groundborne Noise Standards. The State of California has not adopted Statewide standards or regulations for evaluating vibration or groundborne noise impacts from land use

development projects. Although the State has not adopted any vibration standard, Caltrans recommends the following vibration thresholds that are more practical than those provided by the FTA.¹²

The state noise and vibration guidelines are to be used as guidance with respect to planning for noise, not standards and/or regulations to which the City of Los Angeles must adhere.

Table 6
Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (inch/sec)	
	Transient Sources ¹	Continuous/Frequent Intermittent Sources ²
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

Source: Table 19, *Transportation and Construction Vibration Guidance Manual* (Caltrans 2020).

1 Transient sources create a single, isolated vibration event, such as blasting or drop balls.

2 Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Local

Los Angeles Municipal Code. The City of Los Angeles Noise Regulations are provided in Chapter XI of the Los Angeles Municipal Code (LAMC). LAMC Section 111.02 provides procedures and criteria for the measurement of the sound level of “offending” noise sources. In accordance with the LAMC, a noise source that causes a noise level increase of 5 dBA over the existing average ambient noise level as measured at an adjacent property line creates a noise violation. This standard applies to radios, television sets, air conditioning, refrigeration, heating, pumping and filtering equipment, powered equipment intended for repetitive use in residential areas, and motor vehicles driven on-site. To account for people’s increased tolerance for short-duration noise events, the Noise Regulations provide a 5 dBA allowance for a noise

¹² Caltrans, *Transportation and Construction Vibration Guidance Manual*, 2020.

source that causes noise lasting more than 5 but less than 15 minutes in any one-hour period, and an additional 5 dBA allowance (for a total of 10 dBA) for a noise source that causes noise lasting 5 minutes or less in any one-hour period.¹³

The LAMC provides that in cases where the actual ambient conditions are not known, the City's presumed daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) minimum ambient noise levels as defined in LAMC Section 111.03 should be used. The presumed ambient noise levels for these areas where the actual ambient conditions are not known as set forth in the LAMC Sections 111.03 are provided in **Table 7, City of Los Angeles Presumed Ambient Noise Levels**. For example, for residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime.

Table 7
City of Los Angeles Presumed Ambient Noise Levels

Zone	Daytime Hours (7 A.M. to 10 P.M.) dBA (L _{eq})	Nighttime Hours (10 P.M. to 7 A.M.) dBA (L _{eq})
Residential (A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5)	50	40
Commercial (P, PB, CR, C1, C1.5, C2, C4, C5, and CM)	60	55
Manufacturing (M1, MR1 and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Source: LAMC Section 111.03.

LAMC Section 112.02 limits increases in noise levels from air conditioning, refrigeration, heating, pumping and filtering equipment. Such equipment may not be operated in such manner as to create any noise which would cause the noise level on the premises of any other occupied property, or, if a condominium, apartment house, duplex, or attached business, within any adjoining unit, to exceed the ambient noise level by more than 5 dB.

LAMC Section 112.04 prohibits the operation of any lawn mower, backpack blower, lawn edger, riding tractor, or any other machinery equipment, or other mechanical or electrical device, or any hand tool that creates a loud, raucous or impulsive sound, within any residential zone or within 500 feet of any residence between 10:00 PM and 7:00 AM. Section 113.01 prohibits rubbish and garbage collection within 200 feet of any residence between 9:00 PM and 6:00 AM.

¹³ Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

LAMC Section 112.05 sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard shall not apply where compliance therewith is technically infeasible. Specifically, such activities may be allowed when it is demonstrated that compliance is not possible “despite the use of mufflers, shields, sound barriers, and/or other noise reduction device or techniques during the operation of the equipment.”¹⁴

LAMC Section 41.40 prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. to 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). In general, the City’s Department of Building and Safety enforces Noise Ordinance provisions relative to equipment and the Los Angeles Police Department (LAPD) enforces provisions relative to noise generated by people.

LAMC Section 113.01 prohibits collecting or disposing of rubbish or garbage, operating any refuse disposal truck, or collecting, loading, picking up, transferring, unloading, dumping, discarding, or disposing of any rubbish or garbage, as such terms are defined in LAMC Section 66.00, within 200 feet of any residential building between the hours of 9:00 p.m. and 6:00 a.m. of the following day, unless a permit therefore has been duly obtained beforehand from the Board of Police Commissioners.

LAMC Section 114.03 prohibits the loading or unloading of any vehicle, operation of any dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residence between 10:00 PM and 7:00 AM.

LAMC Section 91.1206 establishes noise insulation performance standards to protect persons within new hotels, motels, dormitories, residential care facilities, apartment houses, dwellings, private schools, and places of worship from the effects of excessive noise, including but not limited to, hearing loss or impairment and interference with speech and sleep. According to Subsection 91.1206.14.1, these structures shall be designed to prevent the intrusion of exterior noise beyond prescribed levels when located in noise critical areas, such as proximity to highways, country roads, city streets, railroads, airports, and commercial or industrial areas. Proper design shall include, but shall not be limited to, orientation of the structure, setbacks, shielding, and sound insulation of the building itself. Specifically, Subsection 91.1206.14.2 limits interior noise levels attributable to exterior sources to 45 dBA L_{dn} or CNEL in any habitable room. Worst-case noise levels, either existing or future, are to be used as the basis for determining compliance with this requirement. Future noise levels are to be predicted for a period of at least ten years from the time of building permit application. Furthermore, according to Subsection 91.1206.14.3, structures identified under

¹⁴ Los Angeles Municipal Code Chapter XI-Noise Regulation (Section 112.05).

Subsection 91.1206.1 that are exposed to airport noise greater than 60 dBA L_{dn} or CNEL, shall require an acoustical analysis showing that the proposed design will achieve the allowable interior noise level.

Section 91.1207.14.2 prohibits interior noise levels attributable to exterior sources from exceeding 45 dBA in any habitable room. The noise metric shall be either the day-night average sound level (L_{dn}) or the CNEL, consistent with the noise element of the local general plan.

City of Los Angeles General Plan Noise Element. The Noise Element of the City's General Plan policies include the CNEL guidelines for land use compatibility as shown in **Table 8, Guidelines for Noise Compatible Land Use (CNEL)**, and includes a number of goals, objectives, and policies for land use planning purposes. The overall purpose of the Noise Element is to guide policymakers in making land use determinations and in preparing noise ordinances that would limit exposure of citizens to excessive noise levels.¹⁵ The following policies and objectives from the Noise Element apply to the Project.

Objective 2: **Non-Airport.** Reduce or eliminate non-airport related intrusive noise, especially relative to noise sensitive uses.

Policy 2.2: Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise and alleviate noise that is deemed a public nuisance.

The Noise Element of the City's General Plan policies include the CNEL guidelines for land use compatibility, as shown in **Table 8**. The Noise Element also addresses noise mitigation regulations, strategies, and programs, and delineates the authority of federal, State, and City bodies in regulating automotive, rail, aircraft, and nuisance noise. The Noise Element does not include any mandatory standards for land use planning or quantitative thresholds for construction or operational groundborne vibration.

¹⁵ City of Los Angeles. General Plan, Noise Element adopted February 3, 1999. Pages 1.1-2.4. [https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise Element.pdf](https://planning.lacity.org/odocument/b49a8631-19b2-4477-8c7f-08b48093cddd/Noise%20Element.pdf). Accessed May, 2021.

Table 8
Guidelines for Noise Compatible Land Use (CNEL)

Land Use Category	Normally Acceptable¹	Conditionally Acceptable²	Normally Unacceptable³	Clearly Unacceptable⁴
Residential Single-Family, Duplex, Mobile Homes	50-55	55-70	70-75	Above 75
Residential Multi-Family Homes	50-60	60-70	70-75	Above 75
Transient Lodging – Motels, Hotels	50-60	60-70	70-80	Above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50-60	60-70	70-80	Above 80
Auditoriums, Concert Halls, Amphitheaters	--	50-65	--	Above 65
Sports Arenas, Outdoor Spectator Sports	--	50-70	--	Above 70
Playgrounds, Neighborhood Parks	50-65	--	65-75	Above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50-70	--	70-80	Above 80
Office Buildings, Business and Professional Commercial	50-65	65-75	Above 75	--
Agriculture, Industrial, Manufacturing, Utilities	50-70	70-75	Above 75	--

¹ Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

² New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

³ New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

⁴ New construction or development should generally not be undertaken.

Source: Los Angeles 1999

4.0 NOISE & VIBRATION ANALYSIS

4.1 THRESHOLDS OF SIGNIFICANCE

The impacts of the Ordinance related to noise and vibration would be considered significant if they would exceed any of the following Thresholds of Significance, in accordance with Appendix G of the *California Environmental Quality Act (CEQA) Guidelines*:

- Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project Site in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Generation of excessive ground-borne vibration or ground-borne noise levels; and
- For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels.

4.2 METHODOLOGY

Although not regulated by the Ordinance, well abandonment is a reasonably foreseeable outcome for many of the wells currently operating in the City, although as stated previously, no specific timeline for abandonment currently exists and the Ordinance does not include any regulations related to the timing of the abandonment of oil wells. As such, for purposes of this analysis, there are two distinct phases that would have the potential to change ambient noise levels at locations in proximity to oil and gas wells throughout the City: 1) Short-term and temporary abandonment related activities, and 2) Long-term changes to noise levels attributable to the cessation of oil and gas production and operations.

Noise levels associated with short-term and temporary abandonment related activities were calculated using the FHWA Roadway Construction Noise Model (RCNM). Because these noise levels would be short-term and temporary and most closely resemble construction activities, they have been compared to the construction noise level standards identified in the City's Noise Ordinance (see LAMC Sections 112.05 and 41.40). Long-term changes to noise levels attributable to the cessation of oil and gas production and operations have been characterized quantitatively and qualitatively and have been compared to the City's Noise Ordinance and Noise Element as appropriate.

4.3 IMPACT ANALYSIS

Impact NOI-1 **Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? (*Less than Significant With Mitigation*).**

Short-Term and Temporary Noise

The closure of oil and gas wells entails plugging the wells in place in accordance with California Statutes and Regulations and all other applicable requirements as overseen by CalGEM. The process of well abandonment will be determined on a case-by-case basis under the regulatory supervision of CalGEM and the LAFD and will depend on individual site conditions such as type and depth of well. However, for the purposes of this environmental analysis, several generalized assumptions have been made based upon standard industry practice, existing regulations governing well abandonment, and case studies. While plugging and abandonment varies by well, there is a consistent set of procedures that are followed. Generally, the drill site's existing drilling or maintenance rig will be used to abandon the well and remove equipment from the well.¹⁶ Well equipment will be removed from the site by truck. Cement trucks will also arrive onsite to fill the well at various depths over a span of several days. An operator may use in excess of 2,500 cubic feet of cement for one abandonment. The process entails removing equipment and filling the well with cement at different phases in order to ensure that it is safe to abandon the well at varying depths. At the end of each work day, the well site is closed and the rig is shut down in order to resume operations the following work day. See **Section 1.2, Project Description**, for the anticipated steps of well abandonment.

For purposes of estimating potential noise and vibration levels associated with abandonment activities, it is assumed each well abandonment would last approximately two weeks (i.e., 10 workdays), and on-site equipment would include one workover rig, one cement pump truck, one welder, and one tractor/loader/backhoe. This analysis conservatively assumes that all pieces of equipment would operate concurrently, presenting a worst-case impact scenario.

FHWA's RCNM has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities. With the use of the RCNM, as detailed in **Appendix B** to this report, the short-term and temporary noise levels associated with abandonment activities are presented in **Table 9, Temporary Noise Levels During Well Abandonment - Unmitigated**.

¹⁶ When a drilling or maintenance rig is not on the well site, a rig will need to be brought to the site to complete the abandonment process.

As shown in **Table 9**, noise levels were estimated at distances of up to 50 feet, 75 feet and 100 feet to characterize potential noise levels that may be experienced at sensitive receptors located in proximity to oil and gas wells throughout the City. Noise levels would diminish notably with distance from the site at a rate of 6 dB(A) per doubling of distance (noise from stationary or point sources is reduced by about 6 dB(A) for every doubling of distance at acoustically hard locations). For example, a noise level of 86 dB(A) Leq measured at 50 feet from the noise source to the receptor would decline to 80 dB(A) Leq at 100 feet from the source to the receptor and fall by another 6 dB(A) Leq to 74 dB(A) Leq at 200 feet from the source to the receptor. These noise attenuation rates assume a flat and unobstructed distance between the noise generator and the receptor. Intervening structures and vegetation would further attenuate (reduce) the noise. Furthermore, it should be noted that increases in noise levels at sensitive receptors during abandonment would be intermittent and temporary and would not generate continuously high noise levels.

Table 9
Temporary Noise Levels During Well Abandonment - Unmitigated

Sensitive Receptor Location	Distance to Well (feet)	Estimated Temporary Noise Levels [dB(A)]	Exceed LAMC Standards?
1. Sensitive Receptors at 50 Feet	50	79	Yes
2. Sensitive Receptors at 75 Feet	75	75	No
3. Sensitive Receptors at 100 Feet	100	73	No

*Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this report.*

Short-term and temporary impacts would be potentially significant if, as indicated in LAMC Section 112.05, noise from construction equipment within 500 feet of a residential zone exceeds 75 A-weighted decibels (dBA) at a distance of 50 feet from the noise source. Although not required in the LAMC, this analysis also applies this LAMC standard for non-residentially zoned sensitive receptors located in proximity to oil and gas wells throughout the City. It should also be noted that the LAMC noise limitation does not apply where compliance is technically infeasible. Technically infeasible means that the above noise limitation cannot be complied with despite the use of mufflers, shields, sound barriers and/or any other noise reduction device or techniques during the operation of the equipment. As shown in **Table 9**, the estimated unmitigated temporary noise levels could exceed the 75 dBA noise standard at distances of up to 50 feet from the source, and unmitigated noise levels would not exceed the 75 dBA noise standard at distances of up to 75 feet and 100 feet from the source. As noise levels would diminish with distance from the source, unmitigated noise levels at distances beyond 100 feet from the source would not have the potential to exceed the noise

standard. Nevertheless, as the estimated unmitigated temporary noise levels could exceed the 75 dBA noise standard at distances of up to 50 feet from the source, this impact is considered potentially significant.

Mitigation Measures

MM NOI-1: Where well abandonment activities occur within 50 feet of the following sensitive receptors: schools, day cares, elder care facilities, adult residential facilities, parks, hospitals, or residences, flexible sound control curtains shall be erected between the noise-producing equipment and the sensitive receptors, blocking the line-of-sight between the sources and receptors. The sound control curtain materials shall meet a minimum Sound Transmission Class (STC) 20 rating, capable of reducing equipment noise by at least 5 dBA.

Level of Significance After Mitigation

The use of flexible sound control curtains, as required in **Mitigation Measure NOI-1**, would be feasible and effective at reducing short-term and temporary noise levels at sensitive receptors located within 50 feet of well abandonment activities. The STC-20 rating identified in **Mitigation Measure NOI-1** requires the sound control curtain material to have a transmission loss (TL) value of 20 dB. TL is defined as the loss in sound energy, expressed in decibels, as sound passes through a barrier or a wall.¹⁷ According to FHWA Noise Barrier Design Handbook, the design feasibility of a sound barrier that reduces noise by 5 dBA is considered “simple” and a reduction of up to 10 dBA as “attainable.”¹⁸ Thus, the data suggests that **Mitigation Measure NOI-1** could reduce noise levels by up to 10 to 20 dBA. However, this analysis conservatively assumes that a 5 dBA reduction would be achieved with the implementation of **Mitigation Measure NOI-1**. As shown in **Table 10, Temporary Noise Levels During Well Abandonment - Mitigated**, **Mitigation Measure NOI-1** would ensure temporary noise levels would not exceed the LAMC standard of 75 dBA at 50 feet from the source.

Other noise best practices would be implemented during the abandonment process. These best practices would also help to reduce temporary noise levels in accordance with LAMC Section 112.05. For example, abandonment activities would be scheduled so as to avoid operating several pieces of equipment simultaneously (as feasible), which causes high noise levels. Further, noise and groundborne vibration activities whose specific location on or near the site are flexible (e.g., stationary equipment and truck idling) will be conducted as far as possible from the nearest noise- and vibration-sensitive land uses. However, given the fluid dynamics likely to occur during the abandonment processes, this analysis conservatively does not take any quantified reduction associated with these techniques. Additionally, all abandonment

¹⁷ FHWA Noise Barrier Design Handbook, Terminology, July 14, 2011.

¹⁸ FHWA Noise Barrier Design Handbook, Table 4, July 14, 2011.

activities that occur as a result of the Ordinance would be conducted in accordance with LAMC Section 41.40, which prohibits construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday (i.e., construction is allowed Monday through Friday between 7:00 a.m. to 9:00 p.m.; and Saturdays and National Holidays between 8:00 a.m. to 6:00 p.m.). Thus, all activities generating temporary noise levels would be limited to the less noise-sensitive daytime hours. Based on these reasons, and with the implementation of **Mitigation Measure NOI-1**, the Ordinance would not result in the generation of a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance. As such, temporary noise impacts would be *less than significant*.

Table 10
Temporary Noise Levels During Well Abandonment - Mitigated

Sensitive Receptor Location	Distance to Well (feet)	Estimated Temporary Noise Levels [dB(A)]	Exceed LAMC Standards?
1. Sensitive Receptors at 50 Feet	50	74	No
2. Sensitive Receptors at 75 Feet	75	70	No
3. Sensitive Receptors at 100 Feet	100	68	No

Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this report.

Long-Term Noise

As discussed previously, existing oil and gas well operations contribute to the ambient noise levels at receptors in proximity to active wells and throughout the City as a whole. The types of noise associated with oil and gas operations can be complex in nature, due to a wide variety of sources. Some of these noises are intermittent, some are continuous, and many vary in their intensity. Certain sources, such as compressor stations, produce low frequency noise (LFN), which is typically heard as a low rumble. There are also numerous source-dependent and subjective factors that may influence health outcomes, such as noise sensitivity and noise reduction technologies employed at specific locations. As shown previously in **Table 3**, average noise levels from oil and gas production activities range from approximately 58 dBA to 90 dBA, depending on the activity and setback distances. In addition to these noise sources, other existing noise sources associated with well operations throughout the City include operator worker trips (i.e., motor vehicle noise) to and from well locations, and well maintenance related activities (i.e., fire clearance per LAFD and operations maintenance/inspections per CalGEM and other agency requirements). Upon full implementation of the Ordinance, noise sources associated with oil and gas production would be removed within the City, and long-term noise levels would likely be decreased compared to existing noise levels

associated with oil and gas production. As such, the Ordinance would not result in the generation of a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, and long-term noise impacts would be *less than significant*.

Impact NOI-2 Would the project result in the generation of excessive groundborne vibration or groundborne noise levels? (*Less than Significant*).

Similar to the short-term and temporary noise discussion provided above, activities associated with well abandonment also have the potential to generate short-term and temporary groundborne vibration levels at sensitive receptors located in proximity to the wells. Based on the parameters described previously and guidance from the FTA's *Transit Noise and Vibration Impact Assessment Manual*,¹⁹ groundborne vibration levels associated with abandonment activities are presented in **Table 11, Temporary Vibration Levels During Well Abandonment**. As shown in **Table 11**, groundborne vibration levels were estimated at distances of up to 50 feet, 75 feet and 100 feet to characterize potential vibration levels that may be experienced at sensitive receptors located in proximity to oil and gas wells throughout the City. **Table 11** illustrates that short-term and temporary vibration levels would not have the potential to exceed Caltrans' standards for building damage (PPV) or the FTA's standards for human annoyance (VdB). As such, the Ordinance would not result in the generation of excessive groundborne vibration levels, and these impacts would be *less than significant*.

Table 11
Temporary Vibration Levels During Well Abandonment

Sensitive Receptor Location	Distance to Well (feet)	Vibration Standards PPV/VdB ^a	Estimated Vibration Levels PPV/VdB
1. Sensitive Receptors at 50 Feet	50	0.25/80	0.03/78
2. Sensitive Receptors at 75 Feet	75	0.25/80	0.02/73
3. Sensitive Receptors at 100 Feet	100	0.25/80	0.01/69

^aThe vibration standards applied are based on the FTA and Caltrans standards provided previously in Tables 5 and 6 herein. Source: Impact Sciences, Inc., September 2022. See **Appendix B** to this report.

¹⁹ Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual. Available at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. See Appendix B to this report for vibration calculations.

Impact NOI-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the Project area to excessive noise levels? (No Impact).

Three airports are located within the City of Los Angeles: two public and one general aviation. Respectively, they are: Los Angeles International (LAX) and Van Nuys, and Whiteman Airport. There are three inactive plugged wells located within one mile of LAX. As these wells are plugged (i.e., no oil and gas extraction occurring), there would be no changes to the existing conditions at these locations. Thus, the Ordinance would not expose people residing or working in the area of oil wells to excessive noise levels associated with a private airstrip or public use airport. No impact would occur.

5.0 REFERENCES

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FHWA Noise Barrier Design Handbook, Table 4, July 14, 2011.

FHWA Noise Barrier Design Handbook, Terminology, July 14, 2011

Los Angeles County Department of Public Health, *Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County*, 2018, Available at: http://publichealth.lacounty.gov/eh/docs/PH_OilGasFacilitiesPHSafetyRisks.pdf

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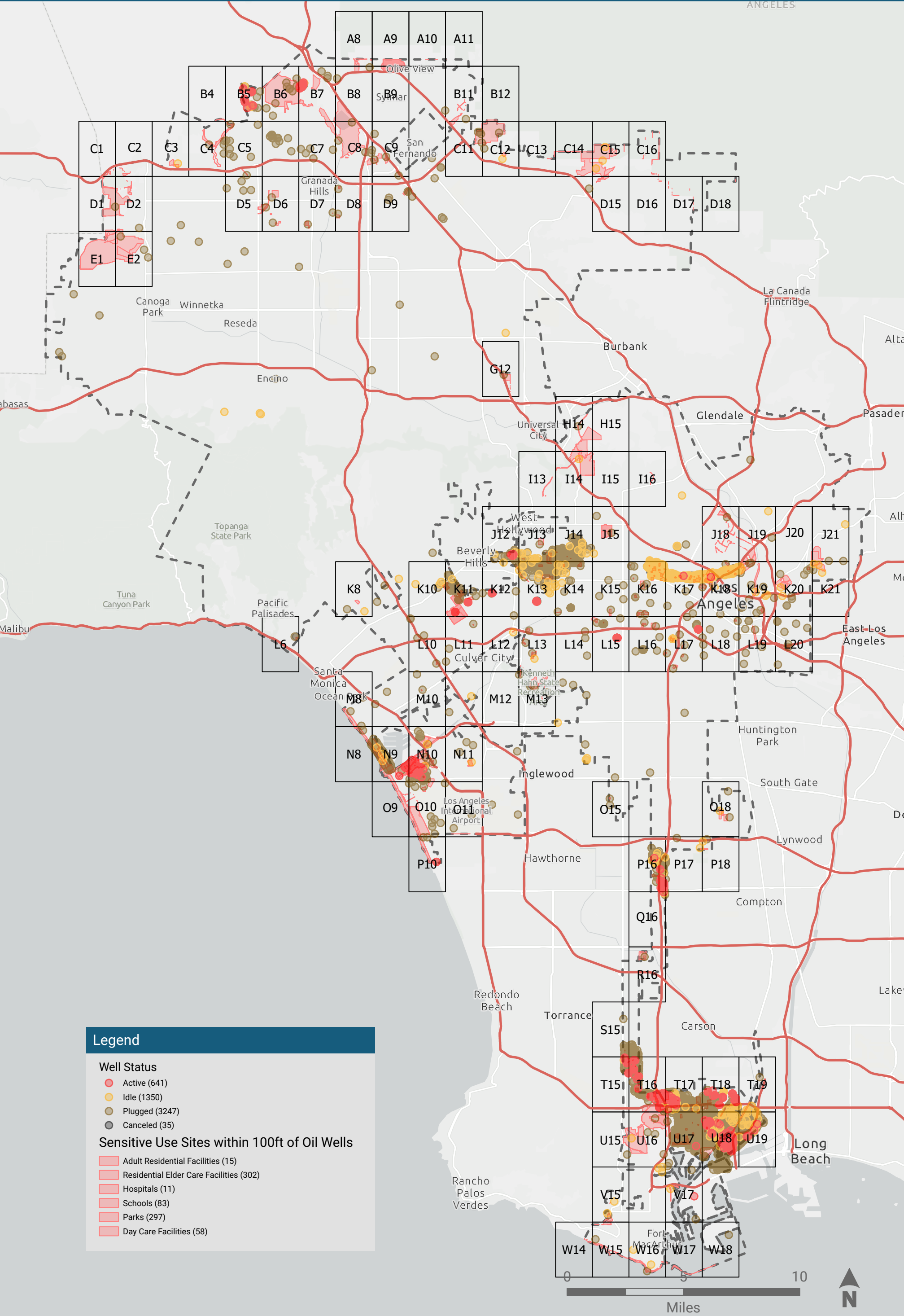
APPENDIX A

Sensitive Receptors

City of Los Angeles Oil Well Locations

Sensitive Use Sites Within 100 Feet of Oil Wells

DRAFT



Legend

Well Status

Active (641)

Idle (1350)

Plugged (3247)

Canceled (35)

Sensitive Use Sites within 100ft of Oil Wells

Adult Residential Facilities (15)

Residential Elder Care Facilities (302)

Hospitals (11)

Schools (83)

Parks (297)

Day Care Facilities (58)

APPENDIX B

Noise & Vibration Data



L.A. Oil and Gas Ordinance Construction Noise Summary

Model Run Date: 08/19/2022

Receptor #1 – Reference at 50 feet

Equipment	Quantity	Noise Level at 50 Feet (dBA L_{max})	Estimated Usage Factor (%)	Distance to Receptor (ft)
Drill Rig Truck	1	79.1	20	50
Concrete Pump Truck	1	81.4	20	50
Welder/Torch	1	74.0	40	50
Backhoe	1	77.6	40	50

1-Hour Leq: 79 dBA

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 8/19/2022

Case Description: L.A. Oil & Gas Construction Noise

---- Receptor #1 ----

Description

Reference receptor at 50 feet

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)	Estimated Shielding (dBA)
			Spec Lmax (dBA)	Actual Lmax (dBA)		
Drill Rig Truck	No	20		79.1	50	0
Concrete Pump Truck	No	20		81.4	50	0
Welder / Torch	No	40		74	50	0
Backhoe	No	40		77.6	50	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Drill Rig Truck	79.1	72.2
Concrete Pump Truck	81.4	74.4
Welder / Torch	74	70
Backhoe	77.6	73.6
Total	81.4	78.9

*Calculated Lmax is the Loudest value.



Receptor #2 – Reference at 75 feet

Equipment	Quantity	Noise Level at 50 Feet (dBA L_{max})	Estimated Usage Factor (%)	Distance to Receptor (ft)
Drill Rig Truck	1	79.1	20	75
Concrete Pump Truck	1	81.4	20	75
Welder/Torch	1	74.0	40	75
Backhoe	1	77.6	40	75

1-Hour Leq: 75 dBA

Roadway Construction Noise Model (RCNM), Version 1.1

Report date: 8/19/2022

Case Description L.A. Oil & Gas Construction Noise

---- Receptor #2 ----

Description

Reference receptor at 75 feet

Description	Impact Device	Usage(%)	Equipment Spec	Actual	Receptor	Estimated
			Lmax (dBA)	Lmax (dBA)	Distance (feet)	Shielding (dBA)
Drill Rig Truck	No	20		79.1	75	0
Concrete Pump Truck	No	20		81.4	75	0
Welder / Torch	No	40		74	75	0
Backhoe	No	40		77.6	75	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Drill Rig Truck	75.6	68.6
Concrete Pump Truck	77.9	70.9
Welder / Torch	70.5	66.5
Backhoe	74	70.1
Total	77.9	75.0

*Calculated Lmax is the Loudest value.



Receptor #3 – Reference at 100 feet

Equipment	Quantity	Noise Level at 50 Feet (dBA L_{max})	Estimated Usage Factor (%)	Distance to Receptor (ft)
Drill Rig Truck	1	79.1	20	100
Concrete Pump Truck	1	81.4	20	100
Welder/Torch	1	74.0	40	100
Backhoe	1	77.6	40	100

1-Hour Leq: 73 dBA

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 8/19/2022

Case Description: L.A. Oil & Gas Construction Noise

---- Receptor #3 ----

Description

Reference receptor at 100 feet

Description	Impact Device	Usage(%)	Equipment		Receptor Distance (feet)	Estimated Shielding (dBA)
			Spec Lmax (dBA)	Actual Lmax (dBA)		
Drill Rig Truck	No	20		79.1	100	0
Concrete Pump Truck	No	20		81.4	100	0
Welder / Torch	No	40		74	100	0
Backhoe	No	40		77.6	100	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Drill Rig Truck	73.1	66.1
Concrete Pump Truck	75.4	68.4
Welder / Torch	68	64
Backhoe	71.5	67.6
Total	75.4	72.8

*Calculated Lmax is the Loudest value.



Vibration Impact Summary

Receptor	PPV (in./sec.)	VdB
Receptor #1 – Reference at 50 ft.	0.031	78
Receptor #2 – Reference at 75 ft.	0.017	73
Receptor #3 – Reference at 100 ft.	0.011	69

L.A. Oil & Gas Ordinance		Reference at 50 ft.
Ref=	Reference vibration level (PPV)	
RefD=	Reference distance for Reference vibration level (Feet)	
Vibration PPV		
Ref=	0.089	Based on type of equipment
RefD=	25	
D=	50	Distance from equipment to sensitive receptor
Equip=	0.031	
Annoyance VdB		
Ref=	87	Based on type of equipment
RefD=	25	
D=	50	Distance from equipment to sensitive receptor
Equip=	78	
Peak demolition vibration based on utilizing a large bulldozer.		
Source: FTA Tranist Noise and Vibration Impact Assessment, 2006.		

L.A. Oil & Gas Ordinance

Reference at 75 ft.

Ref= Reference vibration level (PPV)

RefD= Reference distance for Reference vibration level (Feet)

Vibration PPV

Ref= 0.089 Based on type of equipment

RefD= 25

D= 75 Distance from equipment to sensitive receptor

Equip= 0.017

Annoyance VdB

Ref= 87 Based on type of equipment

RefD= 25

D= 75 Distance from equipment to sensitive receptor

Equip= 73

Peak demolition vibration based on utilizing a large bulldozer.

Source: FTA Tranist Noise and Vibration Impact Assessment, 2006.

L.A. Oil & Gas Ordinance		Reference at 100 ft.
Ref=	Reference vibration level (PPV)	
RefD=	Reference distance for Reference vibration level (Feet)	
Vibration PPV		
Ref=	0.089	Based on type of equipment
RefD=	25	
D=	100	Distance from equipment to sensitive receptor
Equip=	0.011	
Annoyance VdB		
Ref=	87	Based on type of equipment
RefD=	25	
D=	100	Distance from equipment to sensitive receptor
Equip=	69	
Peak demolition vibration based on utilizing a large bulldozer.		
Source: FTA Tranist Noise and Vibration Impact Assessment, 2006.		

MITIGATION & MONITORING PROGRAM

A. INTRODUCTION

This Mitigation and Monitoring Program (“MMP”) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” In addition, Section 15097(a) of the *State CEQA Guidelines* requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the *CEQA Guidelines*.

The City of Los Angeles is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

An Initial Study (IS) / Mitigated Negative Declaration (MND) has been prepared to address the potential environmental impacts of the Project. The evaluation of the Project’s impacts takes into consideration project design features and identifies mitigation measures to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor implementation of the mitigation measures identified for the Project.

B. ORGANIZATION

As shown on the following pages, each required mitigation measure for the Project is listed and categorized by impact area, with an accompanying identification of the following:

- **The Implementing Agency:** Implementing agency may include the Department of City Planning (DCP), Los Angeles Department of Building and Safety, Los Angeles

Fire Department and/or City Council.

- **Enforcement Agency and Monitoring Agency:** The agency or agencies that will monitor the measure and ensure that it is implemented in accordance with this MMP;
- **Monitoring Phase/Monitoring Action:** The criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

All agencies and departments are in the City of Los Angeles, unless otherwise noted. The implementing, enforcement and monitoring agencies, have authority to determine the applicability and compliance of all mitigation measures in their reasonable discretion.

C. PROGRAM MODIFICATION

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the Project as identified in the Mitigated Negative Declaration. The MMP for the Project will be in place through the lifetime of the ordinance (approximately 20 years) or until all well drilling in the City has ceased, whichever is first. DCP and other City Departments (e.g., Department of Building and Safety) shall be responsible for administering the MMP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety [DBS], Department of Public Works [DPW], etc.), consultants, or contractors. The City may choose to designate one or more environmental monitor(s) (e.g. City building inspector, project contractor, certified professionals, etc., depending on the requirements of the mitigation measures).

In implementing mitigation measures, the standard shall be waived by the City Planning Director or his or her designee where the mitigation measure is found based on substantial evidence to be no longer necessary for the purpose of which it was adopted (e.g., another regulatory agency requires an equal or more effective requirement, the City has adopted equally or more effective regulations that are applicable; or the particulars of the subsequent action makes the standard unnecessary to address the impact intended to be mitigated; new technology has made the standard unnecessary to mitigate the impact). Similarly, as this is a long-term Project and technology and circumstances may change over the next 20 years that may make the mitigation measures in this MMP unnecessary or impossible, for all mitigation measures in the MMP, mitigation measures

may be waived or not enforced if consistent with the requirements of CEQA (statute, guidelines and case law).

D. MITIGATION MONITORING PROGRAM

Hazards and Hazardous Materials

Mitigation Measure

HAZ-1: For well sites in which the abandonment process requires grading and are:

- Located on or within 500 feet of a Hazardous Materials site listed in any of the following databases:

State Water Resources Control Board GeoTracker (refer to <https://geotracker.waterboards.ca.gov>);

DTSC EnviroStor (refer to <https://www.envirostor.dtsc.ca.gov/public>);

DTSC Hazardous Waste Tracking System (refer to <https://hwts.dtsc.ca.gov>);

LAFD Certified Unified Program Agency (refer to the active, inactive, and historical inventory lists at <https://www.lafd.org/fire-prevention/cupa/public-records>);

Los Angeles County Fire Department Health Hazardous Materials Division (refer to the active and inactive facilities, site mitigation, and California Accidental Release Prevention inventory lists at <https://fire.lacounty.gov/public-records-requests>);

SCAQMD Facility Information Detail (refer to <https://xappprod.aqmd.gov/find>); or

- Located on or within 500 feet of a Hazardous Materials site designated as a Resource Conservation and Recovery Act (RCRA) Small Quantity Generator or Large Quantity Generator (refer to the U.S. EPA Envirofacts database at <https://enviro.epa.gov/index.html>);

And:

The site has not been previously remediated to the satisfaction of the relevant regulatory agency/agencies for any contamination associated with the above uses or site conditions.

Then a Phase I Environmental Site Assessment shall be prepared by a Qualified Environmental Professional in accordance with State standards/guidelines and current professional standards, including the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments, to evaluate whether the site, or the surrounding area, is contaminated with hazardous substances from any past or current land uses, including contamination related to the storage, transport, generation, or disposal of toxic or Hazardous Waste or materials.

If the Phase I identifies a Recognized Environmental Condition (REC) and/or if recommended in the Phase I, a Phase II Environmental Site Assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or Phase II Environmental Site Assessment(s) shall be maintained pursuant to appropriate proof of compliance and made available for review and inclusion in the administrative record by the appropriate regulatory agency, such as the State Water Resources Control Board, the State Department of Toxic Substances Control, or the LAFD Hazard Mitigation Program. Any remediation plan recommended in the Phase II Environmental Site Assessment or by the appropriate regulatory agency to ensure the abandonment process does not exacerbate existing identified hazardous conditions shall be implemented and, if required, a No Further Action letter, or equivalent, shall be issued by the appropriate regulatory agency prior to issuance of any permit from LADBS, unless the regulating agency determines that remedial action can be implemented in conjunction with excavation and/or grading. If oversight or approval by a regulatory agency is not required, the Qualified Environmental Professional shall provide written verification of compliance with and completion of the remediation plan, such that the site meets the applicable standards for the proposed use, which shall be

maintained pursuant to appropriate proof of compliance requirements.

Implementing Agency: DCP

Enforcement Agency: Los Angeles Fire Department

Monitoring Phase/Monitoring Actions: as oil wells are proposed for abandonment

Action Indicating Compliance: Preparation of Phase I Environmental Site Assessment, investigation by REA and remediation; further studies and remediation as necessary by qualified contractors

Noise

Mitigation Measure

MM NOI-1: Where well abandonment activities occur within 50 feet of the following sensitive receptors: schools, day cares, elder care facilities, adult residential facilities, parks, and hospitals, or residences, flexible sound control curtains shall be erected between the noise-producing equipment and the sensitive receptors, blocking the line-of-sight between the sources and receptors. The sound control curtain materials shall meet a minimum Sound Transmission Class (STC) 20 rating, capable of reducing equipment noise by at least 5 dBA.

Implementing Agency: DCP

Enforcement Agency: Department of Building and Safety / Los Angeles Fire Department

Monitoring Phase/Monitoring Actions: as oil wells are proposed for abandonment

Action Indicating Compliance: Inclusion in grading permit specifications

EXHIBIT D

Public Comment



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Anita Scott <anitaoscott@gmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 8:03 AM

Dear Jennifer Torres,
I am a widow living on a fixed income and I depend upon my small royalties from oil wells in Los Angeles. Please don't allow them to be cut off by banning extraction! This is so important to my financial independence and stability.
Thank you,
Anita Otten Scott

Oils Email <planning.oildrilling@lacity.org>
To: Anita Scott <anitaoscott@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:23 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Lynne Hardin <mailagent@thesoftedge.com>

Tue, Aug 30, 2022 at 11:54 AM

Reply-To: wildmnthny1@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Lynne Hardin

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:35 PM

To: wildmnthny1@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Maryanne Greenberg <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 11:32 AM

Reply-To: maryanne3935@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Maryanne Greenberg

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:38 PM

To: maryanne3935@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Public Comment re: Draft Ordinance to Phase Out Oil Drilling

2 messages

syl via <sylcando68@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 1:54 PM

Thank you for the opportunity to provide public comment.

My name is Sylvia Arredondo, resident of Wilmington and grew up across the street from pump jacks that are now single family homes. I'm 1st generation growing up in Wilmington and my family still resides in our home that is less than .5 miles from the Warren E&P drill site where I spent nearly every summer during my childhood at the little league baseball field that is on the same parcel of land as this massive extractive site. My family and I live with asthma, respiratory, sinus, and reproductive health illnesses because we live in close proximity to oil operations.

The City Council's draft motion to phase out oil drilling citywide is a good first step and a strong start toward environmental justice. I support the draft plan to stop any future permitting for oil drilling or activity to Los Angeles, and the plan to phase out existing oil drilling sites as "non-conforming land uses."

But, there is still room to improve to center health and safety over oil industry profits and plundering the land we share:

- It's important to keep existing health and safety protections. Do not put families at increased risk by letting oil companies get a free pass in their final years.
- We need this ordinance to immediately ban acidization and ban any extension to the life of oil wells.
- Shorten the 20-year proposal for the phase-out period. It is unacceptable to make frontline communities live with 20 more years of oil pollution. This leaves an entire generation of residents exposed to pollution.
- Require thorough site clean up within 5 years, paid for by oil companies, to make way for community-supporting future land use. Do not allow oil companies to skip out on cleaning up their mess.

Again, thank you for reading my public comment.

Sylvia Arredondo

Oils Email <planning.oildrilling@lacity.org>
To: syl via <sylcando68@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:12 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

9/12/22, 9:02 PM

City of Los Angeles Mail - Public Comment re: Draft Ordinance to Phase Out Oil Drilling

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

Kathy birmingham <Kathy.Birmingham@hotmail.com>

Thu, Aug 25, 2022 at 10:27 AM

To: "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>
Cc: "ownerrelations@warrenresources.com" <ownerrelations@warrenresources.com>

It has come to my attention that the City of Los Angeles is taking steps to eliminate oil and gas operations and phase out oil drilling and extraction on even the smallest of properties like mine.

I am a 66 year old woman on Medicare and work part-time. Although the average amount I receive monthly averages around \$150, it does help with my expenses.

I have acquired this asset legally and your decision to end it without reason is unfair. This oil and gas operation is on private land and the government should not tell me what I can or cannot do on my private property.

What effect will this have on anything except creating more of a demand for natural resources and keeping gas prices high and unaffordable? What is the plan to replace the void of oil and gas caused by this ban?

If this ordinance is approved which I pray it won't be, I should receive some sort of compensation in exchange for your taking away my income/royalty I receive for this operation.

Sincerely

Kathy Birmingham
521 West Tenth Street
Traverse City, MI 49684
kathy.birmingham@hotmail.com

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:29 AM

To: Kathy birmingham <Kathy.Birmingham@hotmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

9/12/22, 9:16 PM

City of Los Angeles Mail - Case Number CPC-2022-4864-CA

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA4 messages

Beatrice Lutcmiah <mailagent@thesoftedge.com>

Sat, Aug 27, 2022 at 8:46 AM

Reply-To: Beatrice.lutcmiah@icloud.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

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Case Number: CPC-2022-4864-CA

Sincerely,

Beatrice Lutcmiah

Mary Engstrom <mailagent@thesoftedge.com>

Sat, Aug 27, 2022 at 9:32 AM

Reply-To: Marytce@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Mary Engstrom

Oils Email <planning.oildrilling@lacity.org>
To: Beatrice.lutchmiah@icloud.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:55 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Marytce@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:56 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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9/12/22, 8:46 PM

City of Los Angeles Mail - Please reject actions that increase energy prices: CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case #CPC-2022-4864-CA

2 messages

'Jock' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sun, Aug 28, 2022 at 12:34 PM

Reply-To: Jock <calbright3@aol.com>

To: Planning.oildrilling@lacity.org

As a life long Californian and mineral interest owner of several properties in the LA County area I was recently informed that the City and County of Los Angeles are contemplating ceasing all oil and gas production in the near and long term.

This seems incredibly short sighted given recent geo-political events, record high inflation mainly due to high energy prices (Supply and Demand) and a looming recession that may put many Los Angeles residents out of work.

Besides the thousands of jobs in this industry that would be lost please consider the thousands of mineral interest owners in the LA area who would lose valuable income that supports their families and employees.

Ceasing or discouraging oil production in the LA area at this time will only help to continue high energy prices and enhance air pollution adding additional exhaust from dozens of extra oil tankers every week that will be needed to fill the void. There are no pipelines to LA County or California

Do we really want to depend on dirty foreign oil imports when we can have much cleaner American hydrocarbon production?

If there are any pollution issues from our producers then I'm sure that can be rectified on a case by case basis.

At this time in history we should all be encouraging and helping the oil and gas industry to provide as much energy as possible not only locally but worldwide until alternative energy sources are in place. Thankfully this is now being realized elsewhere in America along with wind and solar.

I urge LA Planning and LA City Council to conduct an unbiased economic and air pollution study to determine if such drastic measures proposed are really warranted at this time.

Sincerely
Charles Albright

Sent from the all new AOL app for iOS

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:53 AM

To: Jock <calbright3@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Lilian Rubio <lilian.rubio@lacity.org>

Jennifer Torres, City Planning RE unlawful termination of leases

3hansons <3hansons@gmail.com>

Fri, Aug 26, 2022 at 9:08 PM

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Dear Ms Torres:

Please see the attached reply and note it as a response tld o the unlawful seizure of private property. Virtual hearing to be held Tuesday, August 30.

Respectfully,

Arthur Hanson, Affected Party

To: Jennifer Torres, City Planning

Planning.oildrilling@lacity.org
[200 North Spring St., Rm 701 City of Los Angeles, CA 90012](#)

Re: Unlawful Termination of Oil Production

Leases; Reference #CPC-2022-4864-CA

To: City Planning Commission

1. This appears to be an Eminent Domain Seizure, that being so, the City has no standing to institute this proceeding, or in lieu of Public Nuisance Abatement Action that would not pass the Evidentiary Requirements.

2. The U.S. Constitution, Section 10, provides "Powers prohibited to the States. Powers Prohibited, Absolutely. 1. No state shall...pass any bill of Attainder, ex post facto law, or law impairing the obligation of contracts..."

1. I am a party and Beneficiary to a lease held by Warren Resources in the middle of the last century. The State of California is or was the Beneficiary to lease revenues from oil lessees who are not cashing their oil revenue checks. I am in a contract with Warren Resources.

3. I have no knowledge of the Right of the City of Los Angeles to a. interfere with an interstate corporation or business, b. interfere with State Revenues, nor c. ignore the California State Constitution. Article 1, Section 7(a) states a person may not be deprived of life, liberty or property without due process of law, or denied equal protection of the laws. 7(b) provides "a citizen or class of citizens may not be granted privileges or immunities not granted on the same terms to all citizens."

The blanket denial of property owners and/or interstate oil producers is unconstitutional on its face.

4. In the City of Los Angeles, has an Environmental Impact Study been done? If so, where is it?

5. Have the Lessee's and Lessors been timely informed as to how much they will be paid for Compensation for their Projected Losses? If so, where can I be allowed to see said proposed compensation?

6. Has the City of Los Angeles been granted permission from the State to allow this non-conforming

seizure? Los Angeles is likely the only city to do this action. Chartered cities are required by state law to take property in some instances, as per Article 1, Section 7(b) of the California constitution.

7. If this local petroleum source is shut, where are we going to get oil for the local refineries?

8. Has this proposed action been approved by the Federal Government Agencies? Where may I see copies of said Federal approval?

9. President Joe "Judas Goat" Biden requested that oil companies produce more oil. Have you asked him to give his permission to Cut oil production? If so, where may I see his reply?

10. This is in violation of Presidential stated Public Policy. Why are you pursuing it? Please provide me access so I may determine who is responsible for this blatant incompetence. Please note that all requests for information are being made pursuant to the California Government Code Section 6250 et seq.

11. The U.S. Constitution, Amendment Five, Criminal Proceedings and Condemnation of Property provides, in relevant part: "...be deprived of Life, Liberty, without due process of law: nor shall private property be taken for Public Use, without Just Compensation." Amendment VII Trial by Jury Section 1, In suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any court of the United States, than according to the rules of the common law.

That being so, we are entitled to a jury trial to both the reason for the taking, the amount of compensation to be paid to Lessors and Lessees, should the taking be valid. The Statute limiting the compensation to a five year period is a Bill of Attainer and is not Constitutional in Eminent Domain Proceedings.

The City of Los Angeles is Equitable Estopped from changing the rules in middle of the game as per Cal Evidence Code Section 623. In other words, oil production is "grandfathered in." Production has, in effect, an easement having done so for over 7 years, as per California Law.

12. Lessors and Lessees have relied upon the law and the acquiescence of the City of Los Angeles and State Law to Lease, Improve, and Maintain their lifestyle and to pursue Happiness with income derived from Revenues derived from oil production. To take that income to pursue Happiness, as stated in the constitution of the United States, would be deplorable.

13. The Oil Industry is in part a tourism attraction in the Los Angeles harbor area. In my lifetime, when I was in the Harbor area, I have been asked several times "Where are the oil wells? I have seen postcards of them and refineries in the movies. " I have also seen tourists taking pictures of oil wells in the background, in the Harbor Area. The working oil wells should be declared a Historical Monument, being a part of History. Note that within the walls of City Hall itself are pictures displaying these oil wells proudly.

14. The City will have to compensate all of the people who have mineral rights in the City of Los Angeles and the corporations which have purchased land and mineral rights/leases so that they may drill for oil and gas. If the City plans to pay millions of dollars in this inflationary time, it may not be prudent. Changing the laws after the leases exist also violates Title 42 USC Sec. 1983, and is a willful tort. See Moreland Properties LLC v. City of Thornton, D.Colo.2008, 559 F.Supp.2d 1133. see West Law Civil Rights 1351(3).

Respectfully,

Arthur Hanson, In Pro Per Dated: August , 2022

805-616-0434(cell) 213-6181335 (wife)

P O Box 50433

Oxnard, CA 93031 or

[5056 Glen Iris Ave.](#)

[Los Angeles, CA 90041](#)

Sent from [Mail](#) for Windows



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

suzb@sti.net <suzb@sti.net>
To: Planning.oildrilling@lacity.org

Sun, Aug 28, 2022 at 12:44 PM

ATTN: Jennifer Torres, Department of City Planning

RE: Tuesday, August 30, 2022 Hearing to discuss phasing out oil drilling in the City.
CPC-2022-4864-CA

Dear Jennifer Torres,

I am respectfully asking that you don't pass this ordinance.

Warren Resources is committed to conducting business as good stewards of the land and due to the increasing demand for energy (especially in emergency situations) we need to keep the safe and responsible production of our natural resources.

Respectfully,
Suzanne Banks

Oils Email <planning.oildrilling@lacity.org>
To: suzb@sti.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:55 AM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

ckanne@lvcoxmail.com <ckanne@lvcoxmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 3:14 PM

To whom it may concern,

I am opposed to the Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA. I think this is a very bad idea especially during these uncertain economic times.

Sincerely,

Charles R Kanne

Oils Email <planning.oildrilling@lacity.org>
To: ckanne@lvcoxmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:09 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Eric Olson <eoesq@boldlaw.com>

Mon, Aug 29, 2022 at 3:08 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Dear Mayor, Councilman, and City Planner,

1. I am the holder of a small oil interest that originally came into our family when my grandmother purchased it.
2. To the best of my knowledge, this interest does not represent any new drilling and there are no violations of applicable regulations directed toward my interest.
3. I am informed by our operator, Warren Resources, Inc that vocal interests are attempting to shut down the present operations rather than let them play out in the ordinary course.
4. I personally drive an EV and have previously had 3 hybrid cars and I applaud the recent action of the State to phase out sales of new non-gasoline cars.
5. At the same time, the need for petroleum products is not going to evaporate overnight.
6. I anticipate that in the ordinary course, my interest will play out over time just as the need for petroleum products will decline over time.

Eric Olson

Baker, Olson, LeCroy & Danielian

100 W. Broadway #990

Glendale, CA 91210

T: 818 502 5600

C: 626 224 5619

F: 818 241 2653

eoesq@boldlaw.com

www.boldlaw.com

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:52 PM

To: Eric Olson <eoesq@boldlaw.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA4 messages

Del White <mailagent@thesoftedge.com>

Mon, Aug 29, 2022 at 5:48 AM

Reply-To: Delbwhite@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Del White

James Reeves <mailagent@thesoftedge.com>

Mon, Aug 29, 2022 at 12:02 PM

Reply-To: Reevesj@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

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Case Number: CPC-2022-4864-CA

Sincerely,

James Reeves

Oils Email <planning.oildrilling@lacity.org>
To: Reevesj@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:26 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Delbwhite@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:26 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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9/12/22, 8:52 PM

City of Los Angeles Mail - Reject actions that will increase energy prices: CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comments: Ban New Oil Drilling and Declare Existing Drilling Non-Conforming Land Use

2 messages

Amy "Catfox" Campion <bgirlcatfox@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 2:19 PM

To Whom it May Concern at the City of Los Angeles:

I'm writing to strongly encourage the city to ban new oil drilling and declare existing drilling a non-conforming land use. I stand in solidarity with STAND-LA in full support of the following goals:

The City should move quickly to adopt this ordinance that will zone out oil drilling city-wide.

The City code should maintain health existing protections during the phase-out period and immediately prohibit dangerous activities like acidization.

The City should commit to shortening the phase-out period from the existing 20-year timeframe.

The City should mandate oil companies pay for comprehensive well plugging and site clean up after oil sites are shut down, and promote community-benefiting redevelopment based on feedback from impacted residents.

We look forward to working with the City to continue making progress toward environmental justice.

We hope that the Planning Department can take this first draft and strengthen it with the input of frontline communities and public health experts.

Sincerely,

Amy Campion Scoggins
213-221-9980
bgirlcatfox@gmail.com
dance art maker | activist | educator | bgirl | capoeirista | mama
*not necessarily in that order

Oils Email <planning.oildrilling@lacity.org>
To: Amy Catfox Campion <bgirlcatfox@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:14 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Jcgoldman@prodigy.net <Jcgoldman@prodigy.net>

Wed, Aug 31, 2022 at 11:26 AM

Reply-To: Jcgoldman@prodigy.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Joe Goldman

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:56 AM

To: Jcgoldman@prodigy.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA

2 messages

John Weidlein <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 11:18 AM

Reply-To: johnweidlein@live.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

John Weidlein

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:21 AM

To: johnweidlein@live.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Support for ordinance declaring oil drilling a nonconforming land use, case CPC-2022-4864-CA

2 messages

Alfonso Directo Jr. <adirecto@act-la.org>
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 4:30 PM

Dear LA City Planning Department,

The Alliance for Community Transit - Los Angeles (ACT-LA) strongly supports the city ordinance that declares oil drilling a non-conforming land use. Please read our attached letter. This comment is in connection with case number CPC-2022-4864-CA.

Thank you,
Alfonso

--

Alfonso Directo Jr., PE (he/him/his)

Senior Advocacy Manager | Alliance for Community Transit - Los Angeles

cell: (949) 400-0818

website: www.act-la.org

Please note: We've moved our email addresses and website to act-la.org!



2022-0902 - STAND-LA Oil & Gas Ordinance Ally Letter.pdf

72K

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 5:15 PM

To: "Alfonso Directo Jr." <adirecto@act-la.org>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



September 2, 2022

Los Angeles City Planning Department
200 North Spring Street, Room 701
Los Angeles, CA 90012
planning.oildrilling@lacity.org
Case Number: CPC-2022-4864-CA

Dear Los Angeles City Planning Department:

We, Alliance for Community Transit - Los Angeles (ACT-LA), are writing to voice our strong support for the adoption of the proposed oil well ordinance that would declare oil drilling a non-conforming land use city-wide. We applaud the Planning Department for a strong draft ordinance and for moving expeditiously now following a five-year process in the Los Angeles City Council. We urge the City to adopt this ordinance into law by the end of the year.

The health and safety impacts of oil extraction in neighborhoods are well documented. Equally well-documented is the environmental racism manifested in those impacts being disproportionately experienced by low-income Black and Latinx Angelenos. To fulfill its claim to leadership on environmental and climate issues, Los Angeles must move quickly to phase out fossil fuels completely, including a ban on oil extraction city-wide.

Our organization strives to create just, equitable, and sustainable transportation systems and neighborhoods, placing the interest of low income communities and communities first as we create a more sustainable region.

To ensure the strongest ordinance possible, we urge the Planning Department to make the following amendments and clarifications to the draft before presenting it to the City Planning Commission:

1. **Maintain existing protections in the City's code.** While advocates and residents have expressed concern for years that the City's existing regulations over oil extraction are insufficient, we are concerned that the existing draft proposes to strike them from the code completely and leave the City with even fewer tools to protect residents from dangerous drilling during a likely multi-year phase-out period.
2. **Prohibit "maintenance" activities**, including acidization and acid well maintenance, that pose an ongoing threat to health and safety and extend the life of a drill site.
3. **Incorporate a clear 5-year timeframe and strong standards for well plugging and site remediation**, including mechanisms to ensure oil companies pay for these

activities. Oil drilling sites should be rezoned to promote healthy and community-serving land use following a process with robust input from the surrounding neighborhood.

4. **Enshrine a commitment to amending the existing 20-year phase-out period.** 20 years is quite simply too long for oil wells to continue operating after being declared a non-conforming land use. The city must commit to reviewing the existing phase-out following the completion of amortization studies currently being commissioned.

Thank you for considering our comments and for your work to advance this critical environmental justice policy for the City of Los Angeles.

Sincerely,

The Alliance for Community Transit - Los Angeles



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling Ban Ordinance (comments due September 2nd)2 messages

Kimberly Christensen <kimwncseat4@gmail.com>

Fri, Sep 2, 2022 at 9:02 PM

To: planning.oildrilling@lacity.org

Cc: Terri Tippit <tmtippit@ca.rr.com>, Paul Koretz <paul.koretz@lacity.org>, Dylan Sittig <Dylan.sittig@lacity.org>

Gas and Oil Drilling Planning Unit Staff,

Please find attached our comment letter relating to the oil and gas drilling ban ordinance.

Please confirm receipt and add us to the list for future notifications.

Thank you,
Kimberly Christensen, AICP, Land Use Chair and Board Member
West of Westwood Homeowners Association

**Oil and Gas Drilling Ordinance WOWHOA letter 09.02.2022.pdf**129K

Oils Email <planning.oildrilling@lacity.org>

Tue, Sep 6, 2022 at 1:08 PM

To: Kimberly Christensen <kimwncseat4@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

West of Westwood
Homeowners Association

September 2, 2022

City of Los Angeles
Oil Regulation Code Amendment Unit
Los Angeles, CA
Via email: planning.oildrilling@lacity.org

RE: Oil and Gas Drilling Ordinance Comments

Gas and Oil Drilling Planning Unit Staff:

The West of Westwood Homeowners Association located in the City of Los Angeles represents approximately 1,200 households in the Westside of Los Angeles.

An oil drilling facility is located at Cheviot Park south of Pico Boulevard just to the east of our neighborhood. Based upon past issues and concerns about health and safety risks that have arisen surrounding the operation and management of this facility and undoubtedly many other such facilities throughout the City, we wholeheartedly **support** the proposed ordinance to ban new oil and gas drilling activities citywide and that existing oil operations will become legal nonconforming uses upon adoption of the ordinance. We agree that these facilities create negative health and safety impacts when they occur in close proximity to sensitive uses such as homes, schools, places of worship, recreation facilities and healthcare facilities which is the case for the facility located in Cheviot Park.

We understand that all existing oil facilities will be required to cease operation within a maximum 20-year amortization period and that the Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) has been directed to prepare an amortization study. While we understand that these facilities are being provided an amortization period to allow operators to recoup their capital investments in oil drilling activities prior to instituting plans for decommissioning of these existing wells, we support potential future code amendments relating to shutting down individual wells sooner if the owners have recoup their investments prior to the proposed 20-year amortization period provided in the ordinance. Due to the sensitive location of the well in Cheviot Park, we strongly support shutting down this well as early as is feasible.

We support the proper servicing activities such as replacement of tanks and equipment to ensure the safe operation of these facilities during their amortization period for the safety of the facility and our community. Our main concern is that appropriate measures are put in place (if they do not already exist), in coordinating with all applicable State and regional agencies involved in the decommissioning process for the safe abandonment and plugging of wells and the comprehensive site remediation necessary following the ceasing of active oil production. Additionally, we want mechanisms put in place at the local level to ensuring that oil companies are held responsible and financially liable for the abandonment and remediation process.

Please feel free to contact us with any questions and please keep both of us on your interested parties list for notification of future meetings, public hearing notices, and release of additional documents pertaining to this proposed ordinance.

Sincerely,

Terri Tippit

Terri Tippit, President

Kimberly Christensen, AICP

Kimberly Christensen, Land Use Committee Chair and Board Member

Cc: Councilman Paul Koretz, CD5 (paul.koretz@lacity.org)
Dylan Sitting, Planning Deputy, CD5 (dylan.sittig@lacity.org)



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'BARBARA SCHEPPMANN' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 1:52 PM

Reply-To: BARBARA SCHEPPMANN <bscheppmann@verizon.net>

To: Planning.oildrilling@lacity.org

Sent from my iPad

**Traditional Letter.pdf**

17K

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:25 PM

To: BARBARA SCHEPPMANN <bscheppmann@verizon.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

On Thu, Aug 25, 2022 at 1:52 PM 'BARBARA SCHEPPMANN' via Planning Oil Drilling <planning.oildrilling@lacity.org> wrote:

Sent from my iPad

FROM THE DESK OF

DAVID W. SCHEPPMANN

August 25, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

Re: Case Number CPC-2022-4864-CA

Dear Ms. Torres,

As a royalty owner with Warren Resources, Inc. I felt compelled to write regarding the above Case Number coming before the City of Los Angeles. I am hoping that your department will put party politics aside and do what is beneficial to all who will be impacted by the decisions made.

The stopping of all new and existing oil and gas extraction in the City of Los Angeles would have far reaching negative effects on thousands of people. With limited green energy infrastructure presently in place, Los Angeles and the surrounding areas would suffer many losses from which there would be no recovery.

The loss of revenue stretches across industries and would have a huge impact on the State in general. The loss of production would not only cost employees a job but, adding insult to injury, would also drive up the cost at the pump for all of us. Forcing everyone to give up their vehicles, gas guzzlers and hybrids alike, to purchase expensive and ineffective electric vehicles is unfathomable- what a nightmare that would create. Is the City really considering this as reasonable for the people of Los Angeles? Consider the nightmare for air travel, train travel, car travel, farm equipment, gardening equipment, factories, cosmetics industry, etc. who all rely on petroleum products.

During the Virtual Presentations & Public Hearing please consider what is best for the people you represent. This post-COVID world is chaotic enough. Please be a mind and voice of reason.

Sincerely yours,

David W. Scheppmann

14390 INKPA ROAD
Apple, Valley, CA 92307



Jennifer Torres <jenny.torres@lacity.org>

Stop Oil Drilling

2 messages

Joseph Ruiz <j.antony.ruizr@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 4:13 PM

Hello my name is Joseph. I'm a long-time resident of Wilmington, and a Urban Planning student at UCI. I support the draft plan to stop any future permitting for oil drilling or activity in LA, and the plan to phase out existing oil drilling sites as "non-conforming land uses". I want to see the City shorten the 20-year proposal for the phase-out period. To make us live with 20 more years of oil pollution is unacceptable. That leaves an entire generation of residents exposed to pollution.

We hope that the city takes this important step to listen to us, those in the frontlines, and the public health experts to make sure we have a clean and safe future.

Best, Joseph Ruiz

Oils Email <planning.oildrilling@lacity.org>
To: Joseph Ruiz <j.antony.ruizr@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:18 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Linda Pfeifer <lspfeifer26@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 12:27 PM

Jennifer Torres,

My brother and sister and I together own one oil well in the city of Los Angeles. We object to the "banning" of oil drilling as we feel there is an increasing need for energy that other resources have not been able to furnish.
Please tell me what we can do to stop this.

If this ordinance passes:

- * Will we be compensated for our loss of Royalties?
- * Is there any possibility that we can remove the ordinance in the future if needed?

Thank you for your time.

Linda Pfeifer - lspfeifer26@gmail.com
[N5221 Wildcat Rd.](#)
[Iron Ridge, WI 53035](#)

714-231-8226

Oils Email <planning.oildrilling@lacity.org>
To: Linda Pfeifer <lspfeifer26@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:02 PM

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case #CPC-2022-4864-CA

2 messages

holly.wray@hotmail.com <holly.wray@hotmail.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 4:08 PM

To whom it may concern:

Please keep me informed of the status of this case and the City's proposed ban on oil and gas drilling.

Thank you,
Holly

Holly Lewis, Trustee
Marilyn A Turner Trust
903.714.4472 - mobile

Oils Email <planning.oildrilling@lacity.org>
To: holly.wray@hotmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 11:54 AM

Hello,

Thank you for your interest in the Oil and Gas Drilling Ordinance. Your contact information has been added to the Interested parties list and you'll be notified of the progress of the Oil and Gas Drilling Ordinance. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling

2 messages

Lisa S <hoopglow20@gmail.com>
To: Planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 1:21 PM

Attn: Jennifer Torres and Staff
Regarding: case number CPC-2022-4864-CA.

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Lisa Serrantino

Oils Email <planning.oildrilling@lacity.org>
To: Lisa S <hoopglow20@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:30 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively

scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

BizFed Comment Letter - LA City Oil and Gas Ordinance

3 messages

Sarah Wiltfong <sarah.wiltfong@bizfed.org>
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 7:41 PM

Good evening,

Please find attached BizFed's letter in response to the LA City Oil & Gas Ordinance. If you have any questions, please reach out to me directly.

Thank you!

Sincerely,

**Sarah Wiltfong****Director of Advocacy & Policy**310.213.8742 - sarah.wiltfong@bizfed.org**Los Angeles County Business Federation**

A grassroots alliance of 230 diverse business groups mobilizing 410,000 employers

#BusinessMakesLAWork

Join Us for our In-person Freshman Policymakers Reception on Thurs 9/22 at 5 PM. We're celebrating all 2021-2022 newly elected officials at BLVD MRKT. Buy tickets here - <https://bit.ly/3PP9oEd>

**BizFed_LA City Oil and Gas Ordinance_090222.pdf**
939K

Oils Email <planning.oildrilling@lacity.org>
To: Sarah Wiltfong <sarah.wiltfong@bizfed.org>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Sep 6, 2022 at 12:46 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Sarah Wiltfong <sarah.wiltfong@bizfed.org>
To: Oils Email <planning.oildrilling@lacity.org>

Mon, Sep 12, 2022 at 3:27 PM

Thank you! Appreciate you letting me know. Do we know what time the commission meeting is on Sept 22?

Thank you!

Sincerely,



Sarah Wiltfong

Director of Advocacy & Policy

310.213.8742 - sarah.wiltfong@bizfed.org

Los Angeles County Business Federation

A grassroots alliance of 230 diverse business groups mobilizing 410,000 employers

#BusinessMakesLAWork

Join Us for our In-person Freshman Policymakers Reception on Thurs 9/22 at 5 PM. We're celebrating all 2021-2022 newly elected officials at BLVD MRKT. Buy tickets here - <https://bit.ly/3PP9oEd>

[Quoted text hidden]

9/2/22

Los Angeles City Planning Department
Oil Regulation Code Amendment Unit

Via email: planning.oildrilling@lacity.org

Re: Opposition to Oil and Gas Drilling Ordinance – Case Number CPC-2022-4864-CA

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 220 business organizations who represent over 450,000 employers with 5 million employees in Los Angeles County. We are writing to express our strong opposition to the Oil and Gas Drilling Ordinance, which seeks to phase out of all drilling in the City of Los Angeles in 20 years.

As an organization who represents a wide range of industries across the Los Angeles region, not only are we concerned with the direct impact on good paying jobs and the loss of a significant source of taxpayer revenue within the City itself, but also the economic impact of the LA County region as a whole. This includes the countywide impact on indirect jobs supplied by small businesses, energy costs, energy reliability, and more. What's more, this ordinance will further increase our dependence on foreign oil, making the region less resilient and increase emissions overall.

Economic Impacts

This ordinance will eliminate thousands of direct good paying jobs (average pay of over \$100,000/yr), many more thousands of indirect impacted jobs, over \$200million in taxpayer revenue, and billions in economic output. The jobs provided by the oil and gas industry come from a wide range of backgrounds: GEDs to PhDs, veterans, single parents, "second chancers" and more. These individuals have been provided good opportunities to not only earn a decent living but to be able to afford the high cost of living in Los Angeles. The just transition working group will have to find ways to transfer these workers into as good or better paying jobs and find other sources of revenue for the city that pays for essential services to residents. Even though the ordinance touts a 20-year phase out, the inability for current oil wells to be maintained will phase out oil and gas extraction significantly sooner – giving the task force, residents, workers, and owner/operators less time to transition effectively. Given the significant impacts this phase out will have, we ask that a full economic impact analysis be completed, and critiqued, before any ordinance comes to the City Council for a vote.

Increased Dependency on Foreign Oil

Many lessons were learned during the COVID-19 pandemic, including how fragile our supply chain is. Resiliency in an area as large as Los Angeles is paramount in making sure we can get food on the table, keep our lights on, and move from A to B without significant interruptions when emergency's hit. The pandemic showed Los Angeles just how dependent we were on outside sources for our food, clothing and yes – energy. Instead of working towards solutions to make sure we are more resilient, LA City and California continue to push policy's that shut down production here and further drive industries out of state or county. Already, over 2/3rds of California's demand for petroleum comes from out of state, and a shutdown of oil production here in LA will increase that demand. What's more, oil production in California is mandated by some of the strictest environmental laws in the world. Not only will a shutdown of Los Angeles wells increase supply elsewhere, but it will

also increase emissions through the importation of the oil and by not following the same environmental standards we have.

Concern for the unjust taking of land

When a government entity decides privately owned land is no longer able to operate in a certain vicinity, the law does provide they can terminate nonconforming uses so long as there is enough time for that private entity to transition and recuperate their losses or that governing entity justly compensates that owner. This may work for a brick-and-mortar store which can more easily move their goods from one place to another, the same cannot be said for an oil rights owner. When oil wells are shut down, and cannot be moved, there is no other way for them to recuperate their losses except by being justly compensated. The City will likely have to plan, in addition to the significant taxpayer revenue being lost, the financial liabilities of a taking of a property.

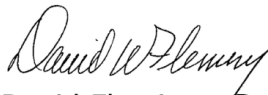
We hope you will consider our concerns before moving forward with this ordinance. If you have any questions, please contact sarah.wiltfong@bizfed.org.

Thank you!

Sincerely,



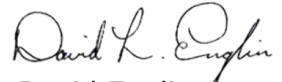
Brissa Sotelo-Vargas
BizFed Chair



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO



David Englin
BizFed President

BizFed Association Members

7-11 Franchise Owners Association for SoCal
Action Apartment Association
Alhambra Chamber
American Beverage Association
Antelope Valley Chamber formerly Lancaster Chamber of Commerce
Apartment Association of Greater Los Angeles
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian Trade & Labor Association
Arts District Los Angeles
Associated Builders & Contractors SoCal (ABC SoCal)
Association of Club Executives
Association of Independent Commercial Producers
AV Edge California
Azusa Chamber
Beverly Hills Bar Association
Beverly Hills Chamber
BioCom
Black Business Association
BNI4SUCCESS
Bowling Centers of SoCal
Boyle Heights Chamber of Commerce
Building Industry Association - LA/Ventura Counties
Building Industry Association of Southern California
Building Industry Association- Baldyview
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of Realtors
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CABIA California Business and Industrial Alliance
Calabasas Chamber of Commerce
CalAsian Chamber
CalChamber
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Business Properties
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Natural Gas Producers Association
California Restaurant Association
California Retailers Association
California Self Storage Association
California Small Business Alliance
California Society of CPAs - Los Angeles Chapter
California Trucking Association
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Cerritos Regional Chamber of Commerce
Chatsworth Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Claremont Chamber of Commerce
Commercial Industrial Council/Chamber of Commerce
Compton Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council on Infill Builders
Covina Chamber
Crenshaw Chamber of Commerce

Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Alhambra Business Association
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Encino Chamber of Commerce
Energy Independence Now EIN
Engineering Contractor's Association
EXP Future
FastLink DTLA
Filipino American Chamber of Commerce
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Leimert Park Crenshaw Corridor BID
Greater Los Angeles African American Chamber
Greater Los Angeles Association of Realtors
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
ICBWA- International Cannabis Women Business Association
Independent Cities Association
Industrial Environmental Association
Industry Business Council
Inglewood Board of Real Estate
Inland Empire Economic Partnership
International Franchise Association
Irwindale Chamber of Commerce
La Cañada Flintridge Chamber
LA Coalition
LA Fashion District BID
LA South Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Long Beach Economic Partnership
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Economic Development Center
Los Angeles Gateway Chamber of Commerce
Los Angeles LGBTQ Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
Los Angeles World Affairs Council/Town Hall Los Angeles
MADIA
Malibu Chamber of Commerce
Manhattan Beach Chamber of Commerce
Marketplace Industry Association
Monrovia Chamber
Motion Picture Association of America, Inc.
MoveLA
MultiCultural Business Alliance
NAIOP Southern California Chapter
NAREIT
National Association of Minority Contractors
National Association of Tobacco Outlets
National Association of Women Business Owners
National Association of Women Business Owners - LA

National Association of Women Business Owners- California
National Federation of Independent Business Owners California
National Hookah
National Latina Business Women's Association
Orange County Business Council
Orange County Hispanic Chamber of Commerce
Pacific Merchant Shipping Association
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PGA
PhRMA
Pico Rivera Chamber of Commerce
Planned Parenthood Affiliates of California
Pomona Chamber
Rancho Southeast REALTORS
ReadyNation California
Recording Industry Association of America
Regional CAL Black Chamber, SVF
Regional Hispanic Chambers
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
South Pasadena Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sportfishing Association of California
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Torrance Area Chamber
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers – San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Venice Chamber of Commerce
Vermont Slauson Economic Development Corporation
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Electrical Contractors Association
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Whittier Chamber of Commerce
Wilmington Chamber
Women's Business Enterprise Council
World Trade Center



Jennifer Torres <jenny.torres@lacity.org>

Yo pienso que deberían cerrarlas más pronto porque 20 años es demasiado tiempo para seguir contaminando los pulmones de las personas que estamos alrededor y no sabemos si nuestra salud ya allegar a 20 años más por favor no nos contaminen más nuestra salud no está tan bien para resistir y la de nuestros niños por favor a corten ese tiempo gracias

2 messages

'Rubi Lara' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 9:55 PM

Reply-To: Rubi Lara <rubilara1977@icloud.com>

To: planning.oildrilling@lacity.org

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:08 AM

To: Rubi Lara <rubilara1977@icloud.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hola,

Gracias por su correo electrónico. Se recibió y su respuesta se registrará como comentario público. Los comentarios públicos informarán la recomendación de Planificación de la Ciudad a la Comisión de Planificación de la Ciudad, quien escuchará la ordenanza y hará una recomendación al Concejo Municipal. La ordenanza propuesta está programada tentativamente para presentarse ante la Comisión de Planificación de la Ciudad el 22 de septiembre de 2022. La agenda final de la Comisión de Planificación de la Ciudad se publicará 72 horas antes de la fecha de la audiencia en nuestro sitio web de planificación:

planning.lacity.org/about/commissions-boards-hearings.

Para obtener más información sobre la ordenanza propuesta, visite el sitio web de la ordenanza:

<https://planning.lacity.org/ordenanza-de-perforacion-de-petroleo-y-gas>.

Gracias.

On Tue, Aug 30, 2022 at 9:55 PM 'Rubi Lara' via Planning Oil Drilling <planning.oildrilling@lacity.org> wrote:

Sent from my iPhone



Jennifer Torres <jenny.torres@lacity.org>

LA ordinance letter 9-2-22

2 messages

Rock Zierman <rock@cipa.org>

Fri, Sep 2, 2022 at 12:25 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: Sean Wallentine <sean@cipa.org>, David Duran <david@durankinst.com>, "trent.rosenlieb@gmail.com" <trent.rosenlieb@gmail.com>

Please find attached comments from the California Independent Petroleum Association re: Case number CPC-2022-4864-CA.

Best,

**ROCK ZIERMAN**
CHIEF EXECUTIVE OFFICER

1001 K STREET, 6TH FLOOR
SACRAMENTO, CA 95814
916-447-1177 | WWW.CIPA.ORG



LA ordinance letter 9-2-22.doc

47K

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:01 PM

To: Rock Zierman <rock@cipa.org>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



California Independent Petroleum Association
1001 K Street, 6th Floor
Sacramento, CA 95814
Phone: (916) 447-1177
Fax: (916) 447-1144

September 2, 2022

Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
Via mail to: planning.oildrilling@lacity.org

Re: Case number CPC-2022-4864-CA.

Dear Planners:

California Independent Petroleum Association (CIPA) is strongly opposed to the proposed LA City Oil and Gas Drilling Ordinance as it is presently drafted. CIPA is a non-profit, non-partisan trade association representing over 300 independent crude oil and natural gas producers, royalty owners, and service and supply companies operating in California, several CIPA members have operations in the LA Basin.

This ordinance is bad for jobs, the economy, the environment and is not based on science. Loss of oil production in Los Angeles will burden Angelenos with higher taxes, higher utility bills, higher gas prices, higher air emissions, and no improvement of public health.

Thousands of well-paying jobs will be lost if this ordinance is enacted by the LA City Council. The average annual wage for workers in the oil and gas industry in southern California is \$120,000. Jobs are across the spectrum from truck drivers to geologist and engineers to health and safety professionals and environmental advisors. All these jobs could be gone in a few short years, there will be no “just transition”.

The labor force in the oil and gas field of southern California is one of the most diverse work forces that exists. Education levels in this industry range from men and women with a G.E.D. to those with a PhD. Many veterans and “second chancers” are employed in this industry representing a broad cross section of diverse racial and socioeconomic backgrounds.

Loss of oil production in the City of Los Angeles will lead to more imports of oil coming into California through the Ports of Long Beach and Los Angeles. This proposed ordinance does nothing to curb demand, consumption will not be reduced. The South Coast Air Quality Management District has identified oil tankers the major sources of air pollution in the LA Basin. California is an energy island, there are no pipelines that bring crude oil into California.

California presently imports about 70% of the oil it consumes, all via tanker ships. None of the countries that import oil to California have the strict environmental regulations that California oil producers must follow. California has the most stringent environmental regulations in the world, resulting in California producing the cleanest oil in the world. Oil production in Ecuador, the number one source of foreign crude, is destroying the Amazon Rain Forest and vital habitat for several endangered and threatened species.

Scientific studies do not support claims of detrimental health effects from oil and gas drilling and production operations. The Los Angeles County Oil and Gas Strike found that overall the health of residents that live near oil and gas wells is no worse than the overall health of residents throughout Los Angeles County. In fact, in a peer-reviewed study by the California Council on Science and Technology it was reported that upstream oil and gas operations represent less than 1% of criteria air pollutants and toxic air emissions, according to the

SCAQMD. Health quality of residents living in homes near oil and gas producing wells, wells that were present long before Department of Planning approved building homes adjacent to the wells, will not experience improved health conditions.

From a June 2020 study by Capitol Matrix Consulting, it is estimated that the oil and gas industry accounts for about \$250 million in Los Angeles City General Fund revenues. This considers the taxes directly paid by oil and gas businesses, as well as taxes paid by oil and gas workers and suppliers. The total represents about 4 percent of the City's overall General Fund budget.

This ordinance will not only impact the oil and gas companies providing valuable services and revenues to the City, but it will also adversely impact royalty owners. Hundreds of families have had royalties in their families for generations. Many of these royalty owners are now seniors living on fixed incomes, relying heavily on royalty income as a supplemental source of revenue. If this ordinance is put in place, drilling and producing operations will cease and this income stream will be "taken" from many citizens that depend on it.

If the ordinance is passed and companies are unable to access the minerals that are rightfully theirs to recover (and make the associated royalty payments) substantial lawsuits will result based on governmental taking of property rights. A recent study by the City of Los Angeles estimated that the cost of litigation and compensation for taking the minerals could approach \$100,000,000. This price tag would burden Angelenos with higher taxes to cover these extreme costs.

This ordinance sets the standard for bad policy. It will impact jobs for thousands and reduce revenues for the City. The result will be no improvement of local environmental conditions while having a tremendous negative impact on the global environment. Instituting this ordinance will have a high propensity of exposing the City to significant litigation expenses that will be shouldered by the citizens of Los Angeles.

Thank you for the opportunity to comment on the draft Oil and Gas Drilling ordinance. CIPA looks forward to working with the City in arriving at a solution that will benefit all stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rock Zierman', with a stylized flourish at the end.

Rock Zierman, CEO



Jennifer Torres <jenny.torres@lacity.org>

Against neighborhood drilling

2 messages

'Natalie Hall' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 12:32 PM

Reply-To: Natalie Hall <nghall2000@aol.com>

To: planning.oildrilling@lacity.org

I stand against neighborhood drilling.

Natalie Hall



Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:23 PM

To: Natalie Hall <nghall2000@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

amortization study

2 messages

Lisa Hart <lisahart@ncsa.la>

Tue, Aug 30, 2022 at 6:25 PM

To: Los Angeles City Planning <planning.oildrilling@lacity.org>

Cc: Lisa Hart <lisahart@ncsa.la>, Jamie Hwang <jamie.hwang@lacity.org>

Hello

I'm having a hard time with the public hearing process as it is designed, so thought I'd try the old-fashioned way.

How long is the amortization study supposed to take?

And what does the amortization study involve? Why does it take the time it takes?

And why isn't the office of the petroleum administrator represented at this hearing?

Thank you,

Lisa Hart (*she/her*)

Board Member

**NEIGHBORHOOD COUNCIL
SUSTAINABILITY
ALLIANCE**lisahart@ncsa.la

323.660.2780 (cell)

[linkedin.com/in/lisamariehart](https://www.linkedin.com/in/lisamariehart)ncsa.la

Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 8:59 AM

To: Lisa Hart <lisahart@ncsa.la>

Cc: Jamie Hwang <jamie.hwang@lacity.org>, planning.oildrilling@lacity.org

Hello,

Thank you for your email. Our staff will reach out shortly to address your questions.

The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Ban on new oil and gas extraction

2 messages

cmbergman1 via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:41 AM

Reply-To: cmbergman1@verizon.net

To: cmbergman1@verizon.net

To the City of Los Angeles leaders:

We are definitely AGAINST the proposed ban on new gas and oil extraction being considered by the City of Los Angeles. To require the cessation of these operations would be a detriment to those in our area who rely on gasoline for transportation. Our public transit system is not adequate for the general population - too slow and infrequent! And it is not reasonable to expect (as our governor proposes) that all cars be electric in the coming decades! For short trips, they are fine. However, anyone who wishes to travel anywhere outside of Southern California, will find it difficult to recharge en route.

Please reconsider this ban, and vote NO!

Thank you,
William and Constance Bergman
Cerritos, CA

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:56 AM

To: cmbergman1@verizon.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Ban on oil and gas drilling Los Angeles

2 messages

Iwaynef via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:32 AM

Reply-To: lwaynef@aol.com

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Dear Ms Torres,

I am writing to urge you not to ban oil and gas drilling in Los Angeles. Natural resources will become more important in the next few years, and Warren Resources is very responsible in it's job. My family depends on the income from this long time investment in the State of Calif. and it would be very difficult on us if you cut off our royalty payments. Please reconsider and allow responsible drilling to continue.

Sincerely,

Wayne Freeman
Long Beach, Calif.

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:20 PM

To: lwaynef@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

BAN ON OIL & GAS Drilling

2 messages

Pilar Crew <crewpillar@gmail.com>

Mon, Aug 29, 2022 at 2:56 PM

To: planning.oildrilling@lacity.org, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>, councilmember.buscaino@lacity.org

**RE: City of Los Angeles to Ban Oil & Gas Drilling
CASE # CPC-2022-4864-CA**

This letter is to express my absolute protest to the cessation of production as well as Oil & Gas drilling in California. It is completely immature in terms of research as to why & how this will help the state of California. And this matter should also be decided on a bigger scale given the amount of individuals such a measure would affect.

PLEASE DO NOT BAN OIL & GAS Drilling in California. This is not the will of the people. This is government overreaching!

best regards,

Pilar Crew

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:51 PM

To: Pilar Crew <crewpillar@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Banning Oil & Gas Drilling

2 messages

Christina Upton <uptoncl@outlook.com>

Tue, Aug 23, 2022 at 11:25 AM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Ms Torres,

Case #: CPC-2022-4864-CA

I would like to go on record as I am against the banning of oil & gas drilling. I have had me Oil Rights for over 50+ years, the sole reason is for the income. You are now ceasing an income to me and making my Oil Rights worthless. Would you like one of your incomes to cease? You are destroying all the jobs involved and making more unemployed individuals. Do you feel good about that?

Why not worry about things going on in your city like gang issues, illegal drugs, riots, graffiti, the homeless, etc... Not things that help with the issues are country faces at this time. I understand wanting to phase out carbon issues but lets get real. Until California comes up with a way to provide electricity without rolling blackouts, creating electric vehicles that do not have exploding batteries, and to not tear up the Earth mining for the materials to create the batteries & using diesel guzzling equipment to do said mining this point is moot.

We will continue to need and use gas and oil and it is better to use what we produce in our country than rely on purchasing and transporting (via tanker ships that can dump in our oceans) to supply the U.S.

I am willing to make one offer, if you want, the City of L.A. can purchase my oil rights for \$500k and then you may do whatever you please with them.

Jack Upton

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:29 PM

To: Christina Upton <uptoncl@outlook.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CASE # CPC-2022-4864-CA Oil drilling in LA County

3 messages

jmwagoner via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 12:01 PM

Reply-To: jmwagoner@verizon.net

To: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.or, purplebb@social.rr.com, Mayor.helpdesk@lacity.org

Cc: ownerrelations@warrenresources.com

City of Los Angeles planning board:

We understand that you're planning to pass a regulation to end oil and gas operations in the county of Los Angeles on Tuesday, August 30, 2022.

Please Vote NO and **do not end oil and gas production in LA County**. Many people rely on these jobs for their livelihood, and we rely on the *income* from the production of oil from the property that we are involved in.

Oil is used in the production of so many products and to eliminate this product restricts the number of other products that can be produced.

We cannot go all electric with the power grids overworked and asking us to reduce electricity yet not continue to allow oil production in the city of LA.

Why would you want to eliminate the production of oil in LA County?

Please consider the impact that eliminating the oil and gas production in LA County would have on so many people and vote No on eliminating oil and gas production.

Thank you.

A concerned citizen.

Janet and Jim Wagoner

Case # CPC-2022-4864-CA

jmwagoner@verizon.net

Oils Email <planning.oildrilling@lacity.org>
To: jmwagoner@verizon.net, purplebb@social.rr.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:38 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>
To: jennifer.a.torres@lacity.org

Mon, Aug 22, 2022 at 2:38 PM



Address not found

Your message wasn't delivered to **purplebb@social.rr.com** because the domain social.rr.com couldn't be found. Check for typos or unnecessary spaces and try again.

[LEARN MORE](#)

The response was:

DNS Error: DNS type 'mx' lookup of social.rr.com responded with code NXDOMAIN Domain name not found: social.rr.com Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Final-Recipient: rfc822; purplebb@social.rr.com

Action: failed

Status: 5.1.2

Diagnostic-Code: smtp; DNS Error: DNS type 'mx' lookup of social.rr.com responded with code NXDOMAIN

Domain name not found: social.rr.com Learn more at <https://support.google.com/mail/?p=BadRcptDomain>

Last-Attempt-Date: Mon, 22 Aug 2022 14:38:51 -0700 (PDT)

----- Forwarded message -----

From: Oils Email <planning.oildrilling@lacity.org>

To: jmwagoner@verizon.net, purplebb@social.rr.com

Cc:

Bcc:

Date: Mon, 22 Aug 2022 14:38:39 -0700

Subject: Re: CASE # CPC-2022-4864-CA Oil drilling in LA County

----- Message truncated -----



Jennifer Torres <jenny.torres@lacity.org>

Case # CPC-2022-4864-CA

2 messages

'Sandy Wilson' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 10:58 AM

Reply-To: Sandy Wilson <swilson517@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Having recently received notification from Warren Resources regarding the City of Los Angeles eliminating oil and gas drilling I need to express my concern.

I feel you must be aware that many senior citizens have invested in companies such as this to provide royalties to supplement income in our retirement. Ceasing oil and gas drilling at a time when we have become dependent on foreign countries for these products only indicates the level of disregard you are showing for our country and the senior citizens.

I will not be able to attend the dog and pony show on August 30th but I would like to know who is going to be responsible for capping these wells and removing the derricks? I find it hard to believe you have the authority to put these companies out of business but it never ceases to amaze me the steps that California takes to destroy a once profitable and beautiful state. Shame on you.

Your response is requested.

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:48 PM

To: Sandy Wilson <swilson517@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

case #cpc 2022 4864 ca

2 messages

'tony ammirato' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 24, 2022 at 8:46 PM

Reply-To: tony ammirato <fermilee1920@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Jennifer Torres, Dept. of City Planning:

In reference to Case Number: CPC-2022-4864-CA, I would like to delineate my perspective as an Independent American Voter to the City of Los Angeles plans to ban oil and gas extraction. We can all agree that the eventual elimination of fossil fuels to attenuate the release of atmospheric greenhouse gas emissions is a critical issue. However, it is naive at best, or political grandstanding at worst to eliminate fossil fuels without commensurate steps to an equal increase in renewals to the electrical grid. Greenhouse gases know no geopolitical borders. Without a worldwide adherence to the elimination of these fuels and with Russia, China, India, increasing fossil fuel production, it is ludicrous to think this will have the minutest effect on a worldwide scale. Science has shown that wide-fires that have recently struck world wide, as well as volcanic activity will spew far more gases than that of anthropic emission. Again, extraction of fossils knows no boundaries, if we don't extract, it will be extracted somewhere else with those places becoming prosperous, at least until we can replace the grid with our own renewals.

I understand how California feels the need to set an example or "lead" the nation in the environment. However, we must put what is in the best interest of our nation when we are currently on the cusp of a potential world war that has the potential to devolve into a nuclear holocaust (talk about atmospheric pollution). Not to mention a recession with the transportation sector as a major component to the economic malaise we find ourselves in.

Finally, I suspect this will have no effect on your decision process, as I suspect you have already decided. I feel sorry for the retirees and low income people that have become dependent on those monthly royalty checks as well as the thousands of employees who will be out of work. Most of all, I feel that we are currently being lead by individuals that put politics and party affiliation (that includes both parties) ahead of doing what would make the USA the best country in the world.

Tony Ammirato
406 858 0221

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:10 PM

To: tony ammirato <fermilee1920@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CASE #CPC-2022-4864-CA

2 messages

Jim Brandt <jimbrandt39@gmail.com>
To: Planning.oildrilling@lacity.org

Sun, Aug 28, 2022 at 4:22 PM

Dear Ms. Torres

I urge reconsideration of this action to terminate oil extraction. This action will have an effect on the general price of gasoline let alone on the standard of living we have attained..

We are senior citizens living on limited resources in our "golden" years.
This action makes it impossible to replace this investment with other forms of income.

Please reconsider

Diane G. Brandt

Oils Email <planning.oildrilling@lacity.org>
To: Jim Brandt <jimbrandt39@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:00 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

case #CPC-2022-4864-CA

2 messages

MKM7@cox.net <MKM7@cox.net>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 9:29 PM

Hello,

I want to express my concerns regarding the impending attempt at cessation of oil and royalty income for property owners.

I have property in Wilmington, CA that has been in my family for decades. The royalty checks we receive have been something we rely on and have done so for a very long time.

I ask that you please reconsider this action as the income from mineral rights are important to many families and should not be taken away.

Thank you,

Mary Murat

(310)339-4028

Oils Email <planning.oildrilling@lacity.org>
To: MKM7@cox.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:43 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case number -- CPC-2022-4864-CA

2 messages

'thomas lesser' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 11:13 AM

Reply-To: thomas lesser <tmlesser@aol.com>

To: Planning.oildrilling@lacity.org

Cc: thomas lesser <tmlesser@aol.com>

Dear Jennifer Torres — I am a long time owner of oil rights and me and my family depend on this monthly income and definitely greatly oppose this proposal. I am sure there are many other owners who rely heavily on this monthly income as we do. Thank you. Tom Lesser

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:27 PM

To: thomas lesser <tmlesser@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864 -CA

2 messages

Cecelia Ruebel <merlot.rue34@gmail.com>

Fri, Sep 2, 2022 at 2:55 PM

To: Planning.oildrilling@lacity.org, Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

*Thank you.**Cecelia Ruebel*

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:17 PM

To: Cecelia Ruebel <merlot.rue34@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA - Please don't pass this ordinance.

2 messages

'Frank Towler' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 10:23 PM

Reply-To: Frank Towler <franktowler@verizon.net>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Dear Jennifer,

Regarding Case Number: CPC-2022-4864-CA, I respectfully request that you not eliminate oil and gas operations in the county of Los Angeles.

For those of us on a fixed income, it will be an extreme financial hardship especially considering the current inflation in every area of our lives. We depend on the Royalty Income as a significant part of our income. Please don't put additional financial pressure on us by passing this ordinance. Your help will be greatly appreciated.

Sincerely,
Frank Towler

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:46 PM

To: Frank Towler <franktowler@verizon.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

Robert Harding <harding1116@gmail.com>
To: Planning.oildrilling@lacity.org
Cc: Robert Harding <harding1116@gmail.com>

Mon, Aug 22, 2022 at 3:36 PM

Dear Elected and Appointed Public Servants:

Please do all in your power to rethink and reject this confiscatory policy. You are destroying income upon which my family and others depend for sustenance.

Thank you for your attention.

Robert Harding

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Robert Harding <harding1116@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:31 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

'J brian Putman' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 2:34 PM

Reply-To: J brian Putman <snickers1128@aol.com>

To: Planning.oildrilling@lacity.org

*Dear Jennifer Torres, Dept. of City Planning,****We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.******While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.******Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.******We urge you to reject this ordinance and work with our families to find a more balanced approach.******Sincerely,
J. Brian Putman***

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:35 PM

To: J brian Putman <snickers1128@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

jack.finefrock@gmail.com <jack.finefrock@gmail.com>

Mon, Aug 29, 2022 at 9:37 AM

To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

I have been alerted to the fact that you are considering the elimination of oil and gas operations in the County of Los Angeles. This is highly disappointing. I have had a small interest in Warren Resources for approximately 40 years and have been impressed by their operations. They have proven to be a quality company in the business of supplying affordable energy. Not only has Warren operated responsibly, they invest in the community through outreach programs. I recognize that California is looking to change their sources of energy, but it seems prudent to maintain existing reliable sources until the new sources are available and reliable.

I am a senior citizen and look forward to receiving my small, but helpful checks from Warren.

I trust that you will make an informed decision on this case and not simply follow the politics.

Sincerely,

Jack Finefrock

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:13 PM

To: jack.finefrock@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA Ban of oil & Gas drilling2 messages

CLAUDIA THOMPSON <artcjt@msn.com>

Tue, Aug 23, 2022 at 11:48 AM

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "Councilmember.buscaino@lacity.org" <Councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

Dept. of City Planning Jennifer Torres
Office of Councilman Joe Buscaino
Mayor Eric Garcetti

I am writing to you in regarding of a letter I received from Warren Resource with the request to not close down the production of oil, gas and new oil & gas production case number CPC-2022-4864-CA.

Banning new oil ad gas extraction and requiring the cessation of all existing oil and gas operations.

We have owned the oil right since approximately 1922, first my parents and now mine. Oil is very much needed as it was in winning wars as in the past.

You cant even run a windmill without oil and so much more.

We do not want you to shut down the operation of Warren Resources as it gives MANY people income and you tax money.

We request that you leave the production as is so people can have a income and not on welfare.

Respectively submitted

Mr. Arvid R. Thompson
8/23/2022

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:30 PM

To: CLAUDIA THOMPSON <artcjt@msn.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA Oil & Gas Drilling

2 messages

'Rgaone' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 10:20 AM

Reply-To: Rgaone <rgaone@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Hello,

I am writing to you regarding Case Number CPC-2022-4864-CA.

This concerns the immediate cessation of ALL existing oil and gas operations in the City.

A hearing on this matter is scheduled for Tuesday, August 30, 2022.

The City and State propose passing this proposal.

I have an idea that could be beneficial to all concerned.

Prohibit new drilling. But, allow oil and gas extraction to continue.

Prohibiting new drilling could satisfy some health and environmental concerns;

while allowing current extraction would help those of us who depend on that income, albeit as small as it is.

The Wilmington Field and the community of Wilmington is surrounded by notorious polluters such as the Ports of Los Angeles and Long Beach, several refinery operations, the 110 and 710 Freeways, the Alameda Corridor and the related truck traffic. Shutting down current extraction is not near the pollution caused by these other elements of the Wilmington area.

Many of us have generational mineral rights to the production from the Wilmington field.

For me and my family the amount of benefit is most likely miniscule compared to others who benefit.

Those few dollars help with our monthly expenses; that is important to those of us on fixed incomes.

Preventing drilling, but allowing current extraction, would help the environment, health concerns and give politicians a win.

And it would help the current holders of mineral rights keep needed income.

Another thing to consider. If this proposed ordinance passes would the City and State consider picking up the lost income for us that will lose it?

Linda Allebaugh

951-295-2950

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:19 PM

To: Rgaone <rgaone@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA Warren Resources, Inc.2 messages

Carol Miller <carol@ashtangayogacenter.com>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 9:21 AM

Dear Ms. Torres,

I just received a letter from Warren Resources Inc. regarding the impending elimination of oil and gas operations in Los Angeles County. I understand the environmental importance of developing and using alternative energy sources, and I support the banning of new oil and gas extraction, but I have a small interest in an existing oil well in south LA County and, although my monthly royalty is minimal (average \$300 per month), I need that check to help meet my living expenses. I imagine there are others in the same boat and would like to request that existing operations run by Warren Resources remain functioning.

Sincerely,

Carol Miller
Encinitas, CA
(760)815-4549

Oils Email <planning.oildrilling@lacity.org>
To: Carol Miller <carol@ashtangayogacenter.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:07 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case number CPC-2022-4864-CA

2 messages

'Patricia Lee' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 12:56 PM

Reply-To: Patricia Lee <shadow51mf@yahoo.com>

To: planning.oildrilling@lacity.org

Jennifer Torres

I truly cannot believe or understand why you would even consider stopping oil and gas operations in the county of Los Angeles when our country is already so dependent on foreign oil. This action will not only hurt the country but affect the income from all the employees these operations hire to run and maintain the equipment. I would not only lose a source of income but it will decrease the amount of oil and gas produced in the country and allow foreign groups to dictate how much fuel we get and how. I have

I request you stop these proceedings and allow the gas and oil companies continue to provide much needed income and fuel for our country.

Patricia Lee

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:40 PM

To: Patricia Lee <shadow51mf@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CASE NUMBER CPC-2022-4864-CA.

2 messages

PATRICIA TUCKER <pattuc61@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 10:37 AM

CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING
JENNIFER TORRES, DEPT OF CITY PLANNING

I AM WRITING IN REGARDS TO LETTER I RECEIVED TODAY. YOUR STOPPING TO DRILL AND SEND CHECKS WILL FINALITY BURDEN US. WE ARE ON A FIXED INCOME ND THESE ROYALTY CHECKS KEEP US AFLOAT. GAS PRICES ARE BAD ENOUGH AND THIS ACTION WILL JUST MAKE MATTERS WORSE. I SINCERELY HOPE YOU WILL RECONSIDER YOUR ACTIONS.

SINCERELY
PATRICIA TUCKER
CASE NUMBER CPC-2022-4864-CA

Oils Email <planning.oildrilling@lacity.org>
To: PATRICIA TUCKER <pattuc61@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:33 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4648-CA

2 messages

Ranga Ram Chary <rangaram.chary@gmail.com>
To: planning.oildrilling@lacity.org

Mon, Aug 15, 2022 at 4:33 PM

Hello!

I applaud the proposed oil and gas drilling ordinance. However, I hasten to add that it does not go far enough. Here are some suggestions for refinement of the ordinance.

1. All idle wells (some of which have been idle since 1910!) should be capped and sealed immediately. These sites should also become sites of reforestation/regeneration, so that we locally lower the temperatures, provide shade and natural habitat for wildlife/birdlife instead of the heat-islands which is what the well sites are. These sites should also become places for display of local art resulting in community enrichment rather than the eyesores that the wells are. Clever grading of the sites will also allow for rain water capture in small micro-reservoirs.

2. Companies should only be allowed 5 years to continue running active wells as is. After that, if they wish to continue running the well, they should take on a regeneration/reforestation of the region around the well to mitigate the carbon released from those products. This will allow the plants to mature over the remaining 15 years, so that at the end of the 20 year period proposed, each oil well will have a mature micro-forest around it.

3. If the companies give up the active wells after 5 years, it should be capped, sealed and added to the regeneration pool as described in item 1 above.

4. Some of the sealed oil well sites which are in appropriate locations should be converted to grid-tied solar generation facilities (with recycled solar panels) and battery storage facilities since they are located within the city and will have lower transmission losses than facilities located out in the desert for example. Microgrids of clean energy will accelerate the transition of the city to 100% clean energy.

regards,
Ranga Chary
West Los Angeles

Jennifer Torres <jennifer.a.torres@lacity.org>
To: Planning Oil Drilling <planning.oildrilling@lacity.org>
Cc: Ranga Ram Chary <rangaram.chary@gmail.com>

Tue, Aug 16, 2022 at 3:53 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.
[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA - Proposed Oil and Gas Drilling Ordinance2 messages

Irene Young <youngz@pacbell.net>

Mon, Aug 29, 2022 at 12:08 PM

To: Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org, Planning.oildrilling@lacity.org

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Irene Young

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:31 PM

To: Irene Young <youngz@pacbell.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA

1 message

Stephen Shoop <shoopsa@gmail.com>

Sat, Aug 27, 2022 at 2:40 PM

To: mayor.helpdesk@lacity.org, planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

Dear Mayor Garcetti, Ms. Torres, and Councilman Buscaino:

Although no longer a Los Angeles resident, LA is my hometown and where my family and I lived for many decades. My father was an aviation pioneer and executive, and an Air Force major general, at the time of his death the Commander of the California Air National Guard. My mother was a movie actress (Julie Bishop). Their generation, as well as those preceding and following, loved the city and invested in Los Angeles' economic development and success. This included investments in fossil fuels and exploiting this important resource for the benefit of the city, state, and country. In a city (and mismanaged state) where wokism, political correctness, and virtue signaling rule the day—and where brownouts remain a real risk-- they would have been appalled, as I am, at an irresponsible decision to ban oil and gas production.

By decreasing domestic fossil fuel production, will this ban help lower Angelinos' gas prices? Will it help in our country's energy independence and thus support our national security? Of course not. Will it win some woke votes and virtue brownie points? It quite probably will, so your agenda and priorities appear clear.

History will judge you and such a ban harshly. Renewables are great, but they're not ready to take up the slack caused by a premature abandonment of fossil fuels.

I urge you to oppose and defeat this irresponsible folly.

Sincerely,

Stephen A. Shoop, MD[103 Comforter Lane](#)[Clear Brook, VA 22624](#)shoopsa@gmail.com



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA

2 messages

Alison Fanning <aliwfang@gmail.com>

Sun, Aug 28, 2022 at 2:56 PM

To: Planning.oildrilling@lacity.org

Cc: "robhwhitley@gmail.com" <robhwhitley@gmail.com>, "jcfenergy@aol.com" <jcfenergy@aol.com>

Jennifer Torres, Department of City Planning**200 North Spring Street, Room 701****Los Angeles, CA 90012****Planning.oildrilling@lacity.org****(213) 978-3094**

Dear Ms. Torres,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:59 AM

To: Alison Fanning <aliwfang@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA

2 messages

Paul DelVaglio <pvaglio@sbcglobal.net>

Fri, Aug 26, 2022 at 3:21 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

Good Afternoon,

With regards to the above mentioned case I am writing imploring you to consider voting NO against the above action.

I am a self employed contractor and have been working for 31 years on my own. I have little to no retirement due to economic conditions over the past couple of years and poor planning & investments. My father left my brother and I a modest inheritance that I will be relying heavily on in the future. That inheritance is in the form of Oil Royalty Income from investments he made in the cities of Wilmington, Signal Hill and Long Beach. If the Cessation of Production is Immediately Banned I will be left without any means of support. This income is again modest and will allow me to continue to live in my home and provide assistance to my 2 Children that are entering college in the next couple years.

I am surely not the only Royalty Owner that will be relying on this income. Along with the countless people employed by the local oil producers. These producers have gone into the local communities and made serious efforts to clean up the areas they serve.

Thank You For Your Consideration
Paul A Delvaglio

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 12:24 AM

To: Paul DelVaglio <pvaglio@sbcglobal.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA

2 messages

Michael L Keith <mlk521@gmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 10:49 AM

Jennifer Torres, Department of City Planning
Los Angeles, CA 90012

Dear Ms Torres,

I write to you as a retired citizen who's retirement income is partially dependent upon royalties that my wife and I receive from oil well rights. I respectfully ask you to take into account as you discuss the cessation of all existing oil and gas operations in the City of Los Angeles citizens such as my wife and myself. If you decide to cease all operations, even the wells that have already been drilled and operating for dozens of years, you are affecting the livelihood of people who are dependent on income from existing wells.

Thank you for taking into consideration my expressed concern.

Sincerely,

Michael L. Keith

Michael L. Keith
(253) 948-7550
mlk521@gmail.com

Oils Email <planning.oildrilling@lacity.org>
To: Michael L Keith <mlk521@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:33 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA, City of Los Angeles to Ban Oil and Gas Drilling2 messages

J Parker <sequinparker@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 4:24 PM

Attention: Jennifer Torres, Department of City Planning

Dear Ms. Torres:

After spending almost my entire life in California, I have lived a wonderful life in the pursuit of happiness and liberty, never thinking that I would be suppressed by my state and federal government to eliminate oil and gas operations in the County of Los Angeles.

This is the worst idea ever hatched by LA City and/or anyone who claims to be of sound mind and concern for fellow citizens. You have not thought this through to the next thirty years and longer. We cannot stop the drilling and production of energy in this year or the next thirty years, without creating chaos throughout this city, county and state, let alone the U.S.A.

The majority of our citizens cannot afford to change their automobiles over to electric energy immediately, nor until they can afford it for the next ten to thirty years. You are not being fair or honest to rapidly remove our ability to fill our automobile gas tanks or heat our homes with natural gas nor dry our clothes or cook our meals without natural gas. You mock the general citizens by saying, "let them go without gas or oil and they will quickly change over to electrical energy". NONSENSE! Struggling citizens of LA City and County are hanging on by the skin of their teeth to pay for groceries and rent, not to mention automobile gasoline.

Where is freedom to make a living without transportation to a job? You are doing great damage to California if this goes through, especially low incomers. Senior citizens are now going back to work to be able to afford their home heating in the winter.

When it comes to producing a sustainable and plentiful supply of energy, the U.S. has a huge and utterly under-appreciated advantage over other nations. Here, individuals and companies are allowed to own mineral rights.

Sincerely,

Kenneth F. Parker
kfparker@aol.com

Oils Email <planning.oildrilling@lacity.org>
To: J Parker <sequinparker@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:17 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CASE NUMBER: CPC-2022-4864-CA

3 messages

'DENNIS DE BRITZ' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 20, 2022 at 4:19 PM

Reply-To: DENNIS DE BRITZ <kegc33@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

RE: CASE NUMBER: CPC-2022-4864-CA

I'm a retiree living on social security and my royalty revenue from Warren Resources Wilmington township.

I can not fathom this proposal. Gas prices are at an all time high. Which is going to more than likely place us in an upcoming recession. Instead of making us energy independent this proposal will cement us on total dependence of foreign oil.

What is this administration doing to lower taxes, repair infrastructure, address the homeless situation and promote business instead of curtailing and driveing business away?

Should this proposal go through there will be legal action!

DENNIS DEBRITZ

'DENNIS DE BRITZ' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 20, 2022 at 7:13 PM

Reply-To: DENNIS DE BRITZ <kegc33@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, mayor.helpdesk@lacity.org

RE: CASE NUMBER: CPC-2022-4864-CA

I'm a retiree living on social security and my royalty revenue from Warren Resources Wilmington township.

I can not fathom this proposal. Gas prices are at an all time high. Which is going to more than likely place us in an upcoming recession. Instead of making us energy independent this proposal will cement us on total dependence of foreign oil.

What is this administration doing to lower taxes, repair infrastructure, address the homeless situation and promote business instead of curtailing and driveing business away?

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:24 PM

To: DENNIS DE BRITZ <kegc33@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA.

2 messages

trilobite@suddenlink.net <trilobite@suddenlink.net>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 10:04 PM

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Chester Mohr

Oils Email <planning.oildrilling@lacity.org>
To: trilobite@suddenlink.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:52 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case# CPC-2022-4864-CA

2 messages

kalbrigh@ix.netcom.com <kalbrigh@ix.netcom.com>

Thu, Aug 25, 2022 at 1:38 PM

To: planning.oildrilling@lacity.org

Cc: kalbrigh@ix.netcom.com

Jennifer Torres

Department of City Planning

[200 North Spring Street, Room 701](#)[Los Angeles, CA 90012](#)

Dear Jennifer Torres,

I am writing you today about the above case # CPC-2022-4864-CA. I was just notified by Warren Resources of your movement into trying to take away royalty income from my family, which is totally unacceptable!

Who in their right mind, given the existing supply chain issues with oil and gas, our depleted strategic national reserves, and the effects of skyrocketing heating and cooling costs on the poor would even think of eliminating oil and gas operations in the County of Los Angeles??

My family, dating back to my Great Grandmother, agreed 90 years ago to have their properties devalued so that oil drilling rigs could pump oil from their properties. They understood that this was needed for the U.S. Economy as well as National Defense that would in turn, provide a steady stream of income to their families. Now, after 90 years, you are thinking of **unjustly** taking these royalties away from our families and children to come??

I strongly suggest you reconsider your actions as it appears you have clearly not thought of all the people that this would affect for some politically driven agenda. I am sure I speak for many, where I can say that if you intend on pursuing this matter further, I fully expect a whole slew of new law suits which would, at a minimum, include compensation for each and every property owners heirs for 90 years of devalued property values!

Regards,

Kris Albright

Cell – (303) 881-1508

kalbrigh@ix.netcom.com

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:50 PM

To: kalbrigh@ix.netcom.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

cessation of ALL oil and gas extraction within LA city limits

2 messages

steven meeks <meeksmusic@hotmail.com>

Wed, Aug 31, 2022 at 11:42 AM

To: Los Angeles City Planning <planning.oildrilling@lacity.org>

Cc: steven meeks <smeeks.wanc@gmail.com>

Hello,

I think this is a great idea hopefully to be mandated into law. Though it's long overdue, 20 years is far too long for complete removal.

What about all the capped wells that have been and still are leaking after all these years? What about any and all environmental contamination? How will clean up be monitored while this slow 20 year removal process takes place? I'm especially speaking in reference to the huge Inglewood Oil Field in the Baldwin Hills Range.

Those of us who are intelligently informed know that, more often than not, companies walk away carte blanche from practically ALL responsibility for the environmental contamination / health degradation they have caused. Owners/shareholders get rich, are not held liable nor do they suffer from all the harm they helped to cause.

These oil companies I would imagine have already made profits on their bounty. If that's the case and the City of Los Angeles has done ALL the math, why give these companies 20 years? Are these companies saying that it will take them 20 years (+?) to recoup their investment? Who worked out the math, the \$\$/financial figures?

What about the publicly owned underground storage facilities in Playa del Rey and Aliso Canyon? Why continue to keep them in operation?

Steven Meeks

Excuse any typo's, this device has a mind of its own

Thanks

Steven

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:10 PM

To: steven meeks <meeksmusic@hotmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commision on September 22, 2022. The final City Planning

Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Cessation of Gas/Oil extraction in the city of LA

2 messages

Barbara Vaughn <bavaughn7@gmail.com>
To: Planning.oildrilling@lacity.org

Wed, Aug 24, 2022 at 12:05 PM

Attention: Jennifer Torres, Department of City Planning
Case # CPC-2022-4864-CA

We received notification from Warren Oil that LA city is trying to stop drilling on new and existing oil/gas wells in the County of Los Angeles. I am writing to ask you not to pass this ordinance as these wells have been in our family for over 100 years and would affect our income. I am retired on social security and this royalty I receive provides me with an extra source of income. Please DO NOT endorse this ban. Thank you for your help in this matter. Sincerely-Billings J. Vaughn
[18108 W. Willow Drive, Goodyear, AZ 85338](#)-email bavaughn7@gmail.com

Oils Email <planning.oildrilling@lacity.org>
To: Barbara Vaughn <bavaughn7@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:03 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Cessation of oil and gas drilling in LA

2 messages

Dixee Partee <dap020509@gmail.com>

Thu, Aug 25, 2022 at 11:37 AM

To: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

I received a notice regarding the City of Los Angeles plan to ban drilling operations in LA county.

This action concerns me as a stockholder in Warren Resources, but disturbs me more when no reason for this action was stated or the duration of this action indicated.

If your action is to benefit the environment, then it needs to be stated loud and clear.

At this point in time with the information provided, I would NOT support your actions.

Dorothy A. Partee
51694 SE 4th St.
Scappoose, OR 97056

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:40 PM

To: Dixee Partee <dap020509@gmail.com>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Cessation of Oil Drilling in Los Angeles County

2 messages

Don Patino <drp5408@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 1:57 PM

Dear Ms. Torres

My name is Donald Patino. I grew up in Wilmington, California and lived for many years next to an oil drilling rig and two huge oil tanks. Every few weeks trucks came in to pump out oil. My family has received royalty checks for that oil since 1940. We never made a lot of money from the oil, but it did help with our expenses.

I think ending oil production in L.A. is rather shortsighted. At this stage of my life, I can get by without the oil revenue. However, it looks to me that California may not be able to count on entirely renewable energy into the near future, by 2035? If we put, say 50,000,000 electric vehicles on the road by that date, will there be the electrical infrastructure to charge them all? That is now in doubt. I am sure you are aware of the severe drought conditions in the state. This may not be a short term condition if this drought is the result of climate change. Yes, we can take gas powered vehicles off the roads, but can we really take millions off by 2035 or even many years after that. Vehicles, including big rigs, will still be entering the state as well as those by visitors from other states and counties. It looks like we may not be able to rely on hydroelectric power or nuclear power plants. Where will the power come from for all of these electric powered vehicles? I hear hydrogen powered vehicles are also in the mix, but I see no infrastructure for those at all.

Is L.A. planning to cut itself off from the rest of the state and country? If so, this will not work. I agree we need clean reliable sources of energy, but I don't see this happening in L.A. The biggest source of power we have is just off of our coast, wave power from the sea. Are there plans to use this? I have not heard of any in this country. Until we have other sources of energy, we should not eliminate a tried and true source of power.

Sincerely

Donald Patino

Oils Email <planning.oildrilling@lacity.org>
To: Don Patino <drp5408@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:10 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of LA Ban on Oil Drilling Case CPC-2022-4864-CA

2 messages

D. Duran <phantomphan1974@gmail.com>

Mon, Aug 29, 2022 at 10:11 AM

To: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

I am writing you in opposition to the proposed ban on oil drilling on the City of Los Angeles. For some Angelenos this is an extra source of money from royalties of those that quality. That extra money can help with higher rent, higher gas, food and living costs. It has been done safely for years and shouldn't end. We depend so much on foreign oil yet discourage the use of our own. I am one of those people that get those checks. They are not big at all but it means 2 full gas tanks or a trip to the market or helping a family member with their student debt.

So I implore you to not go ahead or endorse this oil drilling ban (Case Number CPC-2022-4864-CA)!!! Don't hurt those that will be effected by this and help meet America's energy demand.

V/r

--

Damon Duran / Co-Founder www.ApSoCal.com**Orange County Sheriff's Dept Air Support Unit-Photographer****Phantomphan1974 Photography**<https://www.flickr.com/photos/phantomphan1974photography/>**310-528-2704**

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:14 PM

To: "D. Duran" <phantomphan1974@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of LA to ban oil and gas drilling

2 messages

Peter Herrera <snofre73@gmail.com>

Tue, Aug 30, 2022 at 7:39 PM

To: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, Mayor.helpdesk@lacity.org

Case Number: CPC-2022-4864-CA

Jennifer Torres, Councilman Joe Buscaino, Mayor Eric Garcetti,

Please reconsider the City of Los Angeles Ban on Oil and Gas Drilling. I understand the need for alternative fuel and power sources. Electric vehicles have a place in the future but I don't believe they should be the only option. Gas and electric vehicles together I believe would have less effect on the environment.

I do have mineral rights that I depend on as I'm retired on a fixed income. It's not a lot but it does help and I believe there are many more like me who rely on mineral rights to supplement their income.

Thank You

Sincerely

Peter Herrera

snofre73@gmail.com

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:03 AM

To: Peter Herrera <snofre73@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of Los Angeles Ban Oil Drill

2 messages

Nancy Ronconi <naronconi@gmail.com>

Tue, Aug 30, 2022 at 5:09 PM

To: Planning.oildrilling@lacity.org, Councilmember.buscaino@lacity.org, Mayor.helpdesk@lacity.org

Hi Jennifer,

Case#CPC-2022-4864-CA

Dear Committee Members,

I appreciate all the time you have put into considering oil banning in Los Angeles. I am asking you to vote No against the ban. California is rich with resources and the oil drilling and harvesting is what contributes to our economy, the functions of our cities and our livelihood. There are thousands of Americans that depend on this valuable resource and would be grossly hurt if it stopped.

I know you are concerned with our environment as am I. I truly believe that our oil resources do less harm to the environment than ultimately battery operated cars. The dead batteries produce more toxins and create an enormous problem with disposing of them. Also, I want to mention that the need for electricity is already being challenged. There are rolling blackouts that affect us greatly now and that doesn't include the impact of all electrical cars.

I strongly ask and encourage you to Vote No against the Ban on Oil Drilling.

Sincerely,

Nancy Ann Ronconi

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:59 AM

To: Nancy Ronconi <naronconi@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of Los Angeles to Ban Oil and Gas Drilling

2 messages

'Rachel Flores' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sun, Aug 28, 2022 at 2:46 PM

Reply-To: Rachel Flores <ravin6366@yahoo.com>

To: Oils Email <planning.oildrilling@lacity.org>

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Rachel Flores

Wilmington Resident

[Sent from Yahoo Mail on Android](#)

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:58 AM

To: Rachel Flores <ravin6366@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of Los Angeles to ban oil and gas drilling

2 messages

Pam Holtgren <pam.holtgren@gmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 1:10 PM

Dear Ms. Torres,

I am sending this message to you in regards to a letter I received from Warren Resources. They have informed me that my royalty income will be coming to an end when the drilling stops. I am so sorry to hear this as we have had this in our family for generations. They have encouraged me to reach out to you to give comments and feedback.

I would appreciate if you could keep me up to date in regards to this situation.

Thank you,
Pamela Flores

813 Cannonade Dr.
Whitsett, NC 27377
703-598-9229

Oils Email <planning.oildrilling@lacity.org>
To: Pam Holtgren <pam.holtgren@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:11 PM

Hello,

Thank you for your interest in the Oil and Gas Drilling Ordinance. Your contact information has been added to the Interested parties list and you'll be notified of the progress of the Oil and Gas Drilling Ordinance. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.



Jennifer Torres <jenny.torres@lacity.org>

City of Los Angeles to ban oil and gas drilling

2 messages

Steve Cross <stevencross1960@gmail.com>

Thu, Aug 25, 2022 at 6:48 PM

To: "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, planning.oildrilling@lacity.org

Dear Sirs:

We own property interest in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil and Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objectives of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to the local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests-or the fact that we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Regards,
Steven T. Cross

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:14 PM

To: Steve Cross <stevencross1960@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City of Los Angeles to ban oil and gas drilling

2 messages

'Marsha Rosenbarger' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 9:45 AM

Reply-To: Marsha Rosenbarger <n6snwmarsha@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayer.helpdesk@lacity.org" <Mayer.helpdesk@lacity.org>

Dear Jennifer Torres, Joe Buscaino, and Mayer Eric Garcetti,

This is in response to a letter my husband and I received from Warren Resources regarding our Royalty income from the drilling of oil and gas resources. The first thought I had was the foreboding consequences this country will face if indeed we have a world issue and we can no longer depend on other countries to sell us oil and gas products. We can and should be independent with our own resources right here. I never could understand why we shut down our pipeline and immediately put the call out to the world that we needed to buy these products? Los Angeles has been drilling way before the 1920's and has a good track record for safety. Petroleum products are required in so many other products that we use in our everyday life and not just gas or diesel for cars and trucks. Going electric is on the forefront and I get that. However these oil and gas products are still needed to produce some of that electricity whether we like it or not. The best hack I saw was a gas generator running so an electric car could be charged.

It is my opinion that banning all of the oil and gas drilling in Los Angeles and elsewhere is not in the best interest of this country.

Rod and Marsha Rosenbarger

ki6fhrod@gmail.comn6snwmarsha@yahoo.com

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:16 PM

To: Marsha Rosenbarger <n6snwmarsha@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING CASE NUMBER CPC-2022-4864-CA

2 messages

terrytassin@cox.net <terrytassin@cox.net>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 2:17 PM

August 23, 2022

Jennifer Torres, Department of City Planning
[200 North Spring Street, Room 701](#)
[Los Angeles, CA 90012](#)

Re: CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING
CASE NUMBER CPC-2022-4864-CA

Ms. Jennifer Torres,

I was recently informed that the City of Los Angeles is considering banning oil and gas drilling.

I would like to address this issue with my story. Approximately 60 years ago my father George S. Brownell and some of our neighbors were approached with an offer to do underground drilling for oil. He then would receive a royalty for that oil. At that time, we were living at [1251 Cary Ave, Wilmington, CA](#).

After my father passed away my mother, Wilhelmena W. Brownell, received that royalty. My mother had a Living Trust and in that trust, she named me as her Successor Trustee. As a result, at the time of her death I would start receiving a royalty from the oil. Since her passing, I have been receiving a royalty check four times a year.

I am now 77 years old and I rely on those checks to supplement my other income to live.

I hope you will consider this information and vote **NO** on banning oil and gas drilling.

Sincerely,

Frances J. Tassin

4333 W. Echo Lane

Glendale, AZ 85302

Email: terrytassin@cox.net

Oils Email <planning.oildrilling@lacity.org>

To: terrytassin@cox.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:37 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING2 messages

'David Crosby' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 24, 2022 at 4:12 PM

Reply-To: David Crosby <dlclrc@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

August 24, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

RE: CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING
Virtual Presentation and Public Hearing
Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

I have been informed that the City of Los Angeles is taking steps to eliminate oil and gas in the county of Los Angeles.

I would like to say that we and other royalty holders depend on the income from Warren Resources as part of our retirement. I am sure many others are in the same situation.

Think of all the employees that you will put out of work. Think of the taxes the county will lose.

Transition to renewables is going to take time. Oil and gas are so vital for our economy. The list is very long.

Please reconsider the ban.

Respectfully,

David L. Crosby

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:08 PM

To: David Crosby <dlclrc@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comment on CPC-2022-4648-CA

2 messages

Ann Dorsey <aedorsey@hotmail.com>

Sun, Aug 21, 2022 at 2:44 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

To Whom It May Concern:

I am writing to express my support for the proposed Oil Ordinance which will amend the Los Angeles Municipal Code to prohibit all new oil and gas drilling activities and make any existing extraction a nonconforming use in all zones of the City.

Given the know harmful impacts of oil and gas extraction on people's health and the environment, this ordinance is a necessary step towards equity and mitigating the climate crisis.

Thank you,

Ann Dorsey

[18042 Schoenborn Street #5](#)

Northridge, CA 91325

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:29 PM

To: Ann Dorsey <aedorsey@hotmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comment on oil

2 messages

Dave Stone <davestone1902@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 10:56 AM

How many non ideological experts did you speak to before trying to do this ban?

Name the experts.

Are you aware that we need energy in order to sustain ourselves?

I don't believe the "communities of color" disparities bullshit that you virtue signal about. That's nonsense. Pollution affects people of all races and must be addressed. You must stop dividing people by race.

If you ban oil, what will you do to increase natural gas? Nuclear?

How will you ensure enough energy?

AC usage will only increase over next decade. We need the energy. A ban of oil seems like it could have negative impacts on energy. The burden should be on you to prove it doesn't.

Oils Email <planning.oildrilling@lacity.org>
To: Dave Stone <davestone1902@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:39 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comment

2 messages

Arielle Basich <arielle.basich@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 12:17 PM

Hello,

I've been a citizen of Los Angeles for all my life, and this is my first time submitting a comment to a proposed ordinance. Exciting!

I am writing to say that I am in favor of the future ban on oil and gas extraction within Los Angeles, and rezoning of the city to prohibit it. Although we have our history as a city in it, it is time to look for the future and focus on other energy sources that won't disadvantage or harm Angelenos - especially disproportionately Angelenos of modest means.

I understand the need for an amortization period, and that it is stipulated by the LA Municipal Code. However, 20 years does seem very long, given the urgency of health matters as well as the climate crisis.

Anyway, thank you for your time.

Sincerely,
Arielle Basich

Oils Email <planning.oildrilling@lacity.org>
To: Arielle Basich <arielle.basich@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:23 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

comments on draft oil ordinance

2 messages

Michael Salman <salman@history.ucla.edu>

Tue, Aug 30, 2022 at 4:53 PM

To: planning.oildrilling@lacity.org

Cc: lilian.rubio@lacity.org

To the LA Department of City Planning Oil Regulation Unit

Below is an analysis of some (but not all) of the major problems in the proposed draft ordinance. It has been shared with hundreds of community members who have been involved in multiple oil drill site cases.

The analysis refers to SB 1137, which is being voted on by the State Assembly tonight and will be brought to the floor of the State Senate tomorrow. Passage is uncertain, especially coming down to the end of the legislative session tomorrow at midnight. If passed, it would prohibit drilling, redrilling, and reworking of oil wells within 3200 feet of sensitive land uses. "Reworking" is a term for certain kinds of projects that must be approved by CalGEM; it is defined in the State's Public Resources Code, so it has clear and specific meaning. SB 1137 would use existing inspection and enforcement mechanisms at CalGEM, and build upon them. It would be effective. In those ways it is strikingly different from Planning's proposed ordinance, as the analysis below details.

Yours,

Michael Salman
Professor Emeritus
History, UCLA

This is an update about the draft City ordinance that was proposed by the Los Angeles Department of City Planning on August 9, 2022.

We will first will give you the links to the Planning Department's proposal and describe the long timeline for action and input. Then in the following sections we will show you the problems with the proposed draft ordinance.

Our presentation of the flaws and dangers of the proposed City ordinance is long. But it is about whether communities want 20 years of increased chaos and hazards at oil drill sites. It is much quicker to do good things now than to live through a 20 year nightmare.

1) The Planning Department has created a couple of web pages with information about its proposed draft ordinances.

A link featured on the [Planning Department's home page](#), takes you to an [August 9, 2022 press release announcing the proposal](#). The press release has a link to the proposed draft ordinance and a link to a "fact sheet."

The Planning Department also set up a [separate web page for the proposal](#) that includes links to the proposed draft ordinance and information about public meetings that will be held by the Planning Department.

Later this fall, Planning intends to submit the proposal to the City Planning Commission, which would hold a formal hearing to decide on whether to recommend the proposal to City Council.

City Council would hold its own hearings on the proposal.

The Planning Department is holding a public meeting tonight, at 6PM. The [notice of the event is here](#).

Planning is calling it a "public hearing," but it seems to be only an information and comment meeting rather than a formal public hearing run by a decision maker.

It is important to remember that only City Council can enact ordinances. City Council meetings on this proposal, if they happen, will be far in the future.

- There are additional major steps of study and review that would be necessary before City Council could act on the proposal.
 - The City Council has been voting to request reports and studies and drafts related to possibly phasing out oil wells in the City since 2017. Here is the Council File that has most of that record: [CF 17-0447](#).
 - On November 17, 2020, Deputy City Attorney Jennifer Tobkin told a City Council committee that the City Attorney would defend a prospective phase out of oil wells by amortization based on a "a strong administrative record which includes expert amortization studies and proper environmental review." She told the committee that "environmental review under CEQA would . . . have to be performed." The audio recording of the committee is here, relevant part starts at 1:59:00 (https://lacity.granicus.com/MediaPlayer.php?view_id=103&clip_id=20391)
 - No environmental review has been performed.
 - Last year the City appropriated \$3.5 million to hire outside firms to conduct amortization studies on several drill sites, not all of them. The studies were expected to take up to three years to complete. It is not clear how many have been started.

2) At first glance, the proposed draft ordinance from the Department of City Planning looks like SB 1137, but that is more illusion than reality.

The proposed draft ordinance says that it would:

- Prohibit drilling of new oil wells throughout the City.
- Prohibit the redrilling of existing oil wells throughout the City.
- Prohibit the "maintenance" of existing oil wells throughout the City.
- And declare all existing oil wells throughout the City a "nonconforming use" that will be amortized out of existence and "completely removed" within 20 years.

We will address each of those points to show that the proposed ordinance promises things it cannot deliver. Then we will show you that it proposes to actively destroy the protections and tools in the City Code that have been used successfully to rein in oil companies and to close drill sites & get all of their wells plugged.

Before we begin, remember that the Department of City Planning is the home of the Zoning Administrator. The sections of the City Code that the Planning Department proposes should be changed are in the Zoning Code. The Zoning Administrator's failure and refusal to implement and enforce the Zoning Code is at the root of the problems at the West Pico Drill Site, alongside the Zoning Administrator's failure and refusal to implement CEQA's requirements of environmental review.

Unlike SB 1137, the proposed draft City ordinance comes with no preexisting inspection and enforcement system, and it does not propose creating one. In fact, the Planning Department says it is not necessary. That is a fatal flaw. Here is why.

- Saying that something is prohibited while providing no means to enforce the prohibition is the definition of ineffective.
- The "fact sheet" issued by the Planning Department says a frequently asked question is, "Who will ensure that operators stop drilling and properly remove their oil wells after the amortization phase?" The "fact sheet" offers this answer: someone else, mainly agencies at the State level that do not and cannot enforce local City Code. There is no plan for inspection, monitoring, or enforcement of City Code.
- The City dropped the ball on developing a general compliance and enforcement program after a September 2018 City Council vote to establish such a program by ordinance. This was exposed on the [front page of the LA Times on April 20, 2021](#). There is still no inspection ordinance and no inspection program.
- ***But here is the bigger rub. Ending the legal drilling and redrilling of oil wells in the City is practically a non-issue:***
 - Existing City Code requires an oil company to apply to the ZA for approval to drill, redrill, or convert an oil well. The ZA can deny the application.

- The last time the ZA issued an approval for an application to drill a new oil well was in September 2007, for the Murphy Drill Site in CD 10.
- The last time the ZA issued an approval to redrill an existing oil well was in August 2014, for the San Vicente Drill Site in CD 5 (where Council Member Koretz signaled his assent to the project, as noted in the ZA's determination).
- ***It has been 8 years since an oil company has obtained a ZA approval for an oil well redrilling project and 15 years since a ZA approval for a new well.***
- Community opposition and opposition from the local City Council Member would almost certainly lead to a denial of a new application. Here is an example:
 - From 2014 to 2016, the community surrounding the Murphy Drill Site in CD10, with support from then CD10 Council Member Herb Wesson, fought back when the ZA was going to allow installation of a gas burning flare. An initial approval was set aside. A new review was held. And in June 2016 the ZA denied the application to install the gas burning flare.
- ***As we know from the West Pico Drill Site case, the real problem is that oil companies have been drilling new wells, redrilling existing wells, and converting wells without submitting the required applications to the ZA for approval, and the City does not stop them because the City does no general compliance inspections, no monitoring, and no enforcement (unless the public forces the City to do it).***
 - The problem is not unique to West Pico.
 - On June 3, 2022, the LA Times published an article about the City's largest drill site, in the Wilmington section of the City, where multiple oil well projects have been executed without the required applications to and approvals from the City's ZA. The Times article reported on US Representative Nanette Barragan hosting a press conference to publicize the problem. The Planning Department said they would open a review and hold a public hearing, but they have not done so.
 - We told the ZA's office about these problems at the drill site in Wilmington in fall 2020, a year and a half before the LA Times article, but they the ZA's office still has not acted.
 - The necessary step to stop illegal oil drilling is to do inspection and enforcement.

3) The proposed ordinance's prohibitions against drilling and re-drilling will do nothing.

What about the prohibition against "maintenance"?

- The proposed ordinance does not define the words "maintain" or "maintenance," and they are nowhere defined in existing City Code.
- The Planning Department's "fact sheet" says a frequently asked question is, "Can operators maintain their wells during the amortization phase?" And then it provides this answer:
 - "Well servicing activities such as replacement of tanks, appurtenant structures, and equipment would not be affected by this ordinance. Maintenance activities such as, but not limited to, acid treatment, reworking, and sidetracking would not be permitted once this ordinance becomes effective."
- But none of that is defined in the proposed ordinance nor anywhere in existing City Code.
 - "Maintenance" has no specific meaning in industry practice nor in City law. It means everything from sweeping the floor to replacing seals & gaskets to prevent leaks, to using acids to clean oil well casing perforations. It means everything and thus it means nothing.
 - Even if the Planning Department created inspections and enforcement mechanisms, it could not enforce such a vague and undefined prohibition.
 - The authors of the "fact sheet" do not seem to realize that "sidetracking" is, in fact, redrilling an existing well in a new lateral direction.
 - This is one of many indications that the proposed draft ordinance has been rushed without study, without knowledgeable input, and without due care.

4) The proposed ordinance's promise that all oil wells will be "entirely removed" by the end of a 20 year amortization time period also comes with no mechanism for enforcement and no plan for making sure that the wells are plugged by the oil companies.

But don't let that fool you. The proposal is actually emptier and more dangerous than that.

- We trust you are by now familiar enough with the lack of inspections, monitoring, and enforcement being the taproot of almost all other problems.
- So let's look at the 20 year promise:
 - Governor Newsom has already set a target date of 2045 for the phase out of the oil extraction industry in California.
 - More importantly, the State just approved regulations that forbid the sale of new gasoline powered cars starting in 2035, and require the further acceleration of electric and fuel cell electric vehicle sales starting in

2026.

- The Federal government just passed President Biden's "Inflation Reduction Act," which includes large incentives for automakers to retool to make electric vehicles and expand tax credits for buying new and used electric vehicles.
- As the vehicle fleet in California accelerates in its transition away from use of gasoline and diesel fuels, demand for oil in California will drop steeply and oil wells in California will trend toward being unprofitable.
- **In roughly 20 years, production at oil wells in the City of Los Angeles is highly likely to end even if the City does nothing. But the proposed ordinance from the City Planning Department is much worse than just an empty promise.**
 - The smaller issue is the lack of attention to the difficult problem of how to get oil wells plugged. Smaller is a relative term. It costs an average of \$330,000 to plug a recently used oil well in the City. There are about 1,100 active and idle oil wells in the City with extant owners that should pay to plug the wells. There are another almost 1,000 wells that need updated plugging, most of which have no extant owners and many of which could be very expensive to plug.
 - The City should have already learned from its handling of the infamous AllenCo operated Drill Site in University Park, where all of the wells have been degrading since the end of 2013, with no prospect of getting the wells plugged anytime soon.
 - Environmentalists and regulators know that getting oil and gas well owners and mine owners to clean up after they close business is extremely difficult because the responsibility to plug wells, fill mines, and do clean-up can be discharged (i.e., wiped out) in bankruptcy.
 - The City has just had an object lesson about this danger in the case of the Exide Battery recycling plant in the Vernon/East Los Angeles area that contaminated several square miles with lead. The clean up cost is approaching \$1 Billion. Exide's liability was erased in bankruptcy. Exide is an example of a business that can shut down and then do no clean up.
 - **The bigger and more dangerous problem is that the proposed draft ordinance would delete almost all of the safety and environmental protections applied to oil wells in the Zoning Code, and it would delete almost all of the tools that the public and concerned Council Members have used to force effective action.**

5) We have saved the worst for last.

While the proposed ordinance would insert a few ineffectual words into the City's Zoning Code promising to prohibit new wells, redrilling, and "maintenance," and a few words promising that all oil wells will disappear in 20 years - all without any inspection and enforcement mechanisms - the proposed ordinance would do something far worse.

The proposed ordinance would delete almost all of the existing Zoning Code regulating the oil industry.

It would throw into the trash bin almost all of the City's laws offering safety and environmental protections.

It would destroy almost all of the tools that communities have used in recent years to rein in oil companies at a couple of drill sites and to successfully close two drill sites and achieve the plugging of all of their oil wells.

Here is some of what has been accomplished by communities:

- In 2014-16, the community around the Murphy Drill Site in CD 10 used the protections and tools in the City's Zoning Code regulating the oil industry to prevent installation of a gas burning flare.
- In 2015-2017, the community around the 4th Avenue Drill Site in CD 10, with the allegiance of Council Member Herb Wesson, used those protections and tools to obtain the plugging of all oil wells and the closure of the drill site (completed in 2018), which was adjacent to a public elementary school.
- In 2017-2018, the community around the Jefferson Drill Site in CD 8, with the allegiance of Council Member Marqueece Harris-Dawson, used those protections and tools to obtain the plugging of all oil wells (completed circa 2020) and the closure of the drill site.
- In 2017-2019, the community around the Rancho Park Drill Site in CD5 used those protections and tools to prevent installation of a gas burning flare.
- 2019 to present, the community around the West Pico Drill Site in CD5 has been using those protections and tools, and we think in the end we can secure the plugging of oil wells.

The City's largest drill site in the Wilmington section should be next. The Department of City Planning has told the LA Times and others that it will hold a ZA review to look at compliance

violations. But now the Department of City Planning is proposing to throw out those protections and tools.

Look at the proposed draft ordinance. Almost all of it is composed of striking out and deleting text from Section 13.01 of the Zoning Code.

Here are some samples from the proposed draft ordinance of what it plans to delete:

From 13.01.E.2:

~~(i) A Zoning Administrator may impose additional conditions or require corrective measures to be taken if he or she finds, after actual observation or experience with drilling one or more of the wells in the district, that additional conditions are necessary to afford greater protection to surrounding property.~~

From 13.01.F:

~~1. That all pumping units established in said district shall be installed in pits so that no parts thereof will be above the surface of the ground.~~

~~2. That all oil produced in said district shall be carried away by pipe lines or, if stored in said district, shall be stored in underground tanks so constructed that no portion thereof will be above the surface of the ground.~~

~~3. That the operator of any well or wells in the district shall post in the Office of Zoning Administration a \$5,000 corporate surety bond conditioned upon the faithful performance of all provisions of this article and any conditions prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator, or change of specifications or requirements that may be approved or required by him or her or by any other officer or department of the City, or other alteration, modification or waiver affecting any of the obligations of the grantee made by any City authority shall be deemed to exonerate either the grantee or the surety on any bond posted as required in this article.~~

~~9. That no refining process or any process for the extraction of products from natural gas shall be carried on at a drilling site.~~

~~18. That all production equipment used shall be so constructed and operated that no noise, vibration, dust, odor or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall ever be permitted to result from production operations carried on at any drilling site or from anything incident thereto to the injury or annoyance of persons living in the vicinity; nor shall the site or structures thereon be permitted to become dilapidated, unsightly or unsafe. Proven technological improvements in methods of production shall be adopted as they, from time to time, become available if capable of reducing factors of nuisance or annoyance.~~

Those are just a few examples. Here is the worst part:

By deleting all of 13.01.E and 13.01.H, the Department of Planning is proposing to eliminate many of the principal tools the public has used to force the ZA to hold public hearings when there has been non-compliance at drill sites.

At a [Planning Department web-based presentation for Neighborhood Council Board Members](#), Planning told people that "Planning will have authority and process to call back operators when they are not acting in good faith or are posing a nuisance or danger to the surrounding community."

But the Planning Department is proposing to delete most of the safety and environmental protections from the code. Many violations would cease to be violations because there would no longer be City Code defining them as violations. And then Planning is proposing to delete the main Code sections authorizing ZA reviews for non-compliance and the authority for the ZA to order corrective measures.

Planning is not proposing to add any new mechanisms for inspection, monitoring, enforcement, or authority for the Zoning Administrator to do anything at all

Everyone who has watched the Rancho Park and West Pico Drill Site cases has seen a Planning Department (represented by the Zoning Administrator) that has not wanted to fulfill its responsibilities under the City Code. So the Planning Department is proposing to delete those responsibilities from the City Code and replace them with empty promises.

We think that the strongest argument against the ill-advised proposed ordinance is to show through the West Pico Drill Site case that oil wells operated by a serially non-compliant company can be plugged now, not maybe in 20 years or maybe never, but now.

How do we know that can be done? Because it has been done before, at the 4th Avenue Drill Site in CD10 (with the allegiance of then Council Member Herb Wesson) and at the Jefferson Drill Site in CD 8 (with the allegiance of Council member Marqueece Harris-Dawson).

So there is a choice:

There are remedies that have been proven to work when supported by the local City Council Member. There are remedies that actually get wells plugged.

And there is a proposed draft promise by the Planning Department that in 20 years, two decades after the expiring terms of current City Council Members are long forgotten, somehow things would be better and the wells will be plugged if almost all the rules are deleted.

Yours,

Prof. Michael Salman

Oils Email <planning.oildrilling@lacity.org>
To: Michael Salman <salman@history.ucla.edu>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:57 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

County Oil and Gas Operations CPC-2022-4864-CA

2 messages

John Holland <jholl54353@msn.com>
To: planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 3:49 PM

Dear Ms. Torres;

I am an owner of oil leases in Los Angeles county which have been in my family for generations. I am retired and count on the royalty payment from these leases as income. I understand that the city of Los Angeles is taking rapid steps to eliminate oil and gas operations in the county. I am contacting you in order to urge you to reconsider this drastic action. People like myself and those employed in the industry would be financially impacted by your decision.

Respectfully;

John P. Holland
23000 Dart Dr.
Tehachapi, Ca. 93561
(805) 338-0986

County Oil and Gas Operations CPC-2022-4864-CA

Oils Email <planning.oildrilling@lacity.org>
To: John Holland <jholl54353@msn.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:06 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA - City of LA to Ban Oil and Gas Drilling2 messages

Pier Tegel <piertegel@gmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 6:42 PM

From: Gary and Pier Tegel
To: Jennifer Torres – Department of City Planning
Re: CPC-2022-4864-CA - City of LA to Ban Oil and Gas Drilling

More than 50,000 people power California's oil and gas production under the strictest environmental standards in the world, generating \$1.5 billion in state and local tax revenues to fund schools, social services, and public safety in the communities where they live and work. Oil and Gas employees and contractors – single moms, immigrants, second chancers, veterans, union members – set an example to other states and countries by producing the safe, affordable, and reliable energy we need in a way that safeguards public health, safety, and the environment.

As our gas prices continue to rise, we are spending in California well over 25 billion dollars a year for imported oil. We make over 6000 everyday products made from petroleum products, we have here in California the most stringent regulations in the world regulating the gas and oil industry.

And you want to shut it down? Our country needs OIL period. We have a viable resource which has blessed our communities for many years. Our nation as a whole is dipping into Emergency Oil Reserves as I type which are supposed to be used in Emergencies only. This is not good. You will be taking not only jobs from within the petroleum industry, but it will impact all the industry within LA county. In California we serve 13 million gallons of gasoline a day to the aviation community. Are you going to shut down LAX as well? People who commute use 42 million gallons of gas a day and 10 million gallons of diesel. Are the 35 million registered vehicles going to have the fuel needed to get to their jobs?

The City of LA has many other industries which are also in the area you have called out as hazardous. Are you going to shut down the Train system, close the Port of Long Beach, shut the many industrial plants that are throughout the LA area?

In response to your decision to close all new oil and gas drilling and cap all wells in the next 20 years is in my opinion "not in the best interest of the community". I would ask you reconsider this Ordinance and allow Oil Companies to continue to operate-under the stringent regulations that California imposes. It has and will be a life blood of not only our State but of our County for generations to come.

Thank you,

R/ Gary and Pier Tegel

Oils Email <planning.oildrilling@lacity.org>
To: Pier Tegel <piertegel@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:42 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

JOSEPH MAYER <mayerjg@sbcglobal.net>

Mon, Aug 22, 2022 at 2:33 PM

Reply-To: JOSEPH MAYER <mayerjg@sbcglobal.net>

To: "MAYOR.HELPDESK@LACITY.ORG" <MAYOR.HELPDESK@lacity.org>,
"COUNCILMEMBER.BUSCAINO@LACITY.ORG" <COUNCILMEMBER.BUSCAINO@lacity.org>,
"PLANNING.OILDRILLING@LACITY.ORG" <PLANNING.OILDRILLING@lacity.org>

Dear Mayor Eric Garcetti, Councilmember Joe Buscaino, Department of City Planning Jennifer Torres

My name is Joe Mayer. I am 83 years old and I depend on royalty income I receive monthly for a sustainable quality of life.

This income along with Social Security allows me to cover medical premiums and medications. I implore you not to eliminate oil and gas operations in the county of Los Angeles.

Sincerely,
Joe Mayer

Jennifer Torres <jennifer.a.torres@lacity.org>

Mon, Aug 22, 2022 at 2:44 PM

To: Planning Oil Drilling <planning.oildrilling@lacity.org>

Cc: JOSEPH MAYER <mayerjg@sbcglobal.net>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Robert Harding <harding1116@gmail.com>

Mon, Aug 22, 2022 at 3:55 PM

To: Planning.oildrilling@lacity.org, Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org

This ordinance is a bad idea when costs are going up for everything.

Our family needs the income these wells provide.

I would think municipalities would be glad for the tax revenue, but that aside - please don't take the money out of our pockets.

Sincerely,

R B Harding

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:26 AM

To: Robert Harding <harding1116@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Linda Chuises <linda.chuises@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 11:14 AM

Jennifer Torres:

We object & strongly urge you to NOT pass Ordinance CPC-2022-4864-CA!!

This State & our whole country has a shortage & is in need of these domestic resources!!!

Sincerely,

Linda Chuises

Oils Email <planning.oildrilling@lacity.org>
To: Linda Chuises <linda.chuises@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:07 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'SKH' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 24, 2022 at 9:59 AM

Reply-To: SKH <hindssk@yahoo.com>

To: "Planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Good morning,

I'm writing you to express my opposition to Case Number CPC-2022-4864-CA. In an era of dwindling energy resources and increased energy costs it's counterproductive to remove existing wells from production. The shutdown of these wells will not reduce consumption but only increase imports from other areas, both domestically and from overseas.

Sincerely,
Samuel Hinds
Mission Viejo, CA

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:11 PM

To: SKH <hindssk@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Judy Dollinger <jjdollinger@att.net>

Wed, Aug 24, 2022 at 10:52 AM

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

Dear Ms Torres,

Please do not support the cessation of all existing oil and gas operations in LA county. As a senior, the loss of royalty income will have a negative impact on my retirement income. I am sure this is true for many seniors during this period of high inflation.

Thank you for your consideration,

Stephen H. Dollinger

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:12 PM

To: Judy Dollinger <jjdollinger@att.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Sherry Hetz <sdhertz@fnfc1923.com>

Wed, Aug 24, 2022 at 6:19 PM

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

RE: Case Number CPC-2022-4864-CA

Dear Ms. Torres:

Next year we will be honoring our 100 years of continuous operation in California. Our company has been a significant contributor to the success of California as we drilled for oil, farmed agricultural products, generated opportunities for hundreds of employees and other small businesses, and provided options for low-cost housing.

Please consider the following generational impact and damage to all of California if oil and gas extraction were to be halted.

- The cessation of oil and gas extraction will be the cessation of oil and gas revenues. What calculations have been made regarding those losses? What will the new source of revenue be?
- The highly skilled labor with the highly paid wages will no longer generate taxes. This skill set will not likely transition to a new industry as any new industry will take a generation to reinvest, retool, and re-train.
- The local businesses utilized by the oil industry will be gone. Be it restaurants, convenience stores, work wear, industrial equipment, hardware and tool supplies, and mechanical repair. The lost revenues and taxes from these supporting industries will result in even more job and tax revenue losses for Los Angeles.
- The likely timeline to unwind, phase out, and transition from current oil operations is significant. There is no current industry with a proven track record that can come close to the success and benefits provided from a century of experience and technological growth.

Maybe now would be the time to allow upgrades and updates to the California oil industry. These upgrades would increase the efficiency of oil and gas recovery with the added benefit of better safety and ecological results for all residents of this great state.

Regards,

First National Finance Corporation

Sherry D Hetz

Vice President & Assistant Secretary

909-337-5600

Oils Email <planning.oildrilling@lacity.org>
To: Sherry Hetz <sdhetz@fnfc1923.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:20 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

John M Gibbs <jgibbs16@tampabay.rr.com>

Thu, Aug 25, 2022 at 8:48 AM

To: Mayor.helpdesk@lacity.org

Cc: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

To: Honorable Mayor Eric Garcetti, Jennifer Torres and Joe Buscaino

I am emailing you in response to a letter received by mail from Warren Resources regarding the Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA.

I am an 86 year old retired R.N. caring for my home and 90 year old spouse in Florida. I can relate to the United Neighborhood's concerns. I was a nurse at a Nuclear Power Plant for seven years. My husband grew up in Fernandina Beach, Florida where my father worked seven days per week as a railroad engineer. My father worked in the Florida sun carrying pulp and paper between two mills breathing at times horrendous sulfur fumes as did my husband. My dad smoked a pipe as well. Dad took care of my mother and went to sleep one night at age 92. I grew up in Jacksonville, Florida on a busy one way street that led from the city to the suburbs breathing noxious fumes as we played outside. Currently we live on a very busy residential street that has become a highway due to construction on U.S. 19. More fumes! We still maintain our health.

Warren Resources per Goggle has been in operation in Los Angeles since 1990. They feel they are good stewards of the land and conduct safe and responsible production of our natural resources. With our recent oil crisis causing gas prices to skyrocket, our dependence on foreign oil and President Biden having to tap into our emergency oil reserves, I cannot understand the cessation of eliminating oil and gas operations in the County of Los Angeles which has a large supply of badly needed oil.

My husband and I, as well as other retirees depend on Warren Resources to supplement our income. We cannot let fear play a role in this very important matter.

Thank you for allowing me to express my opinion.

Sincerely,

Diane Gibbs

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:22 PM

To: John M Gibbs <jgibbs16@tampabay.rr.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Gary Jacobson <Gary.Jacobson@gcccd.edu>
To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 6:59 PM

RE: CPC-2022-4864-CA

To Jennifer Torres, Department of City Planning

I have just been informed that the City of Los Angeles is planning to eliminate oil and gas operations in the County of Los Angeles. While I understand and support the City's motives behind the initiative, I am concerned that the initiative may be poorly timed, counterproductive, and unnecessary.

The move to renewable energy sources may be inevitable but banning oil and gas production in the county will do little to hasten that transition. Gas burning cars are clearly becoming less popular, but it will likely take a couple decades or more before they are completely replaced. Meanwhile they will still depend on gasoline. So, eliminating local oil production will require an increase in imported oil shipments until the transition to renewables is complete. I don't know if anyone in the City has done the analysis, but there are severe consequences of increasing our dependence on foreign oil that may far outweigh the local benefits. If you have made that analysis, I would be very interested to see the results. I understand that there are clear health risks to those who live near oil wells, but there are also health risks to increasing our reliance on foreign oil (e.g. Putin's war on Ukraine was largely financed with the proceeds of Russian oil exports). I hope the City is seeing the big picture here.

"First in time, first in right" should also be considered. Most of the wells in the Los Angeles basin date back to the 1930's and 1940's when the population of LA County was a quarter that of today's. Thus, the City permitted far more residences to be built near oil wells rather than oil wells to be drilled near residences. As such, it seems unfair to penalize oil producers for the City's failures in managing residential development. If the City feels strongly about doing the right thing, then they might want to consider compensating all those affected in the oil industry for the loss of their livelihood.

Finally, most of the oil fields in the LA Basin are reaching the end of their productive life anyway. So, the problems associated with producing oil from the most highly urbanized fields in the world will likely go away on their own in a decade or two without any government intervention. The coeval transition to renewable forms of energy will only hasten that process by making oil production less profitable.

Thank you for your consideration,

Gary Jacobson

Geology and Oceanography instructor,

Grossmont College

gary.jacobson@gcccd.edu

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:28 PM

To: Gary Jacobson <Gary.Jacobson@gcccd.edu>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'electlips@aol.com' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 10:25 AM

Reply-To: "electlips@aol.com" <electlips@aol.com>

To: Planning.Oildrilling@lacity.org

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing “amortization” of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Debi Blood

[29 Marina Drive](#)[Newnan, GA 30263](#)

Sent from Debi Blood's iPad -
Electlips@aol.com

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:29 PM

To: "electlips@aol.com" <electlips@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Judith Johnson <oldchick39@comcast.net>

Fri, Aug 26, 2022 at 12:44 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

I own property interests in the form of mineral rights located within the City of Los Angeles. I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of my vested property interest.

I understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

I urge you to reject this ordinance. You are confiscating our property without just compensation.

Judith Johnson

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:30 PM

To: Judith Johnson <oldchick39@comcast.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

budandkarenmolle@gmail.com <budandkarenmolle@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 4:01 PM

Jennifer Torres, Department of City Planning

My name is Louis R. Molle, retired LA city Fire. We have been receiving oil royalties since 1974. I believe it would be unjust to deny this assistance to my pension. Please vote no to CPC-2022-4864-CA. Thank you

Oils Email <planning.oildrilling@lacity.org>
To: budandkarenmolle@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:58 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'Kenneth Church' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 4:13 PM

Reply-To: Kenneth Church <churchkhc@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

I am opposed to the proposed ordinance designed to ban oil and gas extraction and all oil and gas operations. This type of foolishness will only increase poverty and inflation for the common people.

Kenneth H. Church

801-349-0339

Confidentiality Notice:

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original.

----- Forwarded Message -----

From: MAILER-DAEMON@yahoo.com <mailer-daemon@yahoo.com>**To:** "churchkhc@yahoo.com" <churchkhc@yahoo.com>**Sent:** Monday, August 22, 2022 at 05:08:21 PM MDT**Subject:** Failure Notice

Sorry, we were unable to deliver your message to the following address.

<Planing.oildrilling@lacity.org>:

550: 5.1.1 The email account that you tried to reach does not exist. Please try

5.1.1 double-checking the recipient's email address for typos or

5.1.1 unnecessary spaces. Learn more at

5.1.1 <https://support.google.com/mail/?p=NoSuchUser> bn45-20020a05620a2aed00b006bbc5fa8d11si4298588qkb.483 - smtp

----- Forwarded message -----

I am opposed to the proposed ordinance designed to ban oil and gas extraction and all oil and gas operations. This type of foolishness will only increase poverty and inflation for the common people.

*Kenneth H. Church***Confidentiality Notice:**

This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original.

Oils Email <planning.oildrilling@lacity.org>

To: Kenneth Church <churchkhc@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:58 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Ando Electric <andoelectric@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 2:19 PM

Dear Jennifer,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Diana Ono
Ando Electric Motors, Inc
andoelectric@gmail.com
562-437-0445 ph

Oils Email <planning.oildrilling@lacity.org>
To: Ando Electric <andoelectric@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:31 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas

Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Linda Simmons <lindasimmons1@gmail.com>

Tue, Aug 23, 2022 at 9:37 AM

To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

To: Jennifer Torres, Councilman Joe Buscaino, and May Eric Garcetti

My husband and I just received a letter from Warren Resources that our Royalty Income is about to end. They state that the City of Los Angeles is taking rapid steps to eliminate oil and gas operations in the County of Los Angeles. We are begging you to not phase out oil drilling in the city.

My husband and I are very energy conservative. We both drive Teslas and we have solar on the roof of our home and our business. Our business, however, has five vans that travel a great distance every day. We have two diesels and three gasoline vans. We have called and inquired about getting electric vans, but they do not have the range we need. The hybrid vans are not large enough.

If the city of Los Angeles stops oil production, the price of our fuel will go up forcing us to raise our prices again and this contributes to the horrible inflation we are currently enduring.

Please reconsider discontinuing oil production in Los Angeles. This will reduce our income while making my expenses much higher.

I am not alone in this problem. My business is a laundromat. I have 30 employees including 7 drivers. For quite awhile, I was having trouble hiring, but lately, I am getting more applications than ever before for a minimum wage job. I am getting overly qualified people --people with degrees, people who have been in the workforce for years, people who already have a job and want a second job. I ask them why they are looking at a laundromat for a minimum wage job when they have a job as a district sales manager. They all say the same thing. They can't afford gas. They need a second job to survive. I am devastated at what is happening to our economy and to the people in my neighborhood who are just trying to survive. Please consider those in your district who cannot afford higher fuel prices.

Sincerely,

Linda Simmons
Super Suds Laundromat
(562)252-2474 cell phone

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:02 PM

To: Linda Simmons <lindasimmons1@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'char stathos' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 10:28 AM

Reply-To: char stathos <charstathos@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Dear Jennifer Torres,

Please do not stop the oil drilling in LA. We are on a fixed income, and we are dependent on every extra income that comes in.

Thank you for your prayerful consideration regarding the impact this would have on families.

Sincerely,

Char Stathos
209-406-0116

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:05 PM

To: char stathos <charstathos@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

9/12/22, 4:44 PM

City of Los Angeles Mail - CPC-2022-4864-CA

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Ando Electric <andoelectric@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 2:20 PM

Dear Jennifer,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

*Thank you.**Sincerely,*

Walt Ando
Ando Electric Motors, Inc
andoelectric@gmail.com
562-437-0445 ph

Oils Email <planning.oildrilling@lacity.org>
To: Ando Electric <andoelectric@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:31 PM

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

bobchilds via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 9:53 AM

Reply-To: bobchilds@aol.com

To: planning.oildrilling@lacity.org

To Whom it may concern:

As a third generation LA County born citizen, I am writing in reference to the Case Number in the subject line, above.

At, or slightly before my time, our family owned then vacant land near the Pacific. At the time, we were encouraged to allow drilling on our property to further support the growth and success of California. Also, perhaps more important at the time, was the support for energy independence and the need of the gas and oil to support our country as a whole during the war (WWII). So, we did so willingly and enthusiastically.

Over the years, the royalties from the drilling came to be an important part of our income in retirement. We are not of great wealth. Therefore, while we still strongly support the notion of oil independence, we also have a financial interest, however small, in the continued allowing oil and gas drilling in the area.

So, we oppose the cessation proposal and hope our voices will be heard when a vote is held on this potentially hurtful plan.

Please consider joining in our opposition.

Thank you in advance.

Sincerely,

Robert W. Childs

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:04 PM

To: bobchilds@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

lynette.patterson61 <lynette.patterson61@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 4:25 PM

Dear Ms. Torres,

I own property interests in the form of mineral rights located within the city of Los Angeles and I am voicing my opposition of the proposed Oil & Gas Drilling Ordinance referenced above.

I do understand the goals and objectives of the Council regarding emissions and climate change, but oil and gas development in the city of Los Angeles is important to the local economy. This industry provides essential jobs, not to mention the millions of dollars in state and tax revenue. The oil and gas produced in Los Angeles follows strict safety and labor standards which are not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our families have relied on for generations, therefore I respectfully request that our interests be carefully considered and that you will reject this ordinance and work with us to find a more equitable approach.

Thank you.

Lynette G. Patterson

Sent from my T-Mobile 4G LTE Device

Oils Email <planning.oildrilling@lacity.org>
To: "lynette.patterson61" <lynette.patterson61@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:14 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'David Herrington' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 6:01 PM

Reply-To: David Herrington <ds_herrington@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Dear Ms. Torres

I understand bill CPC-2022-4864- CA outlaws drilling in Los Angeles. This includes present wells that are about played out and receiving steam injection. People will lose their jobs during a recession and the oil will have to be replaced from foreign sources. This seems very short sighted and simply a virtue signal. Please ask you to reconsider the wisdom of this bill.

Sincerely,

David Herrington

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:49 AM

To: David Herrington <ds_herrington@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Andie Katres Stephen Hildreth <andiehildy@hotmail.com>
To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Sun, Aug 28, 2022 at 11:56 AM

Jennifer Torres;

Dear Jennifer,

My name is Stephen L. Hildreth and I am writing to you concerning the elimination of the oil and gas operations in the city of Los Angeles. I have been receiving royalty checks from Warren since 2009 passed down from my Grandparents, Sam and Esther Leonetti and my Mother, Helen Hildreth. As you can imagine, I would not like to see this come to an end. Warren Resources has been an excellent company to deal with through the years. They have been lawful, ethical, and responsible. I would like to see the operations continue. Also I would think that if this drilling disappears alot of jobs would be lost. Thank you for taking the time to read this and your consideration for my deep concerns.

Respectfully,
Stephen L. Hildreth
[160 Tamara Lane](#)
[Bayfield, Co. 81122](#)
425-444-9392

Oils Email <planning.oildrilling@lacity.org>
To: Andie Katres Stephen Hildreth <andiehildy@hotmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:52 AM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'Mona Mirdo' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 8:12 AM

Reply-To: Mona Mirdo <mirdomona@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

I respectfully request that ordinance CPC-2022-4864-CA be tabled until our country produces enough reliable energy to sustain current and future needs

Sent from [Mail](#) for Windows

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:10 PM

To: Mona Mirdo <mirdomona@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Ronald Roberts <rockyroberts12@outlook.com>

Mon, Aug 29, 2022 at 1:08 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
Planning.oildrilling@lacity.org
(213) 978-3094

- **Mayor Eric Garcetti**
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012
Mayor.helpdesk@lacity.org
(213) 978-0600

- **Office of Councilman Joe Buscaino**
City of Los Angeles, District 15
638 S Beacon Street
San Pedro, CA 90731
councilmember.buscaino@lacity.org
(310) 732-4515

Dear Sirs,

I hold mineral rights within the City of Los Angeles, and I've recently learned of the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest. I am writing to express my opposition to this ban.

The City of Los Angeles has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less. I care about this, and surely you do too.

Also, oil and gas development in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally. I believe this is also something you should care about.

Keeping these blue-collar jobs and supporting the cleaner air this production ensures instead of foreign production would be a commendable action. Please do not support this ban!

Thank you.

Sincerely,
Ronald Owen Roberts

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Ronald Roberts <rockyroberts12@outlook.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 1:13 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'Vicki Sanchez' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:43 PM

Reply-To: Vicki Sanchez <sanchezv@aol.com>

To: mayorhelpdesk@lacity.org, planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

I own oil rights in the city of Los Angeles and what you are doing is trying to take away my oil right . This is not fair to everyone who owns them and relies on this money to help them live. I feel that is unfair and shouldn't be done. what will happen too the rights that we have now? will you just closed us down and enjoy everyone oil right and you will benefit from it. you are the only county trying to do this to people and it is not fair.

Vicki Sanchez

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:55 PM

To: Vicki Sanchez <sanchezv@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA ban on new oil and gas extraction in Los Angeles

1 message

cmbergman1 via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:45 AM

Reply-To: cmbergman1@verizon.net

To: cmbergman1@verizon.net

To the City of Los Angeles leaders:

We are definitely AGAINST the proposed ban on new gas and oil extraction being considered by the City of Los Angeles, CPC-2022-4864-CA. To require the cessation of these operations would be a detriment to those in our area who rely on gasoline for transportation. Our public transit system is not adequate for the general population - too slow and infrequent! And it is not reasonable to expect (as our governor proposes) that all cars be electric in the coming decades! For short trips, they are fine. However, anyone who wishes to travel anywhere outside of Southern California, will find it difficult to recharge en route.

Please reconsider this ban, and vote NO!

Thank you,
William and Constance Bergman
Cerritos, CA



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA CF17-0447

2 messages

david via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:35 AM

Reply-To: david@sbaic.net

To: planning.oildrilling@lacity.org

We are in opposition to the changes of the ordinance. Public policy that is restricting the use and development of fossil fuels and natural gas are dooming our expensive/non-competitive region and state to unreliable and expensive energy costs that will cost jobs and damage the economy.

With Regards,

David

David Goodreau

President, Small Business Aerospace Industrial Coalition

[1603 Don Carlos Ave.](#)

[Glendale, CA 91208](#)

C: 818-298-0522

www.sbaic.net

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:12 AM

To: david@sbaic.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commision on September 22, 2022. The final City Planning

Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA due before 5 today??

2 messages

Denise Williams <conflictresolutionworks@gmail.com>
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 1:11 PM

Re: CPC-2022-4864-CA

Denise Williams
[2735 S. Averill Ave.](#)
[San Pedro, CA 90731](#)

September 2, 2022

Attn. Jennifer Torres
Department of City Planning
[200 North Spring Street, Room 701](#)
[Los Angeles, CA, 90012](#)

Dear Los Angeles City Planning Commission,

Every year of my life thousands of people in Los Angeles have been seriously injured or killed by the consequences of oil and gas drilling in our city. In addition - as if mass poisoning was not enough - our precious water has been wasted, and our vast skies filled with toxins directly because of these extractions in our city. In the 60s and 70s I dreamed of more effective filters and drilling practices, and trusted people like you to ensure this would happen. I didn't understand that corruption would continue to dominate these efforts and outcomes over half a century later.

Our region's unusual fires, starting when I was a little girl, were the result of climate change, and now we understand climate change is destroying the trees and wildlife we hold sacred for our children's children to enjoy, as well as bringing about deadly

changes to our weather, diseases, and annoying pests that impact everyone in our county in deadly ways - and this is only 2022. Please, for you, your own families and friends, if not for mine, and for this precious amazing little planet, find the deep courage, integrity, and real data and work everyday to quickly support and implement the PROPOSAL TO BAN OIL AND GAS DRILLING IN LOS ANGELES (CPC-2022-4864-CA) until it is well completed for all of our lives, and those of all of the children.

Please also communicate my requests to every member of the Los Angeles City Council, and sign me up for updates if I'm not already on them.

Thank you,

Denise Elaine Williams

Oils Email <planning.oildrilling@lacity.org>
To: Denise Williams <conflictresolutionworks@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:05 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Your contact information has been added to the Interested parties list and you'll be notified of the progress of the Oil and Gas Drilling Ordinance.

Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA Oil Drilling Ordinance

2 messages

bswagoner <bswagon@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 4:06 PM

- **Dear Jennifer Torres, Department of City Planning**

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

***Sincerely,
Bradley Wagoner
FLORA D. WAGONER ESTATE***

Oils Email <planning.oildrilling@lacity.org>
To: bswagoner <bswagon@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 11:50 AM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

9/12/22, 8:56 PM

City of Los Angeles Mail - CPC-2022-4864-CA Oil Drilling Ordinance

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA Proposed Oil and Gas Drilling Ordinance

2 messages

Margaret Hansen <marjehansen77@gmail.com>

Sat, Aug 27, 2022 at 7:44 AM

To: Planning.oildrilling@lacity.org, mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org

Case Number: CPC-2022-4864-CA

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Margaret Hansen

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:53 PM

To: Margaret Hansen <marjehansen77@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA Rosa Diaz

2 messages

vicrosa720 via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:42 AM

Reply-To: vicrosa720@yahoo.com

To: Planning.oildrilling@lacity.org

I am Rosa Diaz very concerned about my Royalty rights being stopped , I am 94 and a widow living on a fixed income.
Please do something .

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:21 PM

To: vicrosa720@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'char stathos' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 10:28 AM

Reply-To: char stathos <charstathos@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Dear Jennifer Torres,

Please do not stop the oil drilling in LA. We are on a fixed income, and we are dependent on every extra income that comes in.

Thank you for your prayerful consideration regarding the impact this would have on families.

Sincerely,

Char Stathos
209-406-0116

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:05 PM

To: char stathos <charstathos@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA; ENV-2022-4865-EAF comments on draft oil ordinance

2 messages

Michael Salman <salman@history.ucla.edu>

Tue, Aug 30, 2022 at 4:56 PM

To: planning.oildrilling@lacity.org

Cc: lilian.rubio@lacity.org

CPC-2022-4864-CA

ENV-2022-4865-EAF

sending comments again with the case #s

To the LA Department of City Planning Oil Regulation Unit

Below is an analysis of some (but not all) of the major problems in the proposed draft ordinance. It has been shared with hundreds of community members who have been involved in multiple oil drill site cases.

The analysis refers to SB 1137, which is being voted on by the State Assembly tonight and will be brought to the floor of the State Senate tomorrow. Passage is uncertain, especially coming down to the end of the legislative session tomorrow at midnight. If passed, it would prohibit drilling, redrilling, and reworking of oil wells within 3200 feet of sensitive land uses. "Reworking" is a term for certain kinds of projects that must be approved by CalGEM; it is defined in the State's Public Resources Code, so it has clear and specific meaning. SB 1137 would use existing inspection and enforcement mechanisms at CalGEM, and build upon them. It would be effective. In those ways it is strikingly different from Planning's proposed ordinance, as the analysis below details.

Yours,

Michael Salman
Professor Emeritus
History, UCLA

This is an update about the draft City ordinance that was proposed by the Los Angeles Department of City Planning on August 9, 2022.

We will first will give you the links to the Planning Department's proposal and describe the long timeline for action and input. Then in the following sections we will show you the problems with the proposed draft ordinance.

Our presentation of the flaws and dangers of the proposed City ordinance is long. But it is about whether communities want 20 years of increased chaos and hazards at oil drill sites. It is much quicker to do good things now than to live through a 20 year nightmare.

1) The Planning Department has created a couple of web pages with information about its proposed draft ordinances.

A link featured on the [Planning Department's home page](#), takes you to an [August 9, 2022 press release announcing the proposal](#). The press release has a link to the proposed draft ordinance and a link to a "fact sheet."

The Planning Department also set up a [separate web page for the proposal](#) that includes links to the proposed draft ordinance and information about public meetings that will be held by the

Planning Department.

Later this fall, Planning intends to submit the proposal to the City Planning Commission, which would hold a formal hearing to decide on whether to recommend the proposal to City Council.

City Council would hold its own hearings on the proposal.

The Planning Department is holding a public meeting tonight, at 6PM. The [notice of the event is here](#). Planning is calling it a "public hearing," but it seems to be only an information and comment meeting rather than a formal public hearing run by a decision maker.

It is important to remember that only City Council can enact ordinances. City Council meetings on this proposal, if they happen, will be far in the future.

- There are additional major steps of study and review that would be necessary before City Council could act on the proposal.
 - The City Council has been voting to request reports and studies and drafts related to possibly phasing out oil wells in the City since 2017. Here is the Council File that has most of that record: [CF 17-0447](#).
 - On November 17, 2020, Deputy City Attorney Jennifer Tobkin told a City Council committee that the City Attorney would defend a prospective phase out of oil wells by amortization based on a "a strong administrative record which includes expert amortization studies and proper environmental review." She told the committee that "environmental review under CEQA would . . . have to be performed." The audio recording of the committee is here, relevant part starts at 1:59:00 (https://lacity.granicus.com/MediaPlayer.php?view_id=103&clip_id=20391)
 - No environmental review has been performed.
 - Last year the City appropriated \$3.5 million to hire outside firms to conduct amortization studies on several drill sites, not all of them. The studies were expected to take up to three years to complete. It is not clear how many have been started.

2) At first glance, the proposed draft ordinance from the Department of City Planning looks like SB 1137, but that is more illusion than reality.

The proposed draft ordinance says that it would:

- Prohibit drilling of new oil wells throughout the City.
- Prohibit the redrilling of existing oil wells throughout the City.
- Prohibit the "maintenance" of existing oil wells throughout the City.
- And declare all existing oil wells throughout the City a "nonconforming use" that will be amortized out of existence and "completely removed" within 20 years.

We will address each of those points to show that the proposed ordinance promises things it cannot deliver. Then we will show you that it proposes to actively destroy the protections and tools in the City Code that have been used successfully to rein in oil companies and to close drill sites & get all of their wells plugged.

Before we begin, remember that the Department of City Planning is the home of the Zoning Administrator. The sections of the City Code that the Planning Department proposes should be changed are in the Zoning Code. The Zoning Administrator's failure and refusal to implement and enforce the Zoning Code is at the root of the problems at the West Pico Drill Site, alongside the Zoning Administrator's failure and refusal to implement CEQA's requirements of environmental review.

Unlike SB 1137, the proposed draft City ordinance comes with no preexisting inspection and enforcement system, and it does not propose creating one. In fact, the Planning Department says it is not necessary. That is a fatal flaw. Here is why.

- Saying that something is prohibited while providing no means to enforce the prohibition is the definition of ineffective.

- The "fact sheet" issued by the Planning Department says a frequently asked question is, "Who will ensure that operators stop drilling and properly remove their oil wells after the amortization phase?" The "fact sheet" offers this answer: someone else, mainly agencies at the State level that do not and cannot enforce local City Code. There is no plan for inspection, monitoring, or enforcement of City Code.
- The City dropped the ball on developing a general compliance and enforcement program after a September 2018 City Council vote to establish such a program by ordinance. This was exposed on the [front page of the LA Times on April 20, 2021](#). There is still no inspection ordinance and no inspection program.
- ***But here is the bigger rub. Ending the legal drilling and redrilling of oil wells in the City is practically a non-issue:***
 - Existing City Code requires an oil company to apply to the ZA for approval to drill, redrill, or convert an oil well. The ZA can deny the application.
 - The last time the ZA issued an approval for an application to drill a new oil well was in September 2007, for the Murphy Drill Site in CD 10.
 - The last time the ZA issued an approval to redrill an existing oil well was in August 2014, for the San Vicente Drill Site in CD 5 (where Council Member Koretz signaled his assent to the project, as noted in the ZA's determination).
 - ***It has been 8 years since an oil company has obtained a ZA approval for an oil well redrilling project and 15 years since a ZA approval for a new well.***
 - Community opposition and opposition from the local City Council Member would almost certainly lead to a denial of a new application. Here is an example:
 - From 2014 to 2016, the community surrounding the Murphy Drill Site in CD10, with support from then CD10 Council Member Herb Wesson, fought back when the ZA was going to allow installation of a gas burning flare. An initial approval was set aside. A new review was held. And in June 2016 the ZA denied the application to install the gas burning flare.
- ***As we know from the West Pico Drill Site case, the real problem is that oil companies have been drilling new wells, redrilling existing wells, and converting wells without submitting the required applications to the ZA for approval, and the City does not stop them because the City does no general compliance inspections, no monitoring, and no enforcement (unless the public forces the City to do it).***
 - The problem is not unique to West Pico.
 - On June 3, 2022, the LA Times published an article about the City's largest drill site, in the Wilmington section of the City, where multiple oil well projects have been executed without the required applications to and approvals from the City's ZA. The Times article reported on US Representative Nanette Barragan hosting a press conference to publicize the problem. The Planning Department said they would open a review and hold a public hearing, but they have not done so.
 - We told the ZA's office about these problems at the drill site in Wilmington in fall 2020, a year and a half before the LA Times article, but they the ZA's office still has not acted.
 - The necessary step to stop illegal oil drilling is to do inspection and enforcement.

3) The proposed ordinance's prohibitions against drilling and re-drilling will do nothing.

What about the prohibition against "maintenance"?

- The proposed ordinance does not define the words "maintain" or "maintenance," and they are nowhere defined in existing City Code.
- The Planning Department's "fact sheet" says a frequently asked question is, "Can operators maintain their wells during the amortization phase?" And then it provides this answer:
 - "Well servicing activities such as replacement of tanks, appurtenant structures, and equipment would not be affected by this ordinance. Maintenance activities such as, but not limited to, acid treatment, reworking, and sidetracking would not be permitted once this ordinance becomes effective."
- But none of that is defined in the proposed ordinance nor anywhere in existing City Code.
 - "Maintenance" has no specific meaning in industry practice nor in City law. It means everything from sweeping the floor to replacing seals & gaskets to prevent leaks, to using acids to clean oil well casing perforations. It means everything and thus it means nothing.

- Even if the Planning Department created inspections and enforcement mechanisms, it could not enforce such a vague and undefined prohibition.
- The authors of the "fact sheet" do not seem to realize that "sidetracking" is, in fact, redrilling an existing well in a new lateral direction.
- This is one of many indications that the proposed draft ordinance has been rushed without study, without knowledgeable input, and without due care.

4) The proposed ordinance's promise that all oil wells will be "entirely removed" by the end of a 20 year amortization time period also comes with no mechanism for enforcement and no plan for making sure that the wells are plugged by the oil companies.

But don't let that fool you. The proposal is actually emptier and more dangerous than that.

- We trust you are by now familiar enough with the lack of inspections, monitoring, and enforcement being the taproot of almost all other problems.
- So let's look at the 20 year promise:
 - Governor Newsom has already set a target date of 2045 for the phase out of the oil extraction industry in California.
 - More importantly, the State just approved regulations that forbid the sale of new gasoline powered cars starting in 2035, and require the further acceleration of electric and fuel cell electric vehicle sales starting in 2026.
 - The Federal government just passed President Biden's "Inflation Reduction Act," which includes large incentives for automakers to retool to make electric vehicles and expand tax credits for buying new and used electric vehicles.
 - As the vehicle fleet in California accelerates in its transition away from use of gasoline and diesel fuels, demand for oil in California will drop steeply and oil wells in California will trend toward being unprofitable.
- **In roughly 20 years, production at oil wells in the City of Los Angeles is highly likely to end even if the City does nothing. But the proposed ordinance from the City Planning Department is much worse than just an empty promise.**
 - The smaller issue is the lack of attention to the difficult problem of how to get oil wells plugged. Smaller is a relative term. It costs an average of \$330,000 to plug a recently used oil well in the City. There are about 1,100 active and idle oil wells in the City with extant owners that should pay to plug the wells. There are another almost 1,000 wells that need updated plugging, most of which have no extant owners and many of which could be very expensive to plug.
 - The City should have already learned from its handling of the infamous AllenCo operated Drill Site in University Park, where all of the wells have been degrading since the end of 2013, with no prospect of getting the wells plugged anytime soon.
 - Environmentalists and regulators know that getting oil and gas well owners and mine owners to clean up after they close business is extremely difficult because the responsibility to plug wells, fill mines, and do clean-up can be discharged (i.e., wiped out) in bankruptcy.
 - The City has just had an object lesson about this danger in the case of the Exide Battery recycling plant in the Vernon/East Los Angeles area that contaminated several square miles with lead. The clean up cost is approaching \$1 Billion. Exide's liability was erased in bankruptcy. Exide is an example of a business that can shut down and then do no clean up.
 - **The bigger and more dangerous problem is that the proposed draft ordinance would delete almost all of the safety and environmental protections applied to oil wells in the Zoning Code, and it would delete almost all of the tools that the public and concerned Council Members have used to force effective action.**

5) We have saved the worst for last.

While the proposed ordinance would insert a few ineffectual words into the City's Zoning Code promising to prohibit new wells, redrilling, and "maintenance," and a few words promising that all oil wells will disappear in 20 years - all without any inspection and enforcement mechanisms - the proposed ordinance would do something far worse.

The proposed ordinance would delete almost all of the existing Zoning Code regulating the oil industry.

It would throw into the trash bin almost all of the City's laws offering safety and environmental protections.

It would destroy almost all of the tools that communities have used in recent years to rein in oil companies at a couple of drill sites and to successfully close two drill sites and achieve the plugging of all of their oil wells.

Here is some of what has been accomplished by communities:

- In 2014-16, the community around the Murphy Drill Site in CD 10 used the protections and tools in the City's Zoning Code regulating the oil industry to prevent installation of a gas burning flare.
- In 2015-2017, the community around the 4th Avenue Drill Site in CD 10, with the allegiance of Council Member Herb Wesson, used those protections and tools to obtain the plugging of all oil wells and the closure of the drill site (completed in 2018), which was adjacent to a public elementary school.
- In 2017-2018, the community around the Jefferson Drill Site in CD 8, with the allegiance of Council Member Marqueece Harris-Dawson, used those protections and tools to obtain the plugging of all oil wells (completed circa 2020) and the closure of the drill site.
- In 2017-2019, the community around the Rancho Park Drill Site in CD5 used those protections and tools to prevent installation of a gas burning flare.
- 2019 to present, the community around the West Pico Drill Site in CD5 has been using those protections and tools, and we think in the end we can secure the plugging of oil wells.

The City's largest drill site in the Wilmington section should be next. The Department of City Planning has told the LA Times and others that it will hold a ZA review to look at compliance violations. But now the Department of City Planning is proposing to throw out those protections and tools.

Look at the proposed draft ordinance. Almost all of it is composed of striking out and deleting text from Section 13.01 of the Zoning Code.

Here are some samples from the proposed draft ordinance of what it plans to delete:

From 13.01.E.2:

~~(i) A Zoning Administrator may impose additional conditions or require corrective measures to be taken if he or she finds, after actual observation or experience with drilling one or more of the wells in the district, that additional conditions are necessary to afford greater protection to surrounding property.~~

From 13.01.F:

~~1. That all pumping units established in said district shall be installed in pits so that no parts thereof will be above the surface of the ground.~~

~~2. That all oil produced in said district shall be carried away by pipe lines or, if stored in said district, shall be stored in underground tanks so constructed that no portion thereof will be above the surface of the ground.~~

~~3. That the operator of any well or wells in the district shall post in the Office of Zoning Administration a \$5,000 corporate surety bond conditioned upon the faithful performance of all provisions of this article and any conditions prescribed by a Zoning Administrator. No extension of time that may be granted by a Zoning Administrator, or change of specifications or requirements that may be approved or required by him or her or by any other officer or department of the City, or other alteration, modification or waiver affecting any of the obligations of the grantee made by any City authority shall be deemed to exonerate either the~~

~~grantee or the surety on any bond posted as required in this article.~~

~~9. That no refining process or any process for the extraction of products from natural gas shall be carried on at a drilling site.~~

~~18. That all production equipment used shall be so constructed and operated that no noise, vibration, dust, odor or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall ever be permitted to result from production operations carried on at any drilling site or from anything incident thereto to the injury or annoyance of persons living in the vicinity; nor shall the site or structures thereon be permitted to become dilapidated, unsightly or unsafe. Proven technological improvements in methods of production shall be adopted as they, from time to time, become available if capable of reducing factors of nuisance or annoyance.~~

Those are just a few examples. Here is the worst part:

By deleting all of 13.01.E and 13.01.H, the Department of Planning is proposing to eliminate many of the principal tools the public has used to force the ZA to hold public hearings when there has been non-compliance at drill sites.

At a Planning Department web-based presentation for Neighborhood Council Board Members, Planning told people that "Planning will have authority and process to call back operators when they are not acting in good faith or are posing a nuisance or danger to the surrounding community."

But the Planning Department is proposing to delete most of the safety and environmental protections from the code. Many violations would cease to be violations because there would no longer be City Code defining them as violations. And then Planning is proposing to delete the main Code sections authorizing ZA reviews for non-compliance and the authority for the ZA to order corrective measures.

Planning is not proposing to add any new mechanisms for inspection, monitoring, enforcement, or authority for the Zoning Administrator to do anything at all

Everyone who has watched the Rancho Park and West Pico Drill Site cases has seen a Planning Department (represented by the Zoning Administrator) that has not wanted to fulfill its responsibilities under the City Code. So the Planning Department is proposing to delete those responsibilities from the City Code and replace them with empty promises.

We think that the strongest argument against the ill-advised proposed ordinance is to show through the West Pico Drill Site case that oil wells operated by a serially non-compliant company can be plugged now, not maybe in 20 years or maybe never, but now.

How do we know that can be done? Because it has been done before, at the 4th Avenue Drill Site in CD10 (with the allegiance of then Council Member Herb Wesson) and at the Jefferson Drill Site in CD 8 (with the allegiance of Council member Marqueece Harris-Dawson).

So there is a choice:

There are remedies that have been proven to work when supported by the local City Council Member. There are remedies that actually get wells plugged.

And there is a proposed draft promise by the Planning Department that in 20 years, two decades after the expiring terms of current City Council Members are long forgotten, somehow things would be better and the wells will be plugged if almost all the rules are deleted.

Yours,

Prof. Michael Salman

Oils Email <planning.oildrilling@lacity.org>
To: Michael Salman <salman@history.ucla.edu>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:58 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA.

2 messages

Lynn Crippen <lynncrippen@gmail.com>

Tue, Aug 23, 2022 at 3:15 PM

To: planning.oildrilling@lacity.org

Cc: Mayor.helpdesk@lacity.org

Dear Honorable LA City Mayor and Council members:

I am writing to let you know that I am AGAINST the banning of oil and gas drilling.

I am a shareholder of Warren Resources. I have oil royalties that go back to my grandmother. I was hoping to leave this small token of to my grandchildren.

Warren resources is committed to conducting business lawfully, ethically, and responsibly.

They are good stewards of the land. We will benefit our posterity with the continued production of our natural resources, when done carefully.

They use discipline and ethical practices, while continuing to increase the demand for energy through the safe and responsible production of our natural resources.

Please reconsider allowing the wise and prudent production of oil and gas with Warren Resources.

Sincerely,

Lynn Crippen

La., California

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:41 PM

To: Lynn Crippen <lynncrippen@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-8464-CA

2 messages

'Jim hitt' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 24, 2022 at 9:08 AM

Reply-To: Jim hitt <jimhittwfg@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Jennifer Torres,

I am writing you to encourage your vote and direction on the banning of oil drilling in Los Angeles County. MY family has held oil rights for over 50 years and you are taking money out of our hands and giving it to other people sometimes in other countries in the name of environmental health. My argument is simple. Hold those that drill accountable for the safe extraction of oil. if those companies can not operate safely remove the companies. If there is a history of neglect or unsafe operations remove them. Stopping the drilling is not the answer.

I would love to discuss this further if you would like.

Sincerely,
James Hitt
Concerned Citizen

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:02 PM

To: Jim hitt <jimhittwfg@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC2022-4864-CA

2 messages

Cathy Hough <cathyhough39@gmail.com>
To: planning.oildrilling@lacity.org

Thu, Aug 25, 2022 at 6:41 PM

Attention Jennifer Torres

I support the intention to ban new oil and gas extractions, but request that consideration be given to allowing existing oil operations to continue.

Thank you for your consideration,
Cathleen Hough
1597 Kaunala Place
Hilo, HI 96720
Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Cathy Hough <cathyhough39@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:02 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Drilling Ordinance

2 messages

quote@allthread.net <quote@allthread.net>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 10:48 AM

We are in opposition to the changes of CPC-2022-4864-CA / CF17-0447. This is not the time to gamble – even 20 years out! The technology will not sustain the region.

With Regards,

Jerry Rothlisberger

President, National Tooling and Machining Association, SFV Chapter

President, RMI/Mag Hytec

14718 Arminta St

Panorama City, CA 91402

Oils Email <planning.oildrilling@lacity.org>
To: quote@allthread.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:13 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Expediente CPC-2022-4864-CA

2 messages

Magui Garcia <girlgargol@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 2:37 PM

Mi nombre es Margarita Garcia vivo en Wilmington CA

Generaciones enteras an enfermado en zonas aledañas a las refinerías que actualmente trabajan libremente a decir verdad con muy pocas restricciones. por años hemos solicitado que cierren pozos a más tardar en 10 años ya que la decisión de permitir que laboren por 20 años es mucho más riesgosa para nuestra salud y la de nuestros hijos que rápidamente enferman de asma , de enfermedades de la piel y que decir de nuestros adultos mayores que a mayor exposición a estos contaminantes an muerto de cáncer por ello pedimos seamos escuchados.

La solicitud se extiende a que estas empresas que se han enriquecido a costa de nuestra salud paguen por la limpieza de todos esos contaminantes ya que hemos invertido dinero en nuestra salud y es injusto que también tengamos que cubrir con nuestros impuestos la limpieza de los pozos .

Oils Email <planning.oildrilling@lacity.org>
To: Magui Garcia <girlgargol@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 2:42 PM

Hola,

Gracias por su correo electrónico. Se recibió y su respuesta se registrará como comentario público. Los comentarios públicos informarán la recomendación de Planificación de la Ciudad a la Comisión de Planificación de la Ciudad, quien escuchará la ordenanza y hará una recomendación al Concejo Municipal. La ordenanza propuesta está programada tentativamente para presentarse ante la Comisión de Planificación de la Ciudad el 22 de septiembre de 2022. La agenda final de la Comisión de Planificación de la Ciudad se publicará 72 horas antes de la fecha de la audiencia en nuestro sitio web de planificación:

planning.lacity.org/about/commissions-boards-hearings.

Para obtener más información sobre la ordenanza propuesta, visite el sitio web de la ordenanza:

<https://planning.lacity.org/ordenanza-de-perforacion-de-petroleo-y-gas>.

Gracias.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Feedback for the Banning of Oil Drilling

2 messages

Sande Rice <sanderice@gmail.com>
To: planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 9:26 PM

8/29/22

Jennifer Torres, Department of City Planning

[200 N. Spring St. #701](#)[Los Angeles, CA 90012](#)

RE: City of Los Angeles Ban on Oil and Gas Drilling

Case#CPC-2022-4864-CA

Dear Ms. Torres,

I am writing to express my disappointment that the city of Los Angeles is exploring the option of discontinuing oil drilling. My mother invested in oil rights on her property in the 1950s as a source of income and intended to pass the asset down to her heirs. It has been maintained in our family through the years, passed to my 2 sisters and me, and has now been inherited by my niece once my sister passed away recently. People currently receiving the oil royalties count on this income to live on, and it would be a shame to discontinue this income based on the stable recurring proceeds received through this date.

As a compromise, I request that consideration be given to phase out royalty income for those currently receiving it, as opposed to discontinuing it altogether. Perhaps one consideration is to disallow the royalties from being inherited moving forward.

I appreciate your time and consideration of this matter.

Sincerely,

Sande Rice

PO Box 18900

Long Beach, CA 90807

Sanderice@gmail.com

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:17 PM

To: Sande Rice <sanderice@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Fwd: Ban on oil and gas drilling Los Angeles CPC-2022-4864-CA

2 messages

Iwaynef via Planning Oil Drilling <planning.oildrilling@lacity.org>
Reply-To: lwaynef@aol.com
To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:07 PM

Dear Ms Torres,

I am writing to urge you not to ban oil and gas drilling in Los Angeles. Natural resources will become more important in the next few years, and Warren Resources is very responsible in it's job. My family depends on the income from this long time investment in the State of Calif. and it would be very difficult on us if you cut off our royalty payments. Please reconsider and allow responsible drilling to continue.

Sincerely,

Wayne Freeman
Long Beach, Calif.

Oils Email <planning.oildrilling@lacity.org>
To: lwaynef@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:29 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

FW: CPC-2022-4864-CA

2 messages

Ann Shonstrom <shonstroms@sbcglobal.net>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 10:17 AM

Dear Sir or Madam:

I understand your goals in proposing this ban on oil and natural gas extraction, however, I do not think you have considered all the unintended consequences.

I, as a senior citizen, have a limited income. This measure will ensure THREE (3) triple dips will come out of my fixed income which your ban will ensure. My quality of life will be seriously affected.

#1. My income will be significantly reduced by this ban. I need the amount I receive to continue to properly maintain my home and property.

#2. Infrastructure in California has not been upgraded enough to convert the energy from wind and solar to maintain current energy costs.

Therefore, the second dip will be the highly increased amount I will have to pay for energy.

#3. The third dip will come with the increased costs to convert wind and solar to the energy necessary for the production of goods. Inflation and higher prices, of course, will increase the amount I must pay for these products. All on my limited income.

Please, give strong consideration to the effects of this ban before your vote.

Thank you,

Ann Shonstrom

Oils Email <planning.oildrilling@lacity.org>
To: Ann Shonstrom <shonstroms@sbcglobal.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:30 PM

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

FW: Life without Petroleum1

2 messages

Ann Shonstrom <shonstroms@sbcglobal.net>

Thu, Aug 25, 2022 at 10:51 AM

To: councilmember.buscaino@lacity.org, planning.oildrilling@lacity.org

Please take the time to view the attached. I do not think you are fully aware of all the consequences of banning petroleum extraction.

ANN SHONSTROM

A concerned citizen

--

 **Life without Petroleum1.mp4**
1599K**Oils Email** <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:35 PM

To: Ann Shonstrom <shonstroms@sbcglobal.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Fw: Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

'Sabina Reddig' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 5:32 AM

Reply-To: Sabina Reddig <smreddig@verizon.net>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

On behalf of my aunt, Joyce Shinn.

Regards,

Sabina Reddig

----- Forwarded Message -----

From: Joyce Shinn <nouveauijoyce@gmail.com>**To:** Sabina Reddig <smreddig@verizon.net>**Sent:** Monday, August 29, 2022, 09:35:50 PM PDT**Subject:** Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

CPC-2022-4864-CA

The oil rights have been passed down as an inheritance in our family. Is it possible for you to consider phasing out all new oil drilling from now on in the city, while allowing the drilling to continue on the ones that people are currently benefiting from. Perhaps there could be an addendum stating that when the current beneficiaries pass on, then those wells will be closed and no longer drilled. In other words, the rights would not be inherited any longer. And therefore eventually all drilling will cease without harming the people who are receiving and counting on their royalty income now. That is our suggestion.

Thank you,

Joyce Shinn

nouveauijoyce@gmail.com

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:20 PM

To: Sabina Reddig <smreddig@verizon.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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9/12/22, 9:00 PM

City of Los Angeles Mail - Fw: Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Hi from pb, phyllis babila LA 90039 Thursday 9/1/2022....

2 messages

pbparlor@juno.com <pbparlor@juno.com>
To: planning.oildrilling@lacity.org

Thu, Sep 1, 2022 at 11:51 AM

NO MORE "OIL DRILLING"does ANYONE listen to the PEOPLE in this city or read the complaints against oil drilling? the poor communities & CHILDREN are suffering because of this, NOBODY likes it, it's ugly, dangerous, unnecessary & for personnel profit only !!! We need /want alternative energy/fuel....look to the future... you are so stuck in the past, behind the progressive nations & profit ridden that you can't see past \$\$\$ signs at the cost of others & our sick environment...This is SICK & PATHETIC that our useless, selfish, \$\$\$ grab councilmen & politicians think of themselves only. NO MORE OIL DRILLING !!! break the bad cycle here....do some good for the community, people, world.... you have LOST YOUR WAY !.....pb 9/1/2022 [3162 Hollydale Drive LA 90039](#)

Oils Email <planning.oildrilling@lacity.org>
To: "pbparlor@juno.com" <pbparlor@juno.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:16 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

In favor

2 messages

judie rosner <jrosner04@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 9, 2022 at 12:03 PM

I support the effort to reduce and eventually eliminate oil and gas drilling in Los Angeles, a city with millions of residents.

Judie Rosner
90291

Oils Email <planning.oildrilling@lacity.org>
To: judie rosner <jrosner04@gmail.com>

Mon, Aug 15, 2022 at 3:07 PM

Hello,

Thank you for email and apologies for the delayed response. Your email was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Los Angeles Petroleum Ordinance CPC-2022-4864-CA

2 messages

Nordstrand Engineering <nordstrandengineering@comcast.net>

Tue, Aug 23, 2022 at 12:41 PM

To: "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Dear Honorable Mr. Garcetti, Ms. Torres, Mr. Buscaino,

Its come to my attention that a petroleum ordinance is being considered that would, in effect, preclude any and all petroleum operations within your areas of jurisdiction. I'd like to suggest that a reasoned discussion be directed that considers not only the industry itself but its economic impact to all who are affected by energy ... or it's lack thereof.

First, as to the catalyst that drives this proposal, do know that petroleum operations can, and have been conducted in safe and environmentally friendly ways. I fully accept the premise of banning NEW drilling and FRACKING operations. However, the existing old school wells that are in production should continue to operate IF they're being operated in an ethical, safe and businesslike manner. For those that deviate from prudent practices, enforce corrective actions on the operator. To ban ALL operations due to adverse weather (global warming), media hype and community challenges would be a kneejerk reaction that we can all do without.

The many pumpjacks that exist (noisy, ugly, dirty) can be replaced with downhole pumps, just to afford one example as to how operations can continue without the extreme measures as currently proposed. No doubt, there are many compromises to be discussion items that should preceed draconian mandates.

There's the obvious economic benefit that the municipality currently enjoys from production taxes; revenues lost as a consequence of this proposed mandate. Consider also the smaller operators whose business you're shutting down. Is there to be any remuneration for the lost revenues to private business and individuals as a result of this proposed mandate? And what of the petroleum that's being denied to the country as a whole at a time when gas prices are high and petroleum demand is at a fever pitch?

I write to ask that you please consider this ordinance carefully and consider the many that it will impact.

Sincerely,

Joe Nordstrand
Nordstrand Engineering
Houston, Texas

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:32 PM

To: Nordstrand Engineering <nordstrandengineering@comcast.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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9/12/22, 4:35 PM

City of Los Angeles Mail - Los Angeles Petroleum Ordinance CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

mineral rights owners

3 messages

Jerry D Grissom <jgrissom61@gmail.com>
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 4:03 PM

Hello,

Since you're going to ban oil production from the LA city area, what happens to the people that own mineral rights, that means no more money for them. Is there any documents or any discussion going on about what's gonna happen to the mineral rights? I know there was a meeting, but I was unable to attend and I apologize for not knowing more than I do. Can you share any information with me?

Thans,
Jerry Grissom

Oils Email <planning.oildrilling@lacity.org>
To: Jerry D Grissom <jgrissom61@gmail.com>

Tue, Sep 6, 2022 at 4:26 PM

Hello,

Thank you for your email. We have received ample Public Comment regarding mineral rights and it will be considered in City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commision on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website: <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.
[Quoted text hidden]

Jerry D Grissom <jgrissom61@gmail.com>
To: Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 8, 2022 at 7:52 AM

Thank you for the information.
[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

NO on CPC-2022-4864-CA

2 messages

'Steve Rossi' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 10:10 PM

Reply-To: Steve Rossi <agentrossi@icloud.com>

To: planning.oildrilling@lacity.org

Greetings,

We are writing as strong proponents of environmental causes along with a strong understanding of the complex nature of oil production needs for our planet.

While on the surface it seems that banning oil & gas extraction is environmentally friendly, we don't believe this is the case when compared to what alternatives are viably available to produce energy and products. Even the most modern solar, wind, and other environmentally friendly producers of power require many products that currently can only be produced through natural gas &/or oil.

At a time when we are continuously overtaxing our current energy production and not actually creating any new producers, it seems irresponsible for us to stop oil and natural gas extraction when it is desperately needed.

Many of us have put in considerable effort and cost to reduce our own carbon footprint, but even with all the efforts possible to us today, we will continue to need oil and gas to help meet energy demands for years to come.

The only actually responsible action is to not enact the proposed oil and gas drilling ordinance, CPC-2022-4864-CA.

Thank you for your consideration.

Steve & Shelly Rossi

Concerned Citizens

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:45 PM

To: Steve Rossi <agentrossi@icloud.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

NO to ban on Oil & Gas drilling

2 messages

Andrea Leavitt <leavitt2@pacbell.net>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 9:26 AM

Jennifer Torres

Department of City Planning

Los Angeles, CA 90012

Planning.oildrilling@lacity.org

Dear Ms. Torres,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to **oppose** the proposed Oil & Gas Drilling Ordinance **CPC-2022-4864-CA** banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally. Further, as a state and country we should not be dependent on other sources of oil to such a challenging degree.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this short sighted approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Jonathan Leavitt

Sincerely,
Jonathan Leavitt

Oils Email <planning.oildrilling@lacity.org>
To: Andrea Leavitt <leavitt2@pacbell.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:09 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and gas ban proposal. Case CPC-2022-4864-CA

1 message

Mark Holiday <markholidaypga@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 24, 2022 at 8:19 AM

Jennifer,

It has come to our attention that the city of Los Angeles is contemplating banning oil and gas extraction in the city/county. We have a couple of questions that, hopefully, can be answered before the scheduled August 30th meeting. 1.) What are the reasons behind this proposal? 2.) Will the city/county be offering compensation to the mineral right holders for the taking away of their income? If not, why not? 3.) If domestic oil is restricted what countries will the United States import oil from to make up the shortfall?

Thank you for you quick response to this matter.

Mark and Kate Holiday

Case number CPC-2022-4864-CA



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling (CPC-2022-4864-CA)

2 messages

George Starbuck <ltlgoats@gmail.com>

Sat, Aug 27, 2022 at 1:33 PM

To: Mayor.helpdesk@lacity.org

Cc: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

George H. Starbuck IV
20100 Current Drive
Oregon City, OR 97045

Mayor Eric Garcetti
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012

August 27, 2022

Dear Mayor Garcetti,

As a native Californian, with roots that literally go back to the 1870's, when my Reynier family arrived from France and planted vineyards in Placerita Canyon, as well as several generations of Starbucks, I feel I must speak up. My great grandfather owned a property in Dominguez Hills, Number six, from 1906 to 1920. He sold the property but retained the oil well and minerals rights. I inherited it in 1971. Why am I telling you all this, because I feel I have a vested interest in my heritage and the state of California.

As a former engineer, and with a deep concern about the environment, I ask that the City of Los Angeles reconsider "phasing out" oil and gas drilling by "immediately banning" and the "cessation of all existing oil and gas operations". Please, consider the impact this action will have on those who depend upon the oil and gas pumped out of the city and county. To some, the meager income from such drilling may make the difference between existing and living. Hard times have fallen upon most of us, not just from the pandemic, but the results of it. I'm sure you hear about those effects, far more often than I do.

Until or unless our economic downturn reverses, and or we manage to eliminate all foreign oil now necessary for our country to move, literally, please reconsider your decision. Phasing out is one thing, however "immediate cessation" does not equate with "phasing out". Have we, as a nation, managed to arrive at a viable alternative, so far? We all know that has not happened and, for the foreseeable future, it may not happen in your lifetime. Therefore, banning existing drilling is a premature decision. Banning "new" drilling is logical, and certainly the first step in "phasing out" such endeavors.

The great City of Los Angeles and the state of California deserve nothing less than deep and abiding consideration for the millions who reside there, and have such a varied range of economic levels. Millionaires don't run the economy, in spite of their media coverage. The average worker, who ekes out a living and does the work to enable the millionaires to maintain their lavish lifestyle, keeps the wheels turning. Those "average workers" need to be considered first and foremost. I am not telling you anything you don't already know. I am just bringing it to the forefront so that you will reconsider their needs. This is urgent!

Thanking you in advance for reading this letter, and taking my suggestions to the forefront.

Sincerely,

George Henry Starbuck IV

PS: I no longer live in California because my retirement finances do not allow me to do so.

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 2:04 PM

To: George Starbuck <ltlgoats@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling

3 messages

'D. Brakefield' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 24, 2022 at 12:14 PM

Reply-To: "D. Brakefield" <dabrake@startmail.com>

To: Planning.oildrilling@lacity.org

Ms. Torres:

The proposed elimination of oil and gas operations in Los Angeles is economic suicide. Energy costs have exploded, with millions of Americans currently unable to pay their utility bills due to the collapsing economy.

There are currently no functional, reliable energy alternatives. None. Therefore, what actually is the goal of Los Angeles in eliminating one of the country's most valuable oil and gas fields? What is the goal?

This reckless, dangerous stunt will increase fuel costs and destroy jobs. Without energy - you cannot have a functional economy. The result will be higher prices that will slam the lower and middle working class and further erode the already declining quality of life in California.

Stop the insanity. Stop the ban on oil and gas drilling.

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:06 PM

To: "D. Brakefield" <dabrake@startmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]

'D. Brakefield' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:31 PM

Reply-To: "D. Brakefield" <dabrake@startmail.com>

To: Oils Email <planning.oildrilling@lacity.org>

I would appreciate learning who we should contact regarding our family's oil royalties that we depend upon each month if this ordinance is passed. Said royalty rights have been in our family since the 1930s. Certainly, Los Angeles officials will address this concern and guarantee our

legally guaranteed benefits will not be affected. We should not be damaged in exchange for the current green agenda that creates real victims.

Thank you Ms. Torres

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

oil and gas drilling cessation proposal

2 messages

Raymond York <york.ray6@gmail.com>

Tue, Aug 23, 2022 at 10:37 AM

To: "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

We are strongly opposed to this legislation due to the large number of people who are dependent on the royalty payments for their basic income. Please consider rejection of this proposal, or at least provide a substantial abatement period so those receiving royalties can at least have time to adjust their lives accordingly. Ray York

Sent from [Mail](#) for Windows

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:24 PM

To: Raymond York <york.ray6@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling Ordinance CPC-2022-4864-CA2 messages

Charlyn Jensen <charlynj@att.net>

Thu, Aug 25, 2022 at 5:33 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Jennifer Torres, City Planning
Mayor Eric Garcetti
Councilman Joe Buscaino

I was distressed to learn that you are planning to end Oil and Gas production in Los Angeles. Please do not do this.

My first objection is personal and I'll admit, motivated by self preservation. I own a small portion of an oil well in Wilmington that was purchased by my grandfather in 1940, that's 82 years ago. The royalty income from this investment has varied a lot over the years from almost nothing to over \$1000 per month and everything in between. I've seen first hand how this income has made a real difference in the lives of my family. It helped fund my grandparent's retirement. It helped pay medical bills for my father when he was very ill. It paid for necessary medication for my husband that we would not have been able to afford by other means. As a widowed senior citizen on the brink of retirement myself, I am depending on this income to be there for me as part of my retirement plan. Now you want to take my family's legacy from me.

It's easy to say that you are only taking from "big" oil companies and ultra rich investors, blaming the faceless "them". But I think you will find that many of the owners at Wilmington are not big companies or ultra rich billionaires. You'll find many others just like me, whose families made small, timely investments in helping to fuel our country. Others who cherish the legacy left them by their ancestors. Others who are depending on that income, even if it's just a few hundred dollars per month. We are not faceless, we are not rich. We do not desire to plunder the Earth for material gain without respect for the consequences. We are real people, small people, working people. We do wish to honor the legacy our families provided to us. We wish to continue to take part in providing necessary fuel to the country we love in a responsible way.

My second objection is more philosophical in nature. While I fully support the development of alternative sources of fuel, in fact I have solar on my home, we are far from the point where we can turn our back on these traditional sources of energy. I believe we should do our best to protect this planet for future generations but not to the point that we make hasty and ill advised sweeping declarations without thought to the consequences. Look what happened in Texas last year. Due to poor planning, people were inconvenienced, suffered brutally cold temperatures and lack of water and food and some even lost their lives. And for what? So that bureaucrats could say "Look what we did. We have wind turbines, we have solar panels. We don't need any backup plan!" Well it turns out they did need a backup plan. The current push in Los Angeles and California to electrify everything from cars to fireplaces and stoves is short sighted in the extreme. Where do you think the electricity comes from? We can only generate so much with wind, solar, hydro and nuclear sources. We are still very much dependent on our traditional fuels to generate the electricity we need to continue our modern way of life as we seek to develop additional cleaner alternatives. On the world stage, I believe it is vitally important to the security of our country that we make energy independence a priority. Too many foreign countries wish us harm. We would be foolish at best and down right neglectful to ignore that little fact. We need to utilize the resources we've been given and that includes our oil. We also need to do our best to make it as safe and clean as possible. To ban oil production outright before we have alternatives sufficiently in place is not the right thing to do. It's a half baked, hasty decree without a backup plan. It's a plan thought up by bureaucrats so they can pat themselves on the back while at the same time they put all of us at risk. Please be wiser than that. Don't put the cart before the horse. Be responsible, not reactionary.

~Charlyn

"If you cannot find happiness along the way, you will not find it at the end of the road."

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:55 PM

To: Charlyn Jensen <charlynj@att.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling Ordinance

2 messages

Sean McCarthy <sean@jacksonmccarthy.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Wed, Aug 10, 2022 at 6:16 PM

Planning,

How will the City of Los Angeles deal with potential emergency situations at the La Brea Tar Pits and Miguel Contreras Learning Center where there have been methane related construction problems?

How will problems of containing upward pressure as we experienced in the 1980's when the Ross Dress 4 Less store on 3rd Street near Park La Brea exploded and shut down the neighborhood for months be dealt with.

If Los Angeles shuts down the pumping stations along Pico Blvd, will it open itself to legal action should homes in Beverly Hills experience release of gas and oil caused by LA's pumping restrictions.

Should the City of Los Angeles also protect the public against Hydrogen Sulfide as well as oil extraction?

Why have all of the operational emergency and safety reference have been removed from the Ordinance?

I would appreciate a reply.

Sincerely,

Sean McCarthy

jacksonmccarthy.com

www.linkedin.com/in/seanmccarthy/

818-389-1876

Oils Email <planning.oildrilling@lacity.org>
To: Sean McCarthy <sean@jacksonmccarthy.com>

Thu, Sep 1, 2022 at 11:22 AM

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

We apologize for the delay in response. Thank you for your question and/or statement. It will be recorded as Public Comment and will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

OIL AND GAS DRILLING

2 messages

Carolyn Miller <carolynmiller1028@gmail.com>

Mon, Aug 22, 2022 at 11:56 AM

To: Planning.oildrilling@lacity.org

Cc: Mayor.helpdesk@lacity.org, ownerrelations@warrenresources.comkd

My family has held this property for decades. The City of Los Angeles actually contacted my mother and for \$1 purchased the property for a City street with the promise and guarantee that the property would never be changed.

The small amount of money that I receive from the slant drilling was promised by The City to never be taken away.

Please do not change now.

Carolyn Miller

1322 Allin Ln.

Banning, Ca. 92220

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 22, 2022 at 2:35 PM

To: Carolyn Miller <carolynmiller1028@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and gas operations

2 messages

Angie Rapalee <rapalee@gmail.com>
To: Planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 6:52 AM

Jennifer Torres, Department of City Planning
Re: Oil ban and gas drilling
Case #- CPC-2022-4864-CA

I would like to voice my opposition to the oil and gas ban. The continuing demand for energy and the rising prices do not support the cessation of oil and gas operations in Los Angeles.
Additionally, I am a Senior on a fixed income. I depend on my royalties as part of my income.
I implore you to reconsider this ban.
Sincerely,
Shirley Rapalee

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Angie Rapalee <rapalee@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:23 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil ban

2 messages

Kathy Sather <1cilantro1@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 11:31 AM

I am expressing my opinion that a ban on oil drilling in LA is not a responsible thing to do right now. We do not need to be even more dependent on foreign oil and the 2035 ban on gas cars is a long way off. Many jobs depend on the oil and no viable alternative is being offered.

Thank you!

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Kathy Sather <1cilantro1@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:18 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil drilling ,production, monitorium hearing.

3 messages

david oakley <wrenchit4u@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 23, 2022 at 10:00 AM

Dear mayor Garcetti,
Planning commissioner Jennifer Torres and city councilmember Joe Buscaino

I would like to voice my strong opposition to outlawing the oil production of currently producing Wells in LA county. Not only do I as a disabled senior rely upon the small royalty I get that helps me live independently in this time of monetary turmoil, but I can't believe you could deny independent citizens of their right to the royalties of oil properties that they own and pay taxes on and will basically make unsellable and worthless.

In today's politics where oil is being used to leverage political favor in Europe and here in the U.S., I believe that our oil dependency is a weakness for us and we should be looking at becoming more reliant on ourselves for oil production, unless you want to start learning Russian! I realize going green and pollution free is the big push this election cycle, but we are still reliant on oil and for some of us the small income it produces.. Whatever someone is trying to accomplish it seems very anti-productive at this particular junction. Thank you for your time
David Oakley/Joshua Oakley

david oakley <wrenchit4u@gmail.com>

Tue, Aug 23, 2022 at 12:50 PM

To: "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, planning.oildrilling@lacity.org, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:33 PM

To: david oakley <wrenchit4u@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

oil drilling case number: CPC-2022-4864-CA

2 messages

'Kathy Buscemi' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 10:04 AM

Reply-To: Kathy Buscemi <kibb2269@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

ATTENTION: Jennifer Torres, Joe Buscaino and Eric Garcetti

My name is Kathleen Buscemi. I was born here in the harbor area in 1945 to my parents, Gerald and Dorothy Mulligan that lived most of their lives at [1645 Gulf Avenue, Wilmington, Ca](#). When purchasing their home at that time they also received the mineral rights to this property. They continued to receive this small supplement throughout their lives, helping to raise their 4 children. My father worked for Union Oil during the war (WWII), construction thru the area until he finally worked for the Harbor Department in the L.A. Wilmington warehouse. This supplement was a vital portion of their income. After my father's passing it continued to help my mother, until her death in 2005 at 93 years old. She passed this supplement on to me, while my husband and I cared for her for her last 20 years.

At 77 years old and a widow, values this supplement as it continues to help with my living. Mother left me this supplement as her only inheritance. We, my husband and 4 children with their families, have continued to live in the San Pedro area for over 55 years. This supplement is very important to my small income and pray this will no be effected by the CITY OF LOS ANGELES BAN ON OIL AND GAS DRILLING. My case Number is CPC-2022-4864-CA. If you have any questions regarding this matter, please free in contacting me at kibb2269@yahoo.com or [2066 Stonewood Court, San Pedro, Ca 90732](#)

Regards

Kathleen I Buscemi

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:11 PM

To: Kathy Buscemi <kibb2269@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil Drilling ordinance CA 2022-4864-CA

2 messages

Marge NieLsen <mrgnielsen@gmail.com>

Mon, Aug 22, 2022 at 5:54 PM

To: planning.oildrilling@lacity.org

Cc: Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org

Dear Mayor Garcetti, Councilperson Joe Buscaino, And City Planner, Jennifer Torres,
My family has received letters from Warren Resources, the oil company where we have received income for a small part of resources from a Wilmington oil well. We were told that you are proposing an ordinance that may cut off our oil income. We are the third generation to receive income from the oil well. Although not a lot, the loss of the oil income would be difficult for some members of the family.

We have read that at some future time, the world will be ready for "electric everything." (None of us can afford an electric car at the moment). However, your ordinance is quite premature. With gas prices sky high and other problems with Russia and the world, your ordinance could be down right dangerous, if other U.S. counties follow suit. One only needs to look at the problems in Europe for prematurely going to too many other energy sources, without including enough gas resources. Texas certainly had their problems with the windmills that didn't work during a severe frost. There are many other examples. Please consider holding off of your ordinance, until there has been ample research, planning and resources and possibly other solutions. This seems to be some type of government over-reach! Although I am on a road trip (paying exorbitant prices for gas), I feel so strongly about the danger of the proposed ordinance that I may contact Fox News, when I have more information. I will be looking forward to your August 31st meeting for more details.

Respectfully,
Margaret Nielsen

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:19 PM

To: Marge NieLsen <mrgnielsen@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil drilling ordinance

2 messages

Jay Ross <ross_jay@hotmail.com>

Sat, Aug 13, 2022 at 10:30 AM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

To LA City,

I request that oil companies be required to post a bond that will cover full closure, cleanup and remediation.

These companies simply go bankrupt after sucking out profits and poisoning us citizens, and then we taxpayers are stuck paying the bill to clean up their mess while they happily spend their greedy profits.

The city should make decisions based on public health, not if businesses (small or large) can profit off pollution. They know the consequences of their poisonous actions, and should be ashamed of harming us.

J. Ross

West LA 90064

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 15, 2022 at 3:32 PM

To: Jay Ross <ross_jay@hotmail.com>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil Drilling

2 messages

Joseph & Jamie Apodaca Jr <junkyardjoe@msn.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Wed, Aug 10, 2022 at 10:18 AM

Brilliant! Angelenos are already suffering under some of the highest gas prices in the nation, and now you want to make it worse. Talk about a bunch of elitists! So instead of drilling here, where we actually care about the environment, we will now be supporting terrorist nations AND increasing our carbon footprint by having to ship oil and gas in from Russia, China, and Venezuela, who value profits much more than the environment.

By the way, what do you propose we USE to get to work and heat our homes? You know, or SHOULD know, that so-called "renewable energy" is in no way capable of meeting the current needs of California, hence the rolling blackouts and time-of-use restrictions on appliances. You guys quite simply don't care about the average Angeleno and how they have to work just to make ends meet. And I guess this email should tell you how I feel about your extremely short-sighted, feel-good posturing on the oil-drilling issue.

Oils Email <planning.oildrilling@lacity.org>
To: Joseph & Jamie Apodaca Jr <junkyardjoe@msn.com>

Mon, Aug 15, 2022 at 3:21 PM

Hello,

Thank you for email and apologies for the delayed response. Your email was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil royalty holder NOT in agreement with cessation of oil and gas drilling. Case Number CPC-2022-4864-CA

2 messages

lapanga@excite.com <lapanga@bluetiehome.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 9:18 AM

Dear Jennifer Torres,

I am writing to express my disagreement with the proposed elimination of oil and gas drilling within the County of Los Angeles.

This action will completely curtail royalties that have accrued for years after lawful and sometimes risky investment in the oil and gas industries in Los Angeles County.

This is tantamount to saying my banking savings account will no longer generate any interest payments since city officials so deem it.

The County, City, State and Country will continue to need and use fossil fuels while sustainable alternatives are found and safely produced.

Sincerely,

Christopher Good

Oils Email <planning.oildrilling@lacity.org>
To: "lapanga@excite.com" <lapanga@bluetiehome.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:11 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.



Jennifer Torres <jenny.torres@lacity.org>

Oil Site Cleanup

2 messages

peterks via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:50 PM

Reply-To: peterks@verizon.net

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

I definitely vote for cleaning up old oil sites, provided existing structures are left in place. On my street, it seems that practically every elderly person has gotten cancer. Not saying there's a connection but it sure seems like a possibility.

Peter Kolstad
3967 Coolidge Ave.
LA, CA 90066
310-490-2663

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:52 AM

To: peterks@verizon.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil & Gas Drilling Ordinance CPC-2022-4864-CA

2 messages

David & Susan Houser <housergoing@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Aug 26, 2022 at 8:47 AM

Dear Sirs,

We own property interests in the form of mineral rights located within the County of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Susan Houser

Manager

Seabright Anaheim Street Properties, LLC

Oils Email <planning.oildrilling@lacity.org>
To: David & Susan Houser <housergoing@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:06 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil & Gas Ordinance

2 messages

Patty Senecal <psenecal@wspa.org>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 9:02 AM

Is there a distribution list serve that I can sign up to receive information on the ordinance?

Patty Senecal

Senior Director, Southern California Region



970 W. 190th Street, Suite 304, Torrance, CA 90502

P (310) 808-2144 wspa.org

Oils Email <planning.oildrilling@lacity.org>
To: Patty Senecal <psenecal@wspa.org>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:25 PM

Hello,

Thank you for your interest in the Oil and Gas Drilling Ordinance. Your contact information has been added to the Interested parties list and you'll be notified of the progress of the Oil and Gas Drilling Ordinance. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposed to Oil Drilling Ban

2 messages

Tony Marshall <tony@larfo.com>

Fri, Aug 26, 2022 at 9:39 AM

To: Planning.oildrilling@lacity.org, Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org

Greetings City of Los Angeles Officials,

My family owns property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Tony Marshall

Seattle WA

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:10 PM

To: Tony Marshall <tony@larfo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposing Oil and Gas Drilling Ordinance CPC-2022-4864-CA

6 messages

Joe Flynn <joefflynn@versafabcorp.com>

Mon, Aug 29, 2022 at 10:28 AM

Reply-To: Joe Flynn <joefflynn@versafabcorp.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

Cc: "ownerrelations@warrenresources.com" <ownerrelations@warrenresources.com>, Patty & Richard Albright <patrich1@charter.net>, Kristian Albright <kalbrih@ix.netcom.com>, Christina Flynn <cflynn@versafabcorp.com>, Nicolle Larson <Nicolle@livewelltahoe.com>, Maria & Ruben Sanchez <sanchez94@charter.net>, Sharon Ban <banfamily@comcast.net>

CASE NUMBER ; CPC-2022-4864-CA

Dear Elected Officials, Jennifer Torres, Joe Buscaino and Mayor Garcetti :

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. Our mother Margaret Flynn was one of the few Native Daughters, born in Los Angeles in 1906, who lived in her Southern California home until her death at 85. Each day lived next to an operating well that she and My Father Joseph A. Flynn authorized to produce oil for our National Security and WW II War Effort.

The proposed ordinance does not consider our interests – nor the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Joseph & Elaine Flynn

Virus-free.www.avast.com

Oils Email <planning.oildrilling@lacity.org>
To: Joe Flynn <joefflynn@versafabcorp.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:15 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]

Christina Flynn <cflynn@versafabcorp.com> Mon, Aug 29, 2022 at 2:14 PM
To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org
Cc: ownerrelations@warrenresources.com, Patty & Richard Albright <patrich1@charter.net>, Kristian Albright <kalbrih@ix.netcom.com>, Joe Flynn <joefflynn@versafabcorp.com>, Nicolle Larson <Nicolle@livewelltahoe.com>, Maria & Ruben Sanchez <sanchez94@charter.net>, Sharon Ban <banfamily@comcast.net>, BRIANNAFLYNN2016@gmail.com

CASE NUMBER ; CPC-2022-4864-CA

Dear Elected Officials, Jennifer Torres, Joe Buscaino and Mayor Garcetti :

My family owns property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. My Grandmother Marguerite Flynn was one of the few Native Daughters, born in Los Angeles in 1906. She lived in the City of Los Angeles until her death at age 85. She lived next to an operating well that she and my Grandfather Joseph A. Flynn

authorized to produce oil for our National Security and WW II War Effort, knowing that this would de-value their property.

The proposed ordinance does not consider our interests – nor the fact that we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Christina Flynn

Oils Email <planning.oildrilling@lacity.org>
To: Christina Flynn <cflynn@versafabcorp.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 2:48 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

Nicolle Larson <nicolle@livewelltahoe.com> Mon, Aug 29, 2022 at 6:36 PM
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>, "ownerrelations@warrenresources.com" <ownerrelations@warrenresources.com>
Cc: Patty & Richard Albright <patrich1@charter.net>, Kristian Albright <kalbrih@ix.netcom.com>, Joe Flynn <joefflynn@versafabcorp.com>, Maria & Ruben Sanchez <sanchez94@charter.net>, Sharon Ban <banfamily@comcast.net>, Brianna Flynn <BriannaFlynn2016@gmail.com>, Christina Flynn <cflynn@versafabcorp.com>

Dear Elected Officials, Jennifer Torres, Joe Buscaino and Mayor Garcetti :

My family and I own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs, millions in state tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. Our grandmother, Margaret Flynn, was one of the few Native Daughters born in Los Angeles in 1906, who lived in her Southern California home until her death at 85. Each day lived next to an operating well that she and my grandfather Joseph A. Flynn authorized to produce oil for our National Security and WW II War effort.

The proposed ordinance does not consider our interests nor the fact we rely on this vested property to help feed our families and put food on our tables.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Nicolle Larson (Flynn)

Daughter of Joe Flynn
Property Owner #04844

Nicolle Larson, MEd, ATC

Founder

LiveNWell International

CELL 775.209.5585

www.livewelltahoe.com

Nicolle@livewelltahoe.com



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9K

Oils Email <planning.oildrilling@lacity.org>

To: Nicolle Larson <nicolle@livewelltahoe.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:13 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

opposition to CPC-2022-4864

2 messages

'Dennis Halladay' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 6:31 AM

Reply-To: Dennis Halladay <westdairy2@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "Mayor.helpdesk@lacity.org"

<Mayor.helpdesk@lacity.org>, "Councilmember.buscaino@lacity.org" <Councilmember.buscaino@lacity.org>

August 23, 2022

Jennifer Torres
Department of City Planning
Planning.oildrilling@lacity.org

Mayor Eric Garcetti
City of Los Angeles
Mayor.helpdesk@lacity.org

Councilman Joe Buscaino
City of Los Angeles
Councilmember.buscaino@lacity.org

Re: CPC-2022-4864

Good morning everyone.

I wish to express **my total opposition** to the proposed elimination of all oil and gas operations in Los Angeles County.

Such elimination would be dangerously shortsighted, given that we live in an energy supply world that is constantly changing and uncertain today – and impossible to predict in the future.

Eliminating any existing supply resources could potentially put the citizens of Los Angeles County, of California, and of the entire United States more at the whims of less responsible and perhaps predatory foreign energy producers in the future.

Eliminating local domestic production capacity would also adversely affect the financial well being of city, county, state and other U.S. residents who have oil and gas lease royalty payments as part of their incomes. Do the City and County of Los Angeles care at all what the effects would be on them?

Please do not adopt CPC-2022-4864.*signed:*

Dennis Halladay
[2462 E. Meadowgrass St.](#)

[Meridian, ID 83646](#)

Oils Email <planning.oildrilling@lacity.org>
To: Dennis Halladay <westdairy2@aol.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:21 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposition to oil and gas measure

2 messages

'Rosenzweig, Yoni' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 15, 2022 at 1:03 PM

Reply-To: "Rosenzweig, Yoni" <YoniRosenzweig@dwt.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

To whom it may concern:

I am writing in opposition to the upcoming motion to phase out oil and gas drilling over 20 years. The companies will not allow this to go in affect and over the next 20 years they will fight it. But if you implement robust plugging, maintenance, and fines they will be forced to close it more immediately. As drafted the plan does nothing to require robust annual inspections, 24/7 monitoring of the wells, mandatory environmental reviews, larger bonds for remediation, or enhanced funding for staff for real oversight of these dangerous aging wells.

Please amend and improve the bill

Yoni

Yonaton Rosenzweig

Partner

Davis Wright Tremaine LLP

865 S. Figueroa Street Suite 2400

Los Angeles, CA 90017

Tel: (213) 655-9642

Cell: (310) 270-5778

Website: www.dwt.com | [Bio](#)

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 15, 2022 at 3:48 PM

To: "Rosenzweig, Yoni" <YoniRosenzweig@dwt.com>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposition to Oil & Gas Drilling Ordinance CP-2022-4864-CA

2 messages

'azatty480' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 8:04 AM

Reply-To: azatty480 <azatty480@aol.com>

To: Planning.oildrilling@lacity.org

Jennifer Torres, Department of City Planning
[200 North Spring Street, Room 701](#)
[Los Angeles, CA 90012](#)

Dear Ms. Torres,

I own property interests in the form of mineral rights located within the City of Los Angeles. Additionally, I have other real estate investments in the City of Los Angeles and County of Los Angeles as well. I am contacting you to voice my opposition to the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of my vested property interest.

I understand the goals and objective of the Council regarding emissions and climate change, however oil and gas development in the City of Los Angeles has been and still is important to the local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

These mineral rights are a vested property right that my family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help support our family. The proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA would render our interests and investment worthless and cause a financial hardship upon us.

We urge you to reject this ordinance and work with us to find a less drastic approach.

Sincerely,

George Gialketsis

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:09 PM

To: azatty480 <azatty480@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposition to Proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA2 messages

robhwhitley@gmail.com <robhwhitley@gmail.com>
To: Planning.oildrilling@lacity.org

Sun, Aug 28, 2022 at 5:56 PM

August 28, 2022

Jennifer Torres, Department of City Planning

[200 North Spring Street, Room 701](#)[Los Angeles, CA 90012](#)Planning.oildrilling@lacity.org

(213) 978-3094

Dear Ms. Torres,

As an owner of mineral rights within the City of Los Angeles, I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA which bans new oil and gas extraction and implements "amortization" of my vested property interest.

The proposed ordinance will eliminate an industry that has been creating economic wealth in the Los Angeles community for over 100 years. In LA alone, more than 8,000 blue collar industry jobs will be lost. Moreover, there will be a ripple effect into the service sector that supports all Los Angeles residents. The ordinance continues the unfortunate trend of forcing commercial enterprises out of the area. All of Los Angeles will be a bit poorer if this ordinance is passed.

The proposed ordinance is also unfortunate because oil and gas development here in Los Angeles and California is done more cleanly and with more environmental oversight than anywhere in the world. If oil and gas production is halted here, the difference will be made up from international sources that do not have the same high environmental standards.

I urge you to reject this wrong-headed approach and consider instead the benefits to the families, workers and neighborhoods that rely on this industry.

Sincerely,

Robert Hoyt Whitley

[5011 Avenue B](#)[Torrance, CA 90505](#)

(310) 415-5490

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:02 PM

To: robhwhitley@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Opposition to Proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA

2 messages

Alison Fanning <aliwfang@gmail.com>
To: Planning.oildrilling@lacity.org
Cc: Alison Fanning <aliwfang@gmail.com>

Mon, Aug 29, 2022 at 5:25 AM

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
[Los Angeles, CA 90012](#)
Planning.oildrilling@lacity.org
(213) 978-3094

Dear Ms. Torres,

As an owner of mineral rights within the City of Los Angeles, I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA which bans new oil and gas extraction and implements “amortization” of my vested property interest.

While I understand the goals and objectives of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

The mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

I urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Alison Whitley Fanning
114 Snapper St.
Lakeway, Texas 78734
512-826-3087
aliwfang@gmail.com

Oils Email <planning.oildrilling@lacity.org>
To: Alison Fanning <aliwfang@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:08 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Ordinance CPC-2022-4864-CA

2 messages

Jane Mix <lajamx@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 9:45 AM

From: Jane G Mix
Trustee, Donna W. Graves Irrevocable Trust
1618 Park Ave
Sycamore, IL 60178

Aug 31, 2022

To: Jennifer Torres, Department of City Planning
[200 North Spring Street, Room 701](#)
[Los Angeles, CA 90012](#)

Regarding: Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

As the great granddaughter of Phineas Banning, one of Los Angeles earliest pioneers and entrepreneurs, I urge you not to pass ordinance CPC-2022-4864-CA.

Since the earliest days of Los Angeles history, transportation has been a large contributor to LA County's prosperity. As I understand it, the above-named ordinance would immediately ban new oil and gas extraction and require the end of all existing oil and gas operations. This would have a severe negative impact the transportation of LA County goods and services within the state and beyond. It would impact residents who would pay higher prices for fuel, energy and eventually, vehicles.

I understand the theory that a move to all electric vehicles would have a positive impact on the environment, however I must emphasize that electricity in California comes in large part from fossil fuels. Without oil and gas, how will electricity be generated reliably in the amounts required by an electric only fleet?

I strongly urge you not to approve ordinance CPC-2022-4864-CA. Instead, allow lawful, ethical and responsible energy companies to continue meeting energy demands in your state.

Sincerely,

Jane G. Mix
lajamx@gmail.com
815-899-2800

Oils Email <planning.oildrilling@lacity.org>
To: Jane Mix <lajamx@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:09 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Phasing out oil drilling in Los Angeles

2 messages

Catherine R <cmronan@gmail.com>
To: planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 6:05 PM

I am writing in support of the draft ordinance to phase out oil and gas drilling within the City of Los Angeles. Drilling contributes to our City's unacceptable air quality and to climate change. It especially impacts communities living on the frontlines who already experience the health effects of pollution. It needs to end. We are taking steps to reduce our reliance on oil and gas and, at the same time, need to begin reducing the supply. Banning new oil wells, eliminating the reworking of existing wells, phasing out the remainder, and plugging and cleaning them up as soon as possible are excellent policies. I appreciate the work of the City Planning Department on taking on this important task. I hope this can be accomplished in less than 20 years. Thank you.

--

Catherine Ronan

Oils Email <planning.oildrilling@lacity.org>
To: Catherine R <cmronan@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:10 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Plans for Development?

2 messages

Tatiana Morrison <tatmorr@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 12:10 PM

Hi, I would like to be included on all updates. My concern is that once the oil drilling ceases, developers will convert the land to housing and commercial that Los Angeles does not need nor can it afford in terms of existing infrastructure limitations. Please dedicate the land to wilderness conservation. Offer incentives for current well owners to stay and reuse the land for clean/green energy. Consider alternatives. Thank you.

Tatiana Morrison

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>
To: Tatiana Morrison <tatmorr@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:20 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. You have also been added to the Interested Parties List and you'll be notified of the progress of the Oil and Gas Drilling Ordinance. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website: <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

James Reeves <mailagent@thesoftedge.com>

Sat, Aug 27, 2022 at 6:00 PM

Reply-To: Reevesj@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

James Reeves

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:48 AM

To: Reevesj@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Fox Boswell. M.D. <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 7:52 PM

Reply-To: foxboswell@verizon.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Fox Boswell. M.D.

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:46 PM

To: foxboswell@verizon.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

4 messages

Ron Rose <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 12:22 PM

Reply-To: rcajrose@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Ron Rose

Herb Johnston <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 12:44 PM

Reply-To: calvary7@protonmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Herb Johnston

Oils Email <planning.oildrilling@lacity.org>
To: rcajrose@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:26 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: calvary7@protonmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:27 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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9/12/22, 4:42 PM

City of Los Angeles Mail - Please reject actions that increase energy prices: CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please stop all drilling

2 messages

Terenig Topjian <terenig@gmail.com>
To: planning.oildrilling@lacity.org

Fri, Aug 19, 2022 at 11:02 PM

No seriously, SERIOUSLY

And make oil/gas companies pay for capping and cleanup.

I'm a 20 year resident of Sherman Oaks. Thanks 🙏

Oils Email <planning.oildrilling@lacity.org>
To: Terenig Topjian <terenig@gmail.com>

Mon, Aug 22, 2022 at 2:19 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposal to ban oil/gas extraction. Case CPC-2022-4864-CA

2 messages

Mark Holiday <markholidaypga@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 24, 2022 at 8:00 AM

Jennifer, It has come to our attention that the city of Los Angeles is contemplating banning oil and gas extraction in the city/county.

We have a couple of questions that, hopefully, can be answered before the scheduled August 30th meeting. 1.) What are the reasons behind this proposal? 2.) Will the city/county be offering compensation to the mineral right holders for the taking away of their income? If not, why not? 3.) What countries, other than the United States, will we be importing oil from in order to make up the shortfall if we cease using domestic oil?

Thank you,

Mark and Kate Holiday

Case number. CPC-2022-4864-CA

Oils Email <planning.oildrilling@lacity.org>
To: Mark Holiday <markholidaypga@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:26 AM

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed ban on oil and gas drilling

2 messages

Stephen Shoop <shoopsa@gmail.com>

Sat, Aug 27, 2022 at 2:08 PM

To: mayor.helpdesk@lacity.org, planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

Dear Mayor Garcetti, Ms. Torres, and Councilman Buscaino:

Although no longer a Los Angeles resident, LA is my hometown and where my family and I lived for many decades. My father was an aviation pioneer and executive, and an Air Force major general, at the time of his death the Commander of the California Air National Guard. My mother was a movie actress (Julie Bishop). Their generation, as well as those preceding and following, loved the city and invested in Los Angeles' economic development and success. This included investments in fossil fuels and exploiting this important resource for the benefit of the city, state, and country. In a city (and mismanaged state) where wokism, political correctness, and virtue signaling rule the day—and where brownouts remain a real risk-- they would have been appalled, as I am, at an irresponsible decision to ban oil and gas production.

By decreasing domestic fossil fuel production, will this ban help lower Angelinos' gas prices? Will it help in our country's energy independence and thus support our national security? Of course not. Will it win some woke votes and virtue brownie points? It quite probably will, so your agenda and priorities appear clear.

History will judge you and such a ban harshly. Renewables are great, but they're not ready to take up the slack caused by a premature abandonment of fossil fuels.

I urge you to oppose and defeat this irresponsible folly.

Sincerely,

Stephen A. Shoop, MD

[103 Comforter Lane](#)

[Clear Brook, VA 22624](#)

shoopsa@gmail.com

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:45 AM

To: Stephen Shoop <shoopsa@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Ban on Oil and Gas Extraction in City of Los Angeles

3 messages

'Patricia Kourt' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Sat, Aug 13, 2022 at 2:13 PM

Reply-To: Patricia Kourt <wpkourt@me.com>

To: planning.oildrilling@lacity.org

To Whom it may concern:

Referring to draft Ordinance NO _____ which I downloaded from your website:

1. Page 3, Section 7, Paragraph 3: "Los Angeles City Oil Field Area shall mean all land in the City within the areas identified on the maps in Ordinance No. 156, 166 located in Council File No. 80-3951"
Could you tell me how I can obtain a copy of those maps?

2. Page 3, Section 7, Paragraph 4: "Nonurbanized Area shall mean all those portions of the City which the City Planning Commission or Council has determined will not be detrimentally affected by the drilling, maintenance, or operation of oil wells". Has the Planning Commission identified such areas and can you give me a description of such areas?

Thank you and I shall look forward to receiving this information.

Sincerely,

Warren K. Kourt
Warren K. Kourt & Associates, Inc.
Petroleum Consultants

Please reply to wpkourt@aol.com

'Patricia Kourt' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 17, 2022 at 8:01 AM

Reply-To: Patricia Kourt <wpkourt@me.com>

To: planning.oildrilling@lacity.org

Could someone please reply to this? Thanks

Warren Kourt
[Quoted text hidden]

Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 8:23 AM

To: Patricia Kourt <wpkourt@me.com>

Cc: planning.oildrilling@lacity.org

Good morning, Thank you for your question.

Please find Ordinance 156,166 attached for your reference and illustration of the referenced map.

L.A. City Planning does not have complete records of Non-Urbanized oil and gas extraction sites, but can confirm that there is only 1 controlled drill site, as defined in LAMC 13.01, in a Non-Urbanized Oil Drilling District and it is located in the Wilmington neighborhood of the city.

For your reference, the proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

Thank you.
[Quoted text hidden]



80-3951_ORD_156166_12-08-1981.pdf

349K



Jennifer Torres <jenny.torres@lacity.org>

Proposed Cessation of Oil and Gas Drilling

3 messages

'John Wright' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 1:00 PM

Reply-To: John Wright <wrightjm3@yahoo.com>

To: planning.oildrilling@lacity.org

I understand that the City of Los Angeles is considering elimination of all oil and gas operations within the County of LA. If that is the case, I want to strongly object. My family has owned mineral rights for many years and relies on the royalty income from these operations. Please do not do any work to make this a reality. Thank you

Sincerely,

John M Wright III

'John Wright' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 1:11 PM

Reply-To: John Wright <wrightjm3@yahoo.com>

To: planning.oildrilling@lacity.org

This email is in reference to CASE CPC-2022-4864-CA

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:43 PM

To: John Wright <wrightjm3@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Cessation of Oil and Gas Operations

2 messages

bwz052548 via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 1:44 PM

Reply-To: bwz052548@aol.com

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

To: Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

I understand that the City of Los Angeles is considering elimination of all oil and gas operations within the County of LA. If that is the case, I want to strongly object. My family has owned mineral rights for many years and relies on the royalty income from these operations. Please do not support and pass this ordinance. Thank you.

This is in reference to CASE CPC-2022-4864-CA

Sincerely,

Barbara Whisman

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:11 PM

To: bwz052548@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Los Angeles City to ban oil and gas drilling, ordinance, CPC-2022-4864-CA

2 messages

Margaret Hansen <marjehansen77@gmail.com>

Wed, Aug 24, 2022 at 11:57 AM

To: Planning.oildrilling@lacity.org, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>,

"mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

Cc: ownerrelations@warrenresources.com

To Whom This Will Concern:

I realize this is all "political". Be that as it may, my husband and I invested in purchasing mineral rights to properties we owned. After my husband died, this investment helped support me and my children. And now, it is supplementing my retirement.

The City of Los Angeles gained wealth from the oil found in the Wilmington field. I'm sure you are still gaining from this endeavor. I urge you to refrain from this ban and allow those of us who rely on this income to continue to do so.

Sincerely,
Margaret A. Hansen

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:05 PM

To: Margaret Hansen <marjehansen77@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Mark Espoy <mark@markespoy.com>
To: Mark Espoy <mark@markespoy.com>
Bcc: Planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 7:58 AM

Dear Sirs and Madam,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,
Mr. Mark Espoy

Oils Email <planning.oildrilling@lacity.org>
To: Mark Espoy <mark@markespoy.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:08 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

PROPOSED OIL AND GAS DRILLING ORDINANCE, CPC-2022-4864-CA

2 messages

Ivan Murat <imdecime71@sbcglobal.net>

Tue, Aug 23, 2022 at 3:11 PM

To: planning.oildrilling@lacity.org, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

To: whom it may concern

First of all, I must say, I am very surprised and disappointed with such a proposal.

It makes no sense whatsoever, and that is so for several reasons.

Primarily, it is clear that the whole community is benefiting from such operation being here, in our midst. Financially, economically and as a community which has benefited from

the fact that we do have such resources here for many years. We are fully aware that we are on the verge of a huge energy crises, which will probably affect the whole world, including our city and our nation as whole.

Why give up on the resource that is already here, and has been used for many years? It has been heavily regulated, as you know. Companies that have been drilling and extracting oil and gas have invested huge amount of money to comply with all the regulations imposed on them. The local communities have been heard for all their objections, which have been addressed by these companies, and now in fact support these companies and their operations.

We all have this vision of the perfectly clean environment, clean energy, clean air etc. and yet we are not even close to providing the alternatives which will in fact address the growing needs for energy.

There are so many issues with this noble idea of everything clean and environment friendly right now, and most of all it's a politically generated dream which is only interested in votes.

And you politicians have the most responsibility to control such a frenzy in demanding the unrealistic plan to switch so quickly. Especially because that will of course increase the cost of energy, and ultimately increase the level of poverty in our city and in general. Electric cars and trucks did not and will not solve the problem, at least not so soon as you politicians are promising.

Where is all that electricity going to come from? sun & wind? Not very soon, since we didn't even come close to what the need is going to be once all the electric cars hookup to the grid.

Again, need for political support is driving this dreamlike agenda which has obviously arrived at the city of Los Angeles as well. Please wake up and look at the reality, take a moment and realize

that we cannot afford to go ahead with such a plan, not now, and not without widespread consequences which will cost tremendous amount of money, and you tell us we do not have it.

Gas prices are driven up by such a dream as well and who is behind it all? Well, the same people that make all the billions of dollars out of our pockets right now, so why not help them get richer yet.

And who will help them but those who know the best how to impress them by pushing through unreasonable and unsustainable legislature supported by uninformed voters.

Please don't.

Thank you

Ivan Murat

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:39 PM

To: Ivan Murat <imdecime71@sbcglobal.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed oil and Gas Drilling Ordinance,CPC-2022-4864-CA

2 messages

'Billy Ray Buckner' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 1:15 PM

Reply-To: Billy Ray Buckner <brbuckner@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Dear Jennifer Torres,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing “amortization” of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help provide income for our families.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

William Ray Buckner
5484 E. FM 20
Lockhart, Texas 78644
brbuckner@yahoo.com
830-857-6134

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:29 PM

To: Billy Ray Buckner <brbuckner@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance

2 messages

Patty & Richard Albright <patrich1@charter.net>

Fri, Aug 26, 2022 at 11:23 AM

To: Planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, Mayor.helpdesk@lacity.org

Cc: ownerrelations@warrenresources.com, Joe Flynn <joeflynn@versafabcorp.com>, Maria Sanchez

<Sanchez94@charter.net>, Kristian Albright <kalbrih@ix.netcom.com>, Nicolle Larson <Nicolle@livewelltahoe.com>,

Christina Flynn <CFlynn@versafabcorp.com>

Case Number: CPC-2022-4864-CA

Dear Elected Officials, Jennifer Torres, Joe Buscaino and Eric Garcetti,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. Our mother Margaret Flynn was one of the few Native Daughters, born in Los Angeles in 1906, who lived in her Southern California home until her death at 85.

The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Patricia M. Flynn Albright

Virus-free. www.avast.com

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:21 PM

To: Patty & Richard Albright <patrich1@charter.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance

2 messages

Kim Moreno <quingem@gmail.com>

Tue, Aug 30, 2022 at 10:42 AM

RE: CPC-2022-4864-CA

Dear Sirs and Madams,

Please do not ban oil and gas drilling under the city of Los Angeles.

My grandfather bought a share of a well in Wilmington when my father was born in 1937. It has been passed down in our family and currently I own the share. This small income has helped support me over the years and it would be a great hardship to me to lose it.

You may believe that banning oil and gas will help with the climate, etc. I believe, in the long run, you are wrong.

Sincerely,

Kim Moreno

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:32 PM

To: Kim Moreno <quingem@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance: meeting recording

2 messages

Lagudis, Susana@Waterboards <Susana.Lagudis@waterboards.ca.gov>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 8:22 AM

Hello: Is a recording of Tuesday evenings public meeting available for public viewing?

Please advise, and thanks

Susana Lagudis, Public Participation, Environmental Justice and Tribal Coordinator

Los Angeles Regional Water Quality Control Board

<https://www.waterboards.ca.gov/losangeles/>

tel: 213.576.6694

Please note:

Due to COVID-19, I am teleworking on a full-time basis.

E-mail is the best way to reach me for immediate assistance.



Planning Oil Drilling <planning.oildrilling@lacity.org>
To: "Lagudis, Susana@Waterboards" <Susana.Lagudis@waterboards.ca.gov>
Cc: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 8:48 AM

Good morning. Thank you for your inquiry.

Yes, of course. Included in this email is a Google Drive link to a recording of the hearing.

The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

If you or any other agency staff have questions and/or comments, please do not hesitate to reach out to us. Thank you.

 [8-30-2022 Oil Drilling LA City Planning hearing...](#)

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Ordinance: CPC-2022-4864-CA

2 messages

'Imartel2' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 1:01 PM

Reply-To: Imartel2 <Imartel2@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

Jennifer Torres, Department of City Planning

I am opposed to the proposed Ordinance. My wife and I are retired and are dependent on the Royalty payments we have been receiving over the years for our livelihood.

While I can understand the concerns some people may have about new exploration and drilling in their neighborhoods, I cannot believe the cessation of all oil and gas operations is in the public interest, and it would adversely impact us and many others in our situation.

Respectfully,

Louis V. Martel

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 1:13 PM

To: Imartel2 <Imartel2@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Public Comment

2 messages

Michael Chaskes <chaskes1@gmail.com>

Tue, Aug 30, 2022 at 8:21 PM

To: planning.oildrilling@lacity.org

Cc: Mike Bonin <mike@11thdistrict.com>

Hello! I've been a resident of the City of Los Angeles for 31 years, and I'm writing to express my strong support for the City Council's recently-passed ordinance to end oil drilling in the City.

I urge the City to implement this ordinance promptly, and to shorten the phase-out period -- 20 years is a long time for Angelenos to continue suffering the ill effects of drilling. I also urge the City to maintain and expand health protections during the phase-out, including an immediate end to dangerous practices such as acidization. Finally, the City should insist that oil companies take financial responsibility for cleaning up their mess, by paying for well plugging and site clean-up, as well as for promoting redevelopment of the affected areas for the benefit of impacted residents.

Thank you for your consideration.

Michael Chaskes
Los Angeles, CA 90064
(Mar Vista / Council District 11)

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:04 AM

To: Michael Chaskes <chaskes1@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Public Comment_Protect Playa Now

2 messages

Protect Playa <protectplayanow@gmail.com>
To: planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 6:48 PM

To whom it may concern at the planning department,

Protect Playa Now is a collection of concerned citizens mobilizing to protect Playa del Rey (PdR), Playa Vista and the surrounding communities from the threats posed by Los Angeles' fossil fuel infrastructure. We ask the City of Los Angeles to move promptly to adopt the proposed draft ordinance to make drilling for oil and gas a non-conforming land use. Continuing to drill for oil and gas in our congested and polluted City is not a viable option. As numerous studies have shown, oil and gas drilling is harmful to our health and the climate. Frontline residents living close to these wells and, often, other sources of pollution are by far the most impacted. The struggle for environmental justice calls for us to act with urgency to end oil drilling in our city.

We can strengthen the draft ordinance by shortening the phase-out period from the existing 20-year time frame; requiring oil companies to plug the wells and clean up the sites as they are shut down; and maintaining existing health protections during the phase-out period. We support the language in the draft ordinance which immediately bans maintenance activities such as acid treatment, reworking, and sidetracking. In aging oil and gas fields such as those found in Los Angeles, maintenance and reworking of existing wells to enable continued production is more common than drilling new wells.

We appreciate the work of the City Planning Department for giving us the opportunity to have our voice heard and for taking on this important task.

Thank you,
Faith Myhra

ProtectPlayaNow.org

[Twitter](#)

[Facebook](#)

[Youtube](#)

Oils Email <planning.oildrilling@lacity.org>
To: Protect Playa <protectplayanow@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:15 PM

Hello,

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Thank you.

9/12/22, 8:59 PM

City of Los Angeles Mail - Public Comment_Protect Playa Now

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Public Drilling Regulation

2 messages

Matt Wait <mattw@knock.la>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 9:10 AM

To whom it may concern:

I strongly support the proposed ordinance that will zone out oil drilling citywide. This is needed in addition to existing regulations for public health and safety.

--

Cheers,

Matt Wait
Music Writer, [KNOCK.LA](https://knock.la)



Oils Email <planning.oildrilling@lacity.org>
To: Matt Wait <mattw@knock.la>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:25 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Public Hearing re: CaseNumber CPC-2022-4864-CADear

1 message

pat Foster <chris9kringle@gmail.com>

Wed, Aug 31, 2022 at 11:23 AM

To: planning.oildrilling@lacity.org

Cc: "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org"

<councilmember.buscaino@lacity.org>

Dear Ms. Torres, Mayor Garcetti and Councilman Buscaino,

I realize the aforementioned hearing has already happened, but I still want to make my opinion noted. I currently own minerals rights for a small percent of ownership with Warren E&P INC. and receive monthly royalty checks each month. My grandfather originally purchased these rights in the early 1900's, then they passed to my father and then on to me at the death of my father. I am planning to pass them on to my children.

In all these years of ownership, it appears that Warren E&P , INC, has been committed to conducting business lawfully, ethically and responsibly. They have managed their assets with operational and capital discipline, and have been committed to meeting the increasing demand for energy through the safe and responsible production of our natural resources. I will wait to hear that the results of the hearing will NOT see the city of Los Angeles eliminate oil and gas operations in the County of Los Angeles.

A few questions for you:

Why are you wanting to stop oil production?

What legal or constitutional right do you have to take away another's rights?

How do you plan to subsidize my loss?

Thank you for your attention to my concern. I will be interested to hear the results of the hearing if there are any yet, and any answers you may have to my questions.

Sincerely,

Patricia H. Foster



Jennifer Torres <jenny.torres@lacity.org>

questions regarding ordinance

2 messages

Kathy Schaeffer <kathys3115@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 6:51 PM

How long will it take for the amortization study to be completed and what is an estimated time for its start?
Will facilities be closed when they reach a specific date as per the amortization study? If so, how much time will they have to close after notified by the city that they have recouped their capital investments?

Thank you,
Kathy Schaeffer

Planning Oil Drilling <planning.oildrilling@lacity.org>
To: Kathy Schaeffer <kathys3115@gmail.com>
Cc: planning.oildrilling@lacity.org


Thu, Sep 1, 2022 at 8:37 AM

Good morning. Thank you for your question.

The Mayor and Los Angeles City Council directed the Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) to prepare an amortization study. That City office is in the process of securing a consultant to prepare the study. Depending on the results of this study, there may be future code amendments, by the Department of City Planning, requiring individual wells to shut down sooner in instances when the operator has recouped their investments prior to the proposed 20-year amortization period as stipulated under the draft ordinance. Please see the attached Council File instructions for this specific language.

The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

Thank you.
[Quoted text hidden]

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Jennifer Torres <jenny.torres@lacity.org>

Re Public comments on oil drilling

2 messages

Char Rothstein <charwhnc@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 1:49 PM

To Whom it may concern,

Oil drilling should continue as oil is a necessary fuel. Today, we have been advised NOT to charge electric vehicles due to the strain on our systems because of extreme heat. In winter, we could face the same advice due to the cold.

Removing idle drills and keeping the drilling away from schools, homes and all public and private facilities is only logical.

Thank You,
Charlene Rothstein
West Hills Ca 91304

Oils Email <planning.oildrilling@lacity.org>
To: Char Rothstein <charwhnc@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:55 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Ref (Draft Ordinance # CPC-2022-4864-CA

2 messages

'Tom Kaveney' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 5:51 PM

Reply-To: Tom Kaveney <irishrover52@aol.com>

To: "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "jbradley@warrenresources.com" <jbradley@warrenresources.com>

Cc: "robbins.g@att.net" <robbins.g@att.net>, "blondiee_98@yahoo.com" <blondiee_98@yahoo.com>, "lilacabrera@aol.com" <lilacabrera@aol.com>, "rita.peckham@me.com" <rita.peckham@me.com>, Tom Kaveney <irishrover52@aol.com>

To: Whom It May Concern

Kaveney family who are oil/mineral rights owner in the Los Angeles City Harbor basin oppose draft ordinance # CPC-2022-4864-CA below are our comments.

Ref (Draft Ordinance # CPC-2022-4864-CA)

The Kaveney family who are oil rights owners with property interests in the form of mineral rights located within the City of Los Angeles Harbor Basin oppose the draft ordinance listed above.

We understand the goals and objectives of the Council regarding emissions and climate change, and oil and gas development in the City of Los Angeles, is important to the people and our local economy. The oil industry provides essential jobs and millions in state tax revenue, and the oil and gas produced in the City of Los Angeles Harbor basin must follow strict safety, health and labor standards.

The Kaveney family oppose the Draft Ordinance # CPC-2022-4864-CA).

Reason: Planning committee not considering the rights of people who own the subject property and mineral rights. Our mineral rights are our vested property rights that the Kaveney and other families, who are oil owners, use to supplement their income for over five plus generations.

Health issues concerns: The Kaveney family have lived in the City of Los Angeles Harbor Basin for over five generations, and no one in these generations has ever been ill due to living around these oil resources. Kaveney surviving members ages range from 70s to 80s.

The Kaveney family urges you to reject this ordinance and develop a strategic task force to work with oil rights owners, oil industries, and the City of Los Angeles to find a better solution to this problem before this Ordinance is passed as written.

Sincerely,

Thomas R. Kaveney (06267)
 IrisAnn L. Kaveney-Robbins (11031)
 Ellen L. Kaveney-Stacy (05575)
 Lila M. Kaveney-Caberra (01728)
 Rita D. Kaveney-Peckham (10456)

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:08 PM

To: Tom Kaveney <irishrover52@aol.com>, "jbradley@warrenresources.com" <jbradley@warrenresources.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA2 messages

emackay@apeleather.com <emackay@apeleather.com>

Sat, Aug 27, 2022 at 10:14 AM

Reply-To: emackay@apeleather.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Ellen MacKay

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:59 PM

To: emackay@apeleather.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA5 messages

Darren Engel <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 7:36 PM

Reply-To: 20grantwoodlane@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

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Case Number: CPC-2022-4864-CA

Sincerely,

Darren Engel

Stanley Scott <mailagent@thesoftedge.com>

Sat, Aug 27, 2022 at 7:24 AM

Reply-To: psalighting@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

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Case Number: CPC-2022-4864-CA

Sincerely,

Stanley Scott

Mary Engstrom <mailagent@thesoftedge.com>

Sat, Aug 27, 2022 at 9:34 AM

Reply-To: Marytce@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Mary Engstrom

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:58 PM

To: psalighting@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 1:58 PM

To: 20grantwoodlane@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA

2 messages

rogerhaskins@roadrunner.com <rogerhaskins@roadrunner.com>

Sat, Aug 27, 2022 at 11:00 AM

Reply-To: rogerhaskins@roadrunner.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

roger haskins

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 2:00 PM

To: rogerhaskins@roadrunner.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA6 messages

Alonzo Hill <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 11:42 AM

Reply-To: retsagbear@gmail.com

To: planning.oildrilling@lacity.org

Dear Proposed Oil and Gas Drilling Ordinance:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Alonzo Hill

Naomi Nightingale <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 12:02 PM

Reply-To: poetryismything1@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Naomi Nightingale

Walter Morales <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 4:26 PM

Reply-To: wsmorales661@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Walter Morales

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 7:23 PM

To: retsagbear@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: poetryismything1@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 7:23 PM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: wsmorales661@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 7:23 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

9/12/22, 8:45 PM

City of Los Angeles Mail - Reject actions that will increase energy prices: CPC-2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

request for environmental documents in CPC-4864-CA and ENV-2022-4864-EAF

1 message

Michael Salman <salman@history.ucla.edu>
To: planning.oildrilling@lacity.org
Cc: jennifer.torres@lacity.org, lilian.rubio@lacity.org

Fri, Aug 26, 2022 at 3:26 PM

Dear Ms. Torres or other staff receiving this email

The Case Information system page for the proposed oil ordinance, CPC-4864-CA, lists ENV-2022-4865-EAF as a related case. No "initial submittal documents" are posted under either case number.

Would you please send me a copy of whatever documents exist in the file for ENV-2022-4865-EAF and whatever environmental clearance related documents exist in the file for the underlying case (CPC-4864-CA)?

If there is delay in sending the documents, would you please at least tell if ENV-2022-4865-EAF is only an Environmental Assessment Form at present, or has there been an Initial Study, or something less or something more?

If there are no environmental documents (not even an EAF?), then please let me know.

Thank you,

Michael Salman



Lilian Rubio <lilian.rubio@lacity.org>

request for environmental documents in CPC-4864-CA and ENV-2022-4865-EAF

Michael Salman <salman@history.ucla.edu>

Wed, Aug 31, 2022 at 11:13 AM

To: planning.oildrilling@lacity.org

Cc: lilian.rubio@lacity.org

CPC-2022-4864-CA; ENV-2022-4865-EAF : request for copies of EAF & all environmental study & clearance-related documents

Dear Ms. Torres, Ms. Rubio, or other staff receiving this email

I am sending you a second copy of my August 26 email (below) requesting copies of all documents related to environmental study & clearance for CPC-2022-4864-CA & ENV-2022-4865-EAF, including the EAF form, any studies (initial or otherwise), and any other documents related to environmental clearance.

Will you, please, be able to send me electronic copies of these documents?

I am sure these documents will be of great public interest, so one option would be to upload them onto the Planning Department's case information pages for the two related case numbers, under the "initial submittal" tabs. And/or they could be linked to the Planning web pages for the proposed ordinance.

Yours,

Michael Salman

On 8/26/2022 3:26 PM, Michael Salman wrote:

Dear Ms. Torres or other staff receiving this email

The Case Information system page for the proposed oil ordinance, CPC-4864-CA, lists ENV-2022-4865-EAF as a related case. No "initial submittal documents" are posted under either case number.

Would you please send me a copy of whatever documents exist in the file for ENV-2022-4865-EAF and whatever environmental clearance related documents exist in the file for the underlying case (CPC-4864-CA)?

If there is delay in sending the documents, would you please at least tell if ENV-2022-4865-EAF is only an Environmental Assessment Form at present, or has there been an Initial Study, or something less or something more?

If there are no environmental documents (not even an EAF?), then please let me know.

Thank you,

Michael Salman



Jennifer Torres <jenny.torres@lacity.org>

Re: City of Los Angeles Ban Oil Drill

2 messages

'Susan Cate' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:01 PM

Reply-To: Susan Cate <scfd79@verizon.net>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "Councilmember.buscaino@lacity.org" <Councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

Hi Jennifer,

Case#CPC-2022-4864-CA

My name is Susan Ann Cate and have been receiving Oil Royalty income and have been notified that it is about to end because it has been brought to my attention that you Los Angeles wants to stop oil drilling.

This is not just about the Royalty income this is about us being in a big mess with cars we cannot drive and rely on other countries for gas and pay more money.

I don't understand why you want to do this and it is very stupid it will hit the american public very bad. There are more gas cars than electric cars and where are we suppose get the gas for all our cars????

Not all of us have the money to buy a electric car and another thing to think about the electric company doesn't even have enough electricity to handle now and especially on hot days with air conditioners they are always doing rolling blackouts because they don't have enough electricity. What are they going to handle the extra electricity if we have to charge our cars.

Please don't stop the oil drilling it will be a huge mistake.

Thank you,
Susan Ann Cate

Jennifer Torres <jenny.torres@lacity.org>

Tue, Aug 30, 2022 at 4:16 PM

To: Susan Cate <scfd79@verizon.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

re: CPC-2022-4864-CA

2 messages

John Payne <jpayne48@gmail.com>

Mon, Aug 22, 2022 at 5:35 PM

To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, moyor.helpdesk@lacity.org

I have learned of the city's intention to ban oil and gas drilling in LA County. I am opposed to this action. There are some deposits that are tapped into that do not require further drilling to access the oil deposits. Accordingly, residents that count on this royalty income will be deprived of this income without justification. I therefore request that oil and gas drilling ordinance CPC-2022-4864-CA be denied.

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:01 PM

To: John Payne <jpayne48@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Re: Proposed Oil and Gas Drilling Ordinance, CPC 2022-4864-CA

2 messages

Jim and Ann Johnson <jimanninf265@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 4:31 PM

1600 Oakmont Drive, Unit 2

Walnut Creek, CA 94595

August 22, 2022

Ms. Jennifer Tores

Re: Proposed Oil and Gas Drilling Ordinance, CPC 2022-4864-CA

I am the owner of Mineral Rights on property in Wilmington, CA; property that my parents purchased in 1936 and was our family home for almost 50 years. I understand that your organizations are considering cessation of oil and gas production which will result in my loss of royalty income from my property. Please understand that this will result in the reduction of my already limited living income. Through the years I have been losing the "real income" value of the oil production from this property. Loss of my remaining income from this source is unthinkable. I will turn 90 years old in the next six weeks. My retirement income is already steadily shrinking without this loss.

Please do not shutdown this existing oil and gas production. I can understand the need to reduce emissions from new operations, but emissions from these existing, old, very heavy crude oil, operations are minimal and are gradually decaying. Frankly, I think the shutdowns you are proposing to make will have minimal impact on emissions but will primarily serve to allow you to wave "grand-standing headlines" in the print media with claims of all of the outstanding things you have done and accomplished (much ado over nothing).

Basically, all you are really accomplishing is the reduction of income received by many small royalty owners; people who can little afford this loss of income in today's economic world.

Please vote against stopping the current production of oil and gas in Los Angeles County required by this "grand-standing" Ordinance.

Thank you,

James C. Johnson

jimannnet265@gmail.com

Oils Email <planning.oildrilling@lacity.org>
To: Jim and Ann Johnson <jimanninf265@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:18 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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9/12/22, 4:33 PM

City of Los Angeles Mail - Re: Proposed Oil and Gas Drilling Ordinance, CPC 2022-4864-CA

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

skiprosecfam@sbcglobal.net <skiprosecfam@sbcglobal.net>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Tue, Aug 23, 2022 at 9:43 PM

Dear Jennifer Torres,
Department of City Planning

I have attached a letter stating my concerns for the restrictions against drilling in Los Angeles. We strongly oppose the opposition against drilling. We firmly believe it is an asset to us and our neighbors. Warren Resources has followed responsible business practices. This new mandate is another way for the big enterprises to take over and control our assets.

Put an end to CPC-2022-4864-CA

Sincerely,
Robert Hollomon

 **Letter.pdf**
26K

Oils Email <planning.oildrilling@lacity.org>
To: "skiprosecfam@sbcglobal.net" <skiprosecfam@sbcglobal.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 6:10 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

Robert Hollomon

25107 Doria Avenue
Lomita, CA 90717
skiprosefam@sbcglobal.net

23 August 2022

Jennifer Torres, Department of City Planning

200 North Spring Street, Room 701
Los Angeles, CA 90012
Re: CPC-2022-4864-CA

Dear Jennifer Torres,

I am writing to inform you that I do not agree with the ordinance CPC-2022-4864-CA. This ordinance is against drilling oil in Los Angeles. We hold oil interests and rights that we've had for years. Suddenly, for environmental reasons they are being disputed. My family, friends and I are strongly against Los Angeles County taking these unnecessary actions against oil drilling restrictions.

Warren Resources has represented us and they are committed to doing business lawfully and ethically. They have managed the oil drilling for many years and have been responsible caretakers to our environment.

We have a demand for energy and this ordinance will once again disrupt the natural resources we have at hand and are useful to us and our local neighbors. You're taking away a portion of our rights and livelihood for unknown reasons. We object to this mandate and respectfully ask that you put an end to this mandate moving forward.

Sincerely,

Robert Hollomon



Jennifer Torres <jenny.torres@lacity.org>

Rosa Diaz CPC-2022-4864-CA

3 messages

vicrosa720 via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:34 AM

Reply-To: vicrosa720@yahoo.com

To: councilmember.buscanio@lacity.org

Cc: Planning.oildrilling@lacity.org, Mayor.helpdesk@lacity.org

Hi my name is Rosa Diaz , I am very concerned regarding my royalty income being discontinued , I am widow and 94 living on fixed income. This cut will impact me and I wish something can be done to continue my royalty rights . Thank you Rosa Diaz

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:21 PM

To: councilmember.buscanio@lacity.org

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>

Mon, Aug 29, 2022 at 12:21 PM

To: jenny.torres@lacity.org

**Address not found**

Your message wasn't delivered to **councilmember.buscanio@lacity.org** because the address couldn't be found, or is unable to receive mail.

[LEARN MORE](#)

The response was:

550 5.1.1 The email account that you tried to reach does not exist. Please try double-checking the recipient's email address for typos or unnecessary spaces. Learn more at <https://support.google.com/mail/?p=NoSuchUser> b11-20020a19644b000000b004947619538bsor2857801fj.34 - gsmtip

Final-Recipient: rfc822; councilmember.buscanio@lacity.org

Action: failed

Status: 5.1.1

Diagnostic-Code: smtp; 550-5.1.1 The email account that you tried to reach does not exist. Please try

550-5.1.1 double-checking the recipient's email address for typos or

550-5.1.1 unnecessary spaces. Learn more at

550 5.1.1 <https://support.google.com/mail/?p=NoSuchUser> b11-20020a19644b000000b004947619538bsor2857801fj.34 - gsmtip

Last-Attempt-Date: Mon, 29 Aug 2022 12:21:27 -0700 (PDT)

----- Forwarded message -----

From: Oils Email <planning.oildrilling@lacity.org>

To: councilmember.buscanio@lacity.org

Cc:

Bcc:

Date: Mon, 29 Aug 2022 12:21:15 -0700

Subject: Re: Rosa Diaz CPC-2022-4864-CA

----- Message truncated -----



Jennifer Torres <jenny.torres@lacity.org>

SB 1137

2 messages

Samuel Butler <samjbutler@sbcglobal.net>
Reply-To: Samuel Butler <samjbutler@sbcglobal.net>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 12:36 PM

I am calling on the City of Los Angeles to support SB 1137 to protect our communities from fossil fuel drillers.

Science has shown that a 3,200 foot setback distance between oil and gas drilling and our homes, schools, hospitals, daycare facilities, and prisons is the bare minimum needed to protect people from the worst health outcomes of living near constant oil and gas pollution: asthma, cancers, high-risk pregnancies, and an increased risk for a serious case of COVID-19.

SB 1137 would meet the urgency of the climate emergency by halting new oil and gas extraction within 3,200 feet of sensitive receptors, prohibiting operators from obtaining rework permits on existing extraction sites in the setback zone, and applying engineering and pollution controls to current operations that endanger our communities.

Sincerely,

Sam Butler
Los Angeles, CA

Oils Email <planning.oildrilling@lacity.org>
To: Samuel Butler <samjbutler@sbcglobal.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:24 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Spectrum News 1

4 messages

Kostopoulou, Ioanna <Ioanna.Kostopoulou@charter.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>
Cc: "Minderhout, Cory C" <Cory.Minderhout@charter.com>

Mon, Aug 29, 2022 at 11:58 AM

Hello,

I am with Spectrum News 1 and we are interested in obtaining additional information/ fact sheet(s) for tomorrow's Oil and Gas Drilling Ordinance hearing.

Thank you!

Best Regards,

Ioanna Kostopoulou

Planning Mgr - North Region

Spectrum News 1

ioanna.kostopoulou@charter.com

The logo for Spectrum News, with the word "SPECTRUM" in a smaller, blue, sans-serif font above the word "NEWS" in a larger, bold, blue, sans-serif font.

The contents of this e-mail message and any attachments are intended solely for the addressee(s) and may contain confidential and/or legally privileged information. If you are not the intended recipient of this message or if this message has been addressed to you in error, please immediately alert the sender by reply e-mail and then delete this message and any attachments. If you are not the intended recipient, you are notified that any use, dissemination, distribution, copying, or storage of this message or any attachment is strictly prohibited.

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:47 PM

To: "Kostopoulou, Ioanna" <Ioanna.Kostopoulou@charter.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for reaching out about the Draft Oil Ordinance Public Hearing. Tomorrow's meeting will begin at 6pm with a presentation, followed by a Q&A session at 6:20pm. The public hearing portion will begin at 6:45pm. Stakeholders are able to comment on the proposed ordinance. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Attached to this email are the [Public Hearing Notice](#) and the [FAQ sheet](#). These forms and more information can also be found on <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

2 attachments



Notice of Public Hearing - August 30 2022.pdf
3295K



Notice of Public Hearing - August 30 2022.pdf
3295K

Oils Email <planning.oildrilling@lacity.org>
To: "Kostopoulou, Ioanna" <Ioanna.Kostopoulou@charter.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 3:47 PM

Looks like the fact sheet was left out of the last email. It's attached here.

[Quoted text hidden]



Oil Ordinance Fact Sheet - English Version .pdf
1471K

Kostopoulou, Ioanna <Ioanna.Kostopoulou@charter.com>
To: Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:58 AM

Thank you so much for all of the information!

Best Regards,

Ioanna Kostopoulou

Planning Mgr - North Region

Spectrum News 1

Ioanna.kostopoulou@charter.com



From: Oils Email <planning.oildrilling@lacity.org>
Sent: Monday, August 29, 2022 3:48 PM
To: Kostopoulou, Ioanna <Ioanna.Kostopoulou@charter.com>
Subject: [EXTERNAL] Re: Spectrum News 1

CAUTION: The e-mail below is from an external source. Please exercise caution before opening attachments, clicking links, or following guidance.

[Quoted text hidden]

[Quoted text hidden]



Lilian Rubio <lilian.rubio@lacity.org>

STAND-LA Comment Letter on LA City oil well ordinance draft

Eric Romann <eromann@psr-la.org>

Fri, Sep 2, 2022 at 4:18 PM

To: planning.oildrilling@lacity.org

Cc: Maro Kakoussian <mkakoussian@psr-la.org>, Lilian Rubio <lilian.rubio@lacity.org>, edber.macedo@lacity.org

Dear Los Angeles City Planning Department:

Please find attached a comment letter from the STAND-LA Coalition on the draft oil well ordinance. Thank you for your work on this draft and we look forward to further dialogue with you about it.

best regards,

Eric Romann and Maro Kakoussian, STAND-LA Coalition Co-Coordiators



STAND-LA Comment Letter re LA City Oil & Gas Draft Ordinance 9.2.22.pdf

701K



September 2, 2022

City of Los Angeles
Department of City Planning
201 N Figueroa St.
Los Angeles, CA 90012

Sent via electronic mail

RE: Strengthening the Draft Los Angeles City Oil and Gas Drilling Ordinance

To the City of Los Angeles Planning Department,

We are submitting this comment letter to share feedback about the draft Los Angeles City Oil and Gas Drilling Ordinance (“draft Oil and Gas Ordinance”). As a preliminary matter, we would like to commend the City of Los Angeles for releasing this draft Oil and Gas Ordinance and see it as a great first step in ending new oil drilling and phasing out existing oil production. Moreover, we are grateful for the Department of City Planning’s (“DCP”) continuous work to make the City a healthier place for all, particularly for residents most harmed by the pollution associated with oil drilling. We encourage the City to move the draft forward as fast as possible while still maintaining critical public health and strengthened remediation standards to best prioritize the health and safety of communities throughout the phase-out process.

We offer the following feedback and recommendations to strengthen and promptly adopt a final ordinance:

- First, we strongly support the core of the draft Oil and Gas Ordinance declaring all oil wells a non-conforming land use.
- Second, we ask that the City maintain public health standards in the draft Oil and Gas Ordinance, and properly monitor frontline communities over the phase-out period.

- Third, we strongly recommend the ordinance address the growing need for robust clean-up and remediation measures to ensure that oil drilling sites are not only shut down but also properly cleaned and remediated to a standard that is safe for community-driven redevelopment and use.
- Fourth, we would like to underscore the critical importance of prohibiting acid treatment work during the phase-out period.
- Finally, we request the City clearly explain the process it will undertake to shorten the 20-year default amortization period following its amortization study.

The following responses and recommendations will help ensure that the draft Oil and Gas Ordinance protects community health and safety and results in a thorough clean up of toxic oil drilling operations.

1. We Strongly Support a Final Oil and Gas Ordinance that Declares Oil Wells in All Zones a Nonconforming Use.

We would like to emphasize the critical importance of ensuring that the final Oil and Gas Ordinance covers all oil wells in all zones, including both idle and active wells, as set forth in the current draft Oil and Gas Ordinance. As currently proposed, the draft Oil and Gas Ordinance makes existing oil and gas extraction activities a nonconforming use in all zones. Upon Los Angeles City Council adoption and Mayoral signature, the ordinance would ban new oil and gas drilling and put an end to existing operations after a 20-year amortization period, subject to shortening based on the results of the City's pending amortization studies. We applaud this clear commitment to equally prioritize the health and safety of all LA City residents. Maintaining the draft Oil and Gas Ordinance's plan to cover all wells in all zones is vital to the success of the final Oil and Gas Ordinance and its ability to improve the quality of life for all Angelenos, regardless of zip code.

2. The Draft Oil and Gas Ordinance Should Maintain Key Health and Safety Standards.

Given that the City's default discontinuation period for non-conforming land uses is currently set to twenty years, it is essential that the Los Angeles Municipal Code maintains standards to protect public health over the phase-out period. Adequate health protections in frontline communities are essential and must remain in place until drilling operations are completely phased out and drill sites are remediated.

The proposed draft Oil and Gas Ordinance eliminates a majority of the health and safety standards currently embedded in Los Angeles Municipal Code Section 13.01. To ensure that communities do not risk increased exposure during the phase-out period, we urge the City to retain protective standards relating to the following:

1. The Zoning Administrator's authority to require operators to take corrective action or require cessation of operations regarding the subsidence in the elevation of the ground¹ and to impose additional conditions necessary to afford greater protection to surrounding property.²
2. Los Angeles Department of Water and Power's authority to require changes and inspect methods used in the drilling and producing operations and in the disposal of waste.³
3. Requirements for fencing and landscaping.⁴
4. Requirements that the transport of produced oil and pumping units remain underground.⁵
5. Adherence to the timing requirements for the removal of derricks,⁶ drilling equipment,⁷ installations and facilities.⁸
6. Abandonment requirements that "the well shall be abandoned and the premises restored to its original condition, as nearly as practicable as can be done."⁹
7. Limitations on the hours materials, tools or pipes can be delivered to a drilling site.¹⁰
8. Prohibition of refining processes at drilling sites.¹¹
9. Requirements that operators implement and utilize the following procedures and equipment:
 - a. That "no noise, vibration, dust, odor or other harmful or annoying substances or effect shall ever be permitted to result from production operations carried on at any drilling site or from anything incident thereto to the injury or annoyance of persons living in the vicinity."¹²
 - b. Wells which are placed upon the pump shall be pumped by electricity with the most modern and latest type of pumping units and shall be as free from noise as possible with modern oil operations.¹³
 - c. If an internal combustion engine is used, mufflers be installed on the mud pumps and engine so as to reduce noise to a minimum.¹⁴

To ensure that communities do not risk increased exposure during the phase-out period, we urge the City to retain Los Angeles Municipal Code Sections 13.01 H and Section 13.01 I. We interpret these sections as providing the basis for DCP and the Zoning Administrator's authority to permit drilling operations and prescribe mandatory conditions on operators. Although there is no safe way to drill for oil in neighborhoods, we ask the City to maintain baseline safeguards at oil facilities before oil production is phased out and all drill sites are properly cleaned and remediated.

¹ Los Angeles Municipal Code § 13.01(E)(2)(h), (i).

² §13.01(E)(2)(i).

³ §13.01(F)(38).

⁴ §13.01(E)(2)(f), (g), §13.01(F)(48), (5), (22).

⁵ §13.01(F)(1), (2), (54).

⁶ §§ 13.01(F)(4), 13.01(E)(3)(f).

⁷ §13.01(F)(20), (51).

⁸ §13.01(F)(62).

⁹ §13.01(F)(33). Note that we urge the City to also require revegetation "to as near a natural state as practicable," as noted in Section 3 below.

¹⁰ §13.01(F)(7),(49)

¹¹ §13.01(F)(9),(57)

¹² §13.01(F)(18).

¹³ §13.01(F)(19).

¹⁴ §13.01(F)(34), (44).

3. LA City Must Strengthen Requirements for Robust and Swift Remediation at Oil Drilling Sites.

Third, to truly address environmental justice concerns, the City must ensure that it does not inadvertently leave behind a legacy of contamination in frontline communities as oil drilling activities are phased out. Therefore, while our coalition applauds the City's efforts to strengthen clean-up and remediation requirements at drill sites throughout LA City through a supplemental policy, we believe these remediation requirements should be included in the final Oil and Gas Ordinance. The final Ordinance should include standards and a timeframe appropriate to each drill site's size and operations but no longer than five years for proper abandonment, plugging, clean-up, and remediation of oil and gas wells throughout the City, to ensure that the creation and implementation of remediation and clean-up policies are not delayed. This would encourage operators to initiate plugging/remediation simultaneously with phase-out activities.

It is within the City's authority to craft such standards, and the City can look to other jurisdictions that have done so. For example, Culver City's final oil drilling phase-out ordinance specifies restoration activities and includes language requiring revegetation "to as near a natural state as practicable."¹⁵ It is important to note that Culver City's remediation standard previously required "substantially" returning the site to its "original condition," and Culver City exercised its authority to strengthen this remediation standard in the final Culver City Oil Well Ordinance. Santa Barbara's code specifies that after oil cellars are removed, "soil below the cellars shall be tested for hydrocarbon contamination. If contamination is found to be present the area shall be remediated."¹⁶ Similarly, when equipment, buildings, sumps, pits, and other areas are removed, an "investigation shall be conducted to determine if soil contamination is present. If soil contamination is found, the area will be remediated per the approved plan."¹⁷ Other jurisdictions have provisions for revegetation and regrading.¹⁸

Here, the draft Oil and Gas Ordinance does not require rigorous site restoration, and does not specify that the site should be tested for contamination, revegetated, or regraded.¹⁹ Our coalition urges LA City to specify, at minimum, that operators must test for soil contamination and remediate the drill site if any contamination is detected. We also urge the City to require operators to revegetate drill sites and leave the site uniformly graded and returned to as near a natural state as practicable.

¹⁵ Culver City Zoning Code Amendment P2021-0036-ZCA, amending § 17.610.010(D)(1)(d), <https://culver-city.legistar.com/View.ashx?M=F&ID=9901991&GUID=FCD7CE85-332C-443F-A2AE-9A2200FED44B>.

¹⁶ Santa Barbara County Petroleum Code § 25-31(a)(7), https://library.municode.com/ca/santa_barbara_county/codes/code_of_ordinances?nodeId=CH25PECO.

¹⁷ *Id.* § 25-31(b)(2)(c)(i).

¹⁸ See Culver City Zoning Code Amendment (describing revegetation to as near a natural state as practicable); Bakersfield § 15.66.040(A)(19) (well site restoration includes regrading "as nearly as practicable to a uniform grade" within a specified time); Santa Barbara County § 25-31(a)(7) (all excavations and depressions must be filled with clean soil).

¹⁹ Draft Oil Well Ordinance (May 5, 2022) at 20.

Finally, we urge the City's oil well clean up program to encourage operators to initiate plugging/remediation simultaneously with phase-out activities.

4. LA City Must Prohibit Harmful Well Maintenance Including Acid Treatments.

Fourth, we support an immediate prohibition on maintenance activities that enable further production and threaten public health and safety, including a prohibition on all forms of acidizing (acid maintenance / acid washing, matrix acidizing, and acid fracturing).

If there is any question as to whether acidizing is prohibited under the proposed ordinance, we urge the City to provide that clarification and specifically list acid treatment as among the maintenance activities that will be prohibited once the ordinance goes into effect. Our understanding is that the City intends in section 12.23.C.4(a) to prohibit maintenance except for in the narrow circumstances outlined in proposed section 13.01.K "Maintenance of Drilling and Production Sites" to protect public health and safety. Proposed section 12.23.C.4(a) states "... No existing well for the production of oil, gas or other hydrocarbon substances, which is a nonconforming use, shall be ***maintained***, drilled, re-drilled, or deepened." Therefore, although the ordinance does not list acid treatment as a type of maintenance activity, it will nonetheless prohibit it, as clarified in the corresponding Fact Sheet: "Well servicing activities such as replacement of tanks, appurtenant structures, and equipment would not be affected by this ordinance. ***Maintenance activities such as, but not limited to, acid treatment***, reworking, and sidetracking would not be permitted once this ordinance becomes effective."²⁰

It is critical to prohibit all forms of acidizing, including acid maintenance, because all acid work is done to extend the life of oil wells and enable additional production. The American Petroleum Institute has explained that acidizing is "performed on new wells to maximize their initial productivity and on aging wells to restore productivity and maximize the recovery of the energy resources."²¹

It is also important to prohibit all forms of acidizing because acidizing is not sufficiently regulated and poses an ongoing threat to nearby communities. "In California . . . large quantities of acid and high concentrations are being used in all types of acidizing events."²² Tanker trucks currently arrive unannounced near frontline communities, loaded with thousands of gallons of acid, while workers covered head-to-toe in protective equipment operate equipment.²³ STAND-LA member organizations have documented chemical burns on plants downwind of drill sites due to acidic fumes. Although there are CalGEM permitting regulations that apply to well stimulation activities, including acid fracturing

²⁰ Los Angeles City Planning, *Oil and Gas Drilling Ordinance Fact Sheet* at 2, https://planning.lacity.org/odocument/7e8aea68-fb21-4920-b0a1-0a1dc0f6563a/Oil_Ordinance_Fact_Sheet_-_English_Version_.pdf.

²¹ American Petroleum Institute, *Acidizing Treatment in Oil and Gas Operations*, Acid <https://www.api.org/-/media/Files/Oil-and-Natural-Gas/Hydraulic-Fracturing/Acidizing-oil-natural-gas-briefing-paper-v2.pdf>.

²² Stringfellow et al, *Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development*, PLoS ONE (2017) at 6.

²³ John Schreiber, *Residents allege oil site brought acid, toxic chemicals to South L.A. neighborhood* (Apr. 23, 2015), <https://mynews1a.com/life/2015/04/23/residents-allege-oil-sitebrought-acid-toxic-chemicals-to-south-l-a-neighborhood/>.

activities, the regulations do not cover acid maintenance or all matrix acidizing.²⁴ As explained by one Southern California research team that compared the number of matrix acidizing events in CalGEM and South Coast Air Quality Management District (SCAQMD) databases through mid-2015, hundreds of “matrix acidizing events did not show up in [CalGEM’s] database, though based upon legal jurisdiction they should have,” likely due to the narrow definition of acid stimulation in the regulations.²⁵ CalGEM does not even require public notification prior to acidizing. SCAQMD Rule 1148.2 is supposed to require mandatory disclosure of on-field chemical-use for acidizing. However, disclosure alone cannot protect communities and the rule has been plagued by implementation issues, including:

- a. Operators can send notice that activities will occur within 72-hours but then extend the notice up to 5 times leaving residents without same-day certainty for when toxic work will take place;
- b. The rule depends on self-reporting;
- c. Local notification is missing – emails are sent for work throughout the entire SCAQMD area;
- d. SCAQMD has not enforced against operators that misreport or fail to report;
- e. There is no mechanism to oppose activities;
- f. The rule does not cover injection wells, which use the same chemicals;
- g. Sometimes information is withheld because of trade secrets;
- h. Operators have skirted Rule 1148.2 reporting on production wells by doing smaller acid treatments more frequently. These smaller tanker trucks make multiple weekly visits to drill sites to inject wells. As SCAQMD moves to apply Rule 1148.2 to all wells, the industry may apply this strategy to injection wells. Therefore, it is essential that the City define prohibited acid maintenance work broadly to encompass these smaller, more frequent maintenance activities that are not captured by Rule 1148.2.

The City must take action now to protect communities from ongoing exposure during acid jobs.

5. LA City Should Explain the Process of Amending the 20-Year Default Amortization Period Following Completion of the Amortization Study.

Finally, it is our hope and expectation that upon completion of the pending amortization study described in the January 26, 2022 Los Angeles City Council motion, the City will amend and shorten the 20-year default amortization period in accordance with the results of the study. In order to ensure that oil drilling phase-out proceeds as expeditiously as possible, we ask the City to direct DCP to detail the process to shorten the default amortization schedule based on the results of the pending LA City amortization study in a future staff or other report. Describing this process would increase public transparency and allow community members to better understand how the City intends to implement the final Oil and Gas Ordinance.

Thank you for your consideration of these comments. We appreciate LA City’s bold leadership in establishing a process to phase-out oil drilling and we look forward to continued collaboration.

²⁴ 14 Cal. Code Regs. § 1761.

²⁵ Abdullah et al, *Toxicity of acidization fluids used in California oil exploration*, Tox. & Enviro. Chem. (2016) at 7.

Sincerely,

Martha Dina Arguello
Executive Director, Physicians for Social Responsibility-Los Angeles
Co-chair of STAND-LA Coalition

Bahram Fazeli, Director of Policy and Research, Communities for a Better Environment
Co-chair of STAND-LA Coalition

Gloria Medina
Executive Director, SCOPE

Reverend Louis Chase
Minister of Community Engagement, Holman United Methodist Church

Nancy Halpern Ibrahim
Executive Director, Esperanza Community Housing

Tianna Shaw-Wakeman
Environmental Justice Program Coordinator, Black Women for Wellness

Eric Romann
Co-Coordinator, STAND-LA Coalition

Maro Kakoussian
Co-Coordinator, STAND-LA Coalition

Alison Hahm
Staff Attorney, Communities for a Better Environment

Liz Jones
Staff Attorney, Climate Law Institute, Center for Biological Diversity

Paulina Torres
Staff Attorney, Natural Resources Defense Council

CC:
Office of Mayor Eric Garcetti
Office of Los Angeles City Attorney Mike Feuer
Los Angeles City Council



Jennifer Torres <jenny.torres@lacity.org>

Stop All LA Oil Drilling Now

2 messages

Daniel Buerge <daniel.buerge@gmail.com>
To: planning.oildrilling@lacity.org

Mon, Aug 15, 2022 at 5:17 PM

I am a local LA resident who lives nearby the Inglewood Oil Fields.

I was very encouraged to hear of the proposed ordinance to ban oil drilling in Los Angeles.

I hope that it will also lead to closing wells currently in use & would be thrilled to see the Inglewood Oil Fields closed down completely.

--

Jennifer Torres <jennifer.a.torres@lacity.org>
To: Planning Oil Drilling <planning.oildrilling@lacity.org>
Cc: Daniel Buerge <daniel.buerge@gmail.com>

Tue, Aug 16, 2022 at 3:56 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop oil drilling in LA

2 messages

'REED FENTON' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 10:36 AM

Reply-To: REED FENTON <reefen@aol.com>

To: planning.oildrilling@lacity.org

Please!

Sent from my iPhone

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:20 PM

To: REED FENTON <reefen@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

2 messages

Hector Martinez Lozada <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 11:02 PM

Reply-To: Dmartin3z7911@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Hector Martinez Lozada

Oils Email <planning.oildrilling@lacity.org>

Sat, Aug 27, 2022 at 2:05 PM

To: Dmartin3z7911@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will

be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

2 messages

yvonedipre38@gmail.com <yvonedipre38@gmail.com>

Fri, Aug 26, 2022 at 1:16 PM

Reply-To: yvonedipre38@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Yvonne Dipre

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:38 PM

To: yvonedipre38@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA2 messages

Troy Barry <mailagent@thesoftedge.com>

Fri, Aug 26, 2022 at 2:36 PM

Reply-To: tsbarry@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Troy Barry

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:39 PM

To: tsbarry@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

UNNC's Comment Letter regarding the Oil Drilling proposal, CPC-2022-4864-CA

2 messages

'Laura Meyers' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 1:59 PM

Reply-To: Laura Meyers <lauramink@aol.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: "srpeckman@gmail.com" <srpeckman@gmail.com>, "ccarlson@carlsonpohl.com" <ccarlson@carlsonpohl.com>, "president@unnc.org" <president@unnc.org>, "gdjackson@ymail.com" <gdjackson@ymail.com>

The United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council (UNNC) voted to approve and submit the attached comment letter regarding the proposed ordinance changes regarding oil drilling citywide.

Thank you very much,

Laura Meyers
Co-Chair, UNNC Planning & Zoning Committee

Steve Peckman
Co-Chair, UNNC Oil Drilling Subcommittee

Chris Carlson
Co-Chair, UNNC Oil Drilling Subcommittee

**UNNC_Letter RE Oil Drilling Ordinance_CPC-2022-4864-CA.pdf**
128K

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:12 PM

To: Laura Meyers <lauramink@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



UNITED
NEIGHBORHOODS
NEIGHBORHOOD
COUNCIL

September 2, 2022

Jennifer Torres
Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
planning.oildrilling@lacity.org

RE: Case No. CPC-2022-4864-CA, Council File No. 17-0447 -- Proposed Oil Drilling Ban (Ordinance)

Dear Ms. Torres:

The United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Communities Neighborhood Council (UNNC) supports in concept the draft ordinance that would prohibit new oil and gas extraction and make all extraction activities a non-conforming use. We agree with the Planning Department that the closure of drill sites is critical to the health and welfare of our community and an important component of any plan to address the worsening effects of global warming.

Yet, the important goal of closing drill sites should not require **eliminating from the Code all current and necessary safety and environmental protections and potential remedies that serve to protect our community and provide a proven and successful path to redress grievances**, This significant issue and a number of others must be satisfactorily addressed prior to endorsing the revised ordinance.

For decades, the UNNC has dealt with the negative impacts of oil and gas drill sites directly adjacent to residential and sensitive uses in our community. With the support of then-City Council President Herb Wesson and using the pathways available to us through the quasi-judicial process of the Zoning Administrator (ZA), we stopped the addition of a gas flare that would burn 400,000 cubic feet of gas per day in the middle of a residential neighborhood. We also successfully campaigned for the closure of another site directly adjacent to an elementary school and residences.

United Neighborhoods Neighborhood Council
P.O. Box 19219, Los Angeles, CA 90019
president@unnc.org

(323) 731-8686

www.UNNC.org

In addition to the draft ordinance **removing from the Code all current and necessary safety and environmental protections and potential remedies that serve to protect our community and provide a proven and successful path to redress grievances**, other concerns include: (2) the draft ordinance eliminates the Zoning Administrator's (ZA) responsibilities regarding the closure and remediation of the oil sites now and in the future, and (3) the absence of detail about the crucial amortization study.

1. **The draft ordinance removes all current safety and environmental protections from the Code that serve to protect our community, including the authority of the ZA to address current or future issues at drill sites. The revised Code also removes a proven and successful pathway for the community to seek remedies to problems at the drill sites. Additionally, the revised Code may void many of the current standing ZA determinations and requirements that refer to the existing Code.** The removal of these protections begs a question regarding the level of involvement of the City Attorney in the draft ordinance. For example, the draft indicates:

*“Section 11. Subsection F of Section 13.01 of the LAMC is **deleted in its entirety**”* (emphasis added).

Section 13.01(F) provides the ZA with authority to, *“impose other conditions in each district as deemed necessary and proper”* to ensure the health and well-being of our community. For example, sections of 13.01(F) removed from the ordinance include but are not limited to the following:

13.01(F)(2): *That all oil produced in said district shall be carried away by pipe lines or, if stored in said district, shall be stored in underground tanks so constructed that no portion thereof will be above the surface of the ground.*

Removal of this section of the Code will result in requiring the transportation of oil by truck which will be potentially more harmful to our community than the current required pipeline.

13.01(F)(4): *That the operators shall remove the derrick from each well within thirty (30) days after the drilling of said well has been completed, and thereafter, when necessary, such completed wells shall be serviced by portable derricks.*

Removal of this section of the Code could result in delays in capping and remediating wells that are no longer in use and potentially creating a larger financial liability for the City in years to come as drill sites are abandoned (see #2 below).

13.01(F)(18): *That all production equipment used shall be so constructed and operated that no noise, vibration, dust, odor or other harmful or annoying substances or effect which can be eliminated or diminished by the use of greater care shall ever be August 2022 Page 14 of 23 DRAFT CPC-2022-4648-CA CF 17-0447 permitted to result from production operations carried on at any drilling site or from anything incident thereto to the injury or annoyance of persons living in the vicinity; nor shall the site or structures thereon be permitted to become dilapidated, unsightly or unsafe. Proven technological improvements in methods of production shall be adopted as they, from time to time, become available if capable of reducing factors of nuisance or annoyance.*

United Neighborhoods Neighborhood Council

P.O. Box 19219, Los Angeles, CA 90019

(323) 731-8686

president@unnc.org

www.UNNC.org

Since oil and gas operations, under the current proposal, will continue for 20 years, NOT including closure and remediation of toxic drill sites, the UNNC requests that you restore all sections of the Code that provide a path for our community to engage the quasi-judicial process embodied through ZA authority. Removal of this section of the Code appears to eliminate all protections against noise, vibration, dust, odor or other harmful or annoying substances during the period between approval of the draft ordinance and closing of a site in 20 years.

- 2. Closure and remediation of the drill sites.** The revised ordinance also does not include any policies or procedures for addressing abandonment of the site. In fact, it removes the existing ZA authority 13.01(F)(33) to ensure adequate and appropriate procedures for decommissioning a site. The ordinance must include a process for ensuring that the operator safely and completely plugs the wells and remediates the site prior to closing the case. Without such a policy in place, operators will abandon the drill sites and leave the expensive clean-up, plugging, and remediation to the City; the costs of which will be borne by taxpayers. In the end, operators will have reaped the financial profits from using the site and leave the very expensive costs of closing the site to us thus potentially delaying the clean-up well beyond the 20 year horizon contemplated in the draft ordinance. The City should consider and implement closing strategies that incentivize:
- a. Early closure and remediation of unused wells. This will ensure that the process of capping and remediation begins as soon as possible and before the 20-year horizon. Such a strategy will also ensure at least some wells are addressed even if an operator later abandons the site or declares bankruptcy.
 - b. A funding strategy whereby operators pay into an interest-bearing bond or account on a pre-determined timeline to build a capping and site remediation budget as a hedge against abandonment or bankruptcy.

The Planning Department's powerpoint presentation during a Plan Check meeting on August 13, 2022 indicates *"Abandonment and the Remediation process [is] not a part of this ordinance. Other local and state enforcement agencies are responsible for overseeing these activities."* Yet, the draft ordinance at 13.01(F)(33) proposes to remove the authority of the ZA or Area Planning Commission to ensure that procedures for abandonment follow the *"required law and the premises restored to their original condition as nearly as practicable as can be done. If a producing well is not secured within eight months, the well shall be abandoned and the premises restored to its original condition, as nearly as practicable as can be done."* The existing Code does NOT duplicate authority or responsibilities with other agencies but rather ensures conditions of approval and operations are subject to ZA review and there is a pathway for the community to request such a review.

The Petroleum Administrator is charged with coordinating the various agencies responsible for the protection of our community and the environment. Rather than remove the ZA from the process, the Petroleum Administrator and ZA should be collaborating in protecting the long term safety of the community by ensuring the prompt, safe, and effective decommissioning of the drill sites.

United Neighborhoods Neighborhood Council

P.O. Box 19219, Los Angeles, CA 90019

(323) 731-8686

president@unnc.org

www.UNNC.org

3. **Amortization Study:** The City plans to conduct an amortization study. Approving the draft ordinance prior to the amortization study puts the cart before the horse. The study may very well identify other aspects of the draft that need clarification, expansion, or omission. Our concern is underscored by the Planning Department's acknowledgement of this point in a Powerpoint presentation during an August 13, 2022 Plan Check meeting that the study holds the "*Possibility for future code amendments depending on the amortization study results.*"

It is also unclear why the study will take so long while the process for approving the draft Ordinance is so rushed (Aug 9 release, Aug. 30 hearing, fall Planning Commission). The proposed modifications will impact our communities and may make things worse. We, therefore, request that the proposed amortization study, including a period for public comment, be completed prior to introducing the revised Code, as the study may impact proposed modifications of the Code.

The City Planning Department plays an important role in the complex City and State regulatory framework governing oil and gas resources. While the UNNC supports the concept to close drill sites in the City, the UNNC Governing Board is not able to endorse the changes in the ordinance as those changes reduce or eliminate **necessary safety and environmental protections.**

For decades, the protections provided by the quasi-judicial ZA process provided in the Code have been a critical part of the toolbox available to the community in achieving **remedies that serve to protect our community and provide a proven and successful path to redress grievances as well as the successful closure of drill sites.** The City is proposing an unnecessary trade-off; that is, elimination of the current successful regulatory framework that protects our community in order to close drill sites in the future.

Instead, the City should support both the continuation and retention of the Planning Department and ZA's significant role in oversight of oil/gas drilling during the interim period of operations as well as the remediation and complete closure of drill sites. To do otherwise is to abdicate the Planning Department's historic and successful responsibility for ensuring our safety.

Due to the rushed public outreach so far, UNNC also requests that the public comment period be extended and if needed, the CPC hearing deferred, to allow for broader public comment.

Sincerely,

Laura Meyers
Co-Chair, UNNC Planning & Zoning Committee
laura.meyers@unnc.org

Steve Peckman
Co-Chair, UNNC Oil Drilling Subcommittee
srpeckman@gmail.com

Chris Carlson
Co-Chair, UNNC Oil Drilling Subcommittee
chris.carlson@unnc.org

CC: Greg Jackson, president@unnc.org

United Neighborhoods Neighborhood Council

P.O. Box 19219, Los Angeles, CA 90019

(323) 731-8686

president@unnc.org

www.UNNC.org



Jennifer Torres <jenny.torres@lacity.org>

Virtual Presentation and Public Hearing

2 messages

'Rachel Flores' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 4:15 PM

Reply-To: Rachel Flores <ravin6366@yahoo.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

August 25, 2022

Subject: City of Los Angeles to Ban Oil and Gas Drilling**Case Number:** CPC-2022-4864-CA

To Jennifer Torres, Department of City Planning:

Regarding the proposed ban on oil and gas drilling, I want to share my opposition to this action. First, this action will be detrimental to thousands perhaps tens of thousands of people that will be left without employment in both the Oil and Automotive industries. The result can be devastating to our economy. Secondly, this decision will eliminate a source of income, that while not an exorbitant amount, it does help me and my family.

In conclusion, I would ask that you reconsider passing this proposal given the significant negative impact this will have on many families and individuals. I thank you for your attention to this matter.

Sincerely,

Rachel Flores

[Sent from Yahoo Mail on Android](#)

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:53 PM

To: Rachel Flores <ravin6366@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

9/12/22, 4:38 PM

City of Los Angeles Mail - Virtual Presentation and Public Hearing

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Warren Resources -Oil and Gas Drilling

2 messages

Marina Grignetti <marinahana7@gmail.com>
To: planning.oildrilling@lacity.org

Thu, Aug 25, 2022 at 9:19 PM

Please read attached letter supporting Warren Resources - Oil and Gas Drilling

Thank you.

Marina Grignetti

 **Warren Resources Letter.docx**
14K

Oils Email <planning.oildrilling@lacity.org>
To: Marina Grignetti <marinahana7@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 5:04 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Warren Resources proposed ending of operations in2 messages

Jean Von Wittenburg <jvon1@cox.net>

Tue, Aug 23, 2022 at 10:27 AM

To: "Planning.oil drilling@lacity.org" <Planning.oildrilling@lacity.org>

Cc: ownerrelations@warrenresources.com

To Whom it May Concern:

Attn: Jennifer Torres

I just received the notice of the planned end of my royalty income and am very disturbed, having been a recipient for over 80 years! Warren has always been one of the most faithful and efficient companies and it is certainly a sad ending to a wonderful income source. Hope to hear from you.

My contact information is:

Jean Ellen von Wittenburg

Casa Dorinda

300 Hot Springs Rd. #L228

Santa Barbara, California 93108.

Thank you.

Jean vW

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 3:26 PM

To: Jean Von Wittenburg <jvon1@cox.net>, Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Warren Resources, Case CPC-2022-4864-CA

3 messages

'Elaine Irick' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 4:06 PM

Reply-To: Elaine Irick <emirick@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "ownerrelations@warrenresources.com" <ownerrelations@warrenresources.com>, Elaine Irick <emirick@aol.com>

Jennifer Torres, Dept. of City Planning
200 North Spring St., Room 701
Los Angeles, CA 90012
(213) 978-3094

Re: Warren Resources: Cessation of Production and Royalty Income
Case # CPC-2022-4864-CA

Dear Jennifer Torres:

We would be deeply affected by the Proposal to BAN OIL & GAS DRILLING in the city of Los Angeles. We have received Royalties from this company for many years, and we depend on these funds more than ever now during this difficult recession, with gas and food and everything we need to pay the high cost of living in California.

Also, I hope you will consider the many employees who would lose their jobs, and homes, if this bill passes. The California homeless population is growing every day. I'm sure you realize that there would be significant losses in the State of California Revenue, and our Cities would lose revenue as well.

We ask you to please vote NO on this Bill and save us all further pain, loss of income, and the inflation we already experience.

Your consideration in this matter is much appreciated. Thank you.

Elaine M. Irick
Roy C. Irick, Owner # 05843
1517 Via Arco
Palos Verdes, CA 90274
Email: emirick@aol.com

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 11:52 AM

To: Elaine Irick <emirick@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the

City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

'Elaine Irick' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 6:40 PM

Reply-To: Elaine Irick <emirick@aol.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Dear Planning Lady:

Thank you so much for your response and for recording my thoughts. I appreciate your efforts. Good Luck at the meeting tonight!

Elaine Irick

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Will this mean more offshore drilling?

2 messages

'Melissa Lavabre' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 9, 2022 at 12:17 PM

Reply-To: Melissa Lavabre <melissalavabre@icloud.com>

To: planning.oildrilling@lacity.org

Hello,

My question would be if Los Angeles phases out oil drilling in the city, where will it get its new supply to make up the loss from these operations? Is it going to mean more offshore drilling or drilling in sensitive regions such as Alaska? Or is the city going to be able to reduce its oil consumption so that there is no need to make up for this loss?

Thanks,

Melissa

Jennifer Torres <jenny.torres@lacity.org>

Thu, Sep 1, 2022 at 11:20 AM

To: Melissa Lavabre <melissalavabre@icloud.com>

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.



Jennifer Torres <jenny.torres@lacity.org>

Yay! I strongly support prohibiting oil and gas drilling!

2 messages

'susan collette' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 9, 2022 at 9:20 PM

Reply-To: susan collette <susanhc90025@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Susan Collette

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 15, 2022 at 3:20 PM

To: susan collette <susanhc90025@yahoo.com>

Hello,

Thank you for email and apologies for the delayed response. Your email was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

On Tue, Aug 9, 2022 at 9:20 PM 'susan collette' via Planning Oil Drilling <planning.oildrilling@lacity.org> wrote:

| Susan Collette



Jennifer Torres <jenny.torres@lacity.org>

Re: Proposed Oil and Gas Drilling Ordinance

3 messages

'D. Brakefield' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 9:05 AM

Reply-To: "D. Brakefield" <dabrake@startmail.com>

To: Gabriela Medina <gabriela.medina@lacity.org>

Cc: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org

Thank you for your response to my recent e-mail regarding the proposed oil and gas drilling ordinance. I will make my comments brief and to the point.

Each day we learn of the imminent catastrophic results caused by short sighted energy policies of the United States and their European allies. The world cannot currently function without fossil fuels while the green proponents have attempted, and failed, for decades to formulate alternatives. Try as they may, without energy there cannot be a functioning economy. Yes, energy is being weaponized. And we need to pay close attention.

With that said, Los Angeles is making a mistake by currently considering reducing and ending gas and oil drilling. The energy environment has changed dramatically - and thus, Los Angeles should place their energy policy on immediate hold until the world's energy situation stabilizes.

This should not be seen as a defeat. It is the only choice for responsible governments to make when understanding how their policies will affect citizens.

Time to step back.

Regards,
D. Brakefield

On Wednesday, August 31, 2022 5:31 PM, Gabriela Medina <gabriela.medina@lacity.org> wrote:

Good Afternoon:

Thank you for your email and your inquiry regarding the City of Los Angeles' Proposed Oil and Gas Drilling Ordinance. The Los Angeles City Council asked the City Attorney to draft an ordinance to phase out oil drilling in the City by immediately banning **new** oil and gas extraction and requiring the cessation of all **existing** oil and gas operations within a 20-year period, known as the "amortization period." This means that existing drill sites may continue to operate for up to 20 years after which time all drilling related activities must cease.

The amortization period allows operators to recoup their capital investments in oil drilling activities prior to instituting plans for the decommissioning of existing wells. The Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) is preparing an amortization study. Depending on the results of this study, there may be future changes requiring individual wells to shut down sooner, in instances when the operator may recoup their investments prior to the proposed 20-year amortization period as stipulated under this ordinance. However, any assertion that cessation of existing production and royalty income is "imminent" is not accurate.

On August 9, Los Angeles City Planning (City Planning) released a draft of the proposed Oil and Gas Drilling Ordinance (Oil Ordinance). Yesterday, City Planning held a virtual presentation, question and answer session, and public hearing on the proposed ordinance. If you were unable to attend or have more to share, please be reminded that there is still an opportunity for your comments to be heard.

Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. In order to ensure that your

comments are included in the staff recommendation report to the City Planning Commission, **please submit written comments by email to planning.oildrilling@lacity.org or by hard copy to the mailing address below by September 2, 2022 at 5 p.m. Any written communication must include case number CPC-2022-4864-CA.**

Please visit City Planning's [website](#) to view the proposed [Draft Oil Ordinance](#) and [Fact Sheet](#) containing frequently asked questions. If you have any questions or would like to sign up for updates and/or provide feedback, please email planning.oildrilling@lacity.org or send correspondence to the following mailing address:

Jennifer Torres, Department of City Planning
[200 North Spring Street, Room 701](#)
[Los Angeles, CA, 90012](#)

Thank you for your continued interest and participation in the Oil Ordinance AND **please refer all public comment and inquiries directly to the planning department.**

Best,

Council District 15

--



Gabriela Medina | District Director
 Office of Councilman Joe Buscaino
 City of Los Angeles, District 15
 310-732-4515 | San Pedro Office
 323-568-2083 | Watts Civic Center
 213-473-7015 | City Hall
www.la15th.com
[@JoeBuscaino](#)

Gabriela Medina <gabriela.medina@lacity.org>
 To: "D. Brakefield" <dabrake@startmail.com>
 Cc: councilmember.buscaino@lacity.org, planning.oildrilling@lacity.org

Thu, Sep 1, 2022 at 9:09 AM

Thank you for your response. Please know that written comments to me will not be formally recorded as public comment on the item. If you wish for it to be recorded as public comment, please follow the instructions I outlined in my previous email. Thank you.

[Quoted text hidden]

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Special Notice:

Our office is continuing to operate at a normal staffing level, however, due to the Mayor's Directive on coronavirus (COVID-19), our offices are closed to the public at this time. As part of our efforts to mitigate the spread of this virus please call or email our office instead. Additionally, we are in the process of switching all meetings to either web or telephone conferences. Thank you for your understanding.

[1]
[SEP]

Nuestra oficina seguirá operando normalmente, pero, por la directiva de el Alcalde Eric Garcetti sobre el caso de Coronavirus (COVID-19), nuestras oficinas estarán cerradas para el público sobre las próximas semanas. Para prevenir el riesgo de contraer el virus y hacer todo lo posible en dar la información más reciente sobre lo que la Ciudad de Los Ángeles y el Distrito 15 están haciendo para combatir esta pandemia, por favor de llamar a nuestra oficina o mandarnos un correo electrónico. En nuestro esfuerzo de prevención, solamente tendremos juntas por teléfono o videoconferencia. Muchas gracias por su colaboración y paciencia!

[1]
[SEP]

Immediate life-threatening police, fire or medical emergency: 9-1-1
 Police non-emergency: 877-ASK-LAPD (275-5273)
 Abandoned Vehicles: 1-800-ABANDON (222-6366)

Sanitation (missed trash pick-up, broken container): 800-773-2489

Traffic control (broken traffic signal): (818) 374-4823

Dept. of Water & Power: 800-342-5397

To request outreach services for people experiencing homelessness LA HOP

Other City issues: 3-1-1

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:27 AM

To: "D. Brakefield" <dabrake@startmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CASE NUMBER; CPC-2022-4864-CA

2 messages

Dana Zenor <dzenor@warrenresources.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 11:59 AM

Good afternoon,

This was sent into our corporate office and is being forwarded on to you.

Regards,

Dana Zenor

Warren Resources, Inc.

14131 Midway Rd., Suite 500

Addison, Texas 75001



Pages from Untitled-2.PDF - Adobe Acrobat Pro.pdf
64K

Oils Email <planning.oildrilling@lacity.org>
To: Dana Zenor <dzenor@warrenresources.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 12:24 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

9/12/22, 8:52 PM

City of Los Angeles Mail - CASE NUMBER: CPC-2022-4864-CA

[Quoted text hidden]

C. W. (BILL) BRASHIER

4510 Marloma Drive
Rolling Hills Estates, Ca 90274
310-375-1822.

August 21, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, Ca 90012

CASE: CPC-2022-4864-CA
Cessation of Oil Production

It has recently come to my attention that the /City of Los Angeles is considering a new ordinance eliminating oil production operations within the city limits. Although I might agree that drilling of new wells in a heavily occupied city is not desirable, shutting down existing production seems to be counter productive to the country as a whole. In addition, over a period of time the existing wells will become “uneconomic” and will be abandon.

If you are thinking that this action will reduce global warming, I suggest that it would only transfer emissions from where they can be controlled to where they can not. The “world” is not yet ready to eliminate fossil fuels at this point. Internal combustion engines and fossil fuel fired electric generate plants are going to be with us for some years.

Eliminating local oil production will only increase it elsewhere. Think, Permian Basin in USA or to Russia, Saudi Arabia, Venezuela. Do we want to put ourselves in a situation much like Germany finds its self today, relying on natural gas from Russia? It may be cold winter in Germany.

Think ahead!

C. W. “Bill” Brashier



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

Julie M. Roberts <roberts.juliem@gmail.com>

Tue, Aug 30, 2022 at 3:08 AM

To: Planning.oildrilling@lacity.org, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "mayor.helpdesk@lacity.org" <mayor.helpdesk@lacity.org>

Dear Ms. Torres, Mayor Garcetti and
Councilman Buscaino

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations (since 1937). The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help meet our daily needs during retirement, due to escalating rent, food & pharmaceutical prices to name a few.

We urge you to reject this ordinance and work with our families, and the safety compliant & responsible drilling companies to find a more balanced approach.

Sincerely,

Julie Roberts

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:19 PM

To: "Julie M. Roberts" <roberts.juliem@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Re: CASE NUMBER: CPC-2022-4864-CA

2 messages

'DENNIS DE BRITZ' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Aug 25, 2022 at 11:11 AM

Reply-To: DENNIS DE BRITZ <kegc33@yahoo.com>

To: Fernando Navarrete <fernando.navarrete@lacity.org>

Cc: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

Any curtailing of oil production in the United States is totally counterproductive to being energy independent. Our oil producers & refiners here in the United States operate with the most restrictive environmental measures. Per requirements by the AQMD. By limiting oil producing here in the U.S. and importing more oil from abroad from countries that have no AQMD or environmental restrictions of any kind. We create way more pollution worldwide. Not to mention the added pollution from shipping outside our country.

We are a long way from affording Electric Cars. The raw materials to make batteries are problematic. Like many other batteries, the lithium-ion cells that power most electric vehicles rely on raw materials — like cobalt, lithium, and rare earth elements — that have been linked to grave environmental and human rights concerns. Cobalt has been especially problematic.

We don't need to be creating any more inflation by raising the cost of fuel due to reduced supply. The current administration is currently driving the country into recession.

The, homeless, and Crime is out of control in Los Angeles. Inflation is financially hurting the poor and middle class.

Businesses and people are leaving California for Texas, Tennessee, and states where they are welcomed with incentives and not imposing unnecessary regulations on them.

Why aren't these issues being addressed! We were virtually energy independent 2 years ago with no inflation and a robust economy prior to covid. Why as politicians aren't you addressing the state of the economy and trying to get us back on track!

1st and primary. Why are you opposed to oil production on existing wells. Why shut down these existing wells while importing oil from unfriendly nations who support terrorists that hate us.

DENNIS DEBRITZ

On Wednesday, August 24, 2022 at 05:02:06 PM PDT, Fernando Navarrete <fernando.navarrete@lacity.org> wrote:

Good afternoon,

The Los Angeles City Council has asked the City Attorney to draft an ordinance to phase out oil drilling in the City by immediately banning **new** oil and gas extraction and requiring the cessation of all **existing** oil and gas operations within a 20-year period, known as the "amortization period." This means that existing drill sites may continue to operate for up to 20 years after which time all drilling related activities must cease.

The amortization period allows operators to recoup their capital investments in oil drilling activities prior to instituting plans for the decommissioning of existing wells. The Office of Petroleum and Natural Gas Administration and Safety (OPNGAS) is preparing an amortization study. Depending on the results of this study, there may be future changes requiring individual wells to shut down sooner, in instances when the operator may recoup their investments prior to the proposed 20-year amortization period as stipulated under this ordinance. However, any assertion that cessation of existing production and royalty income is "imminent" is not accurate.

Please see the attached fact sheet for more information.

--

Respectfully,

Fernando Navarrete

Public Works Deputy

Office of Councilman Joe Buscaino

Council District 15

City of Los Angeles

638 S. Beacon St., Suite 552, San Pedro CA, 90731

Office: 310-732-4515 | fernando.navarrete@lacity.org



Special Notice:

Our office is continuing to operate at a normal staffing level, however, due to the Mayor's Directive on coronavirus (COVID-19), our offices are closed to the public at this time. As part of our efforts to mitigate the spread of this virus please call or email our office instead. Additionally, we are in the process of switching all meetings to either web or telephone conferences. Thank you for your understanding.



Oil Ordinance Fact Sheet - English Version .pdf

1471K

Oils Email <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 4:39 PM

To: Fernando Navarrete <fernando.navarrete@lacity.org>, DENNIS DE BRITZ <kegc33@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number CPC-2022-4864-CA

2 messages

'Rgaone' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 8:56 AM

Reply-To: Rgaone <rgaone@aol.com>

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>

I am in favor of a 20 year amortization plan.
Being retired, on a fixed income, we depend on my small stipend for living expenses.

Linda Allebaugh

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:43 AM

To: Rgaone <rgaone@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case # CPC-2022-4864-CA

2 messages

Natalie <funincape1027@comcast.net>

Tue, Aug 30, 2022 at 3:46 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Dear Ms. Torres

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

*Sincerely,**Carl Schmidt*

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:15 PM

To: Natalie <funincape1027@comcast.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the

City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comment Letter - CPC-2022-4864-CA

2 messages

Francisco Romero <fromero@proyectopastoral.org>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 4:13 PM

Good afternoon, please find the attached comment letter for submission for the record, regarding CPC-2022-4864-CA.

Please confirm receipt at your earliest convenience, thank you.

--



Francisco Romero

He/Him/His

Program Manager of Community Transformation

135 N. Mission Road

Los Angeles, CA 90033

Email: fromero@proyectopastoral.org

Phone: (323) 685-5691 (Closed Temporarily)

Alternate Phone: (323) 545-3195



PBH Letter of Support - RE_ CPC-2022-4864-CA.docx (1) (2).pdf
181K

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:32 AM

To: Francisco Romero <fromero@proyectopastoral.org>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

9/12/22, 9:13 PM

City of Los Angeles Mail - Comment Letter - CPC-2022-4864-CA

Thank you.

[Quoted text hidden]

August 31, 2022

RE: CPC-2022-4864-CA

Los Angeles City Planning Department
200 North Spring Street, Room 701
Los Angeles, CA 90012
planning.oildrilling@lacity.org

Dear Los Angeles City Planning Department:

On behalf of Promesa Boyle Heights, we are writing to voice our strong support for the adoption of the proposed oil well ordinance that would declare oil drilling a non-conforming land use city-wide. We applaud the Planning Department for a strong draft ordinance and for moving expeditiously now following a five-year process in the Los Angeles City Council. We urge the City to adopt this ordinance into law by the end of the year.

The health and safety impacts of oil extraction in neighborhoods are well documented. Equally well-documented is the environmental racism manifested in those impacts being disproportionately experienced by low-income Black and Latinx Angelenos. To fulfill its claim to leadership on environmental and climate issues, Los Angeles must move quickly to phase out fossil fuels completely, including a ban on oil extraction city-wide.

Promesa Boyle Heights is a collaborative working in the community and at five schools in Boyle Heights, and we are comprised of 60+ adult and young residents and 20+ school-based partners and local organizations working together to ensure individuals have access to a range of supports in the home, in our schools, and in the community to foster school and life success. ***We are committed to advancing wellness opportunities for families and creating access to 21st century healthy environments for our students.***

To ensure the strongest ordinance possible, we urge the Planning Department to make the following amendments and clarifications to the draft before presenting it to the City Planning Commission:

1. **Maintain existing protections in the City's code.** While advocates and residents have expressed concern for years that the City's existing regulations over oil extraction are insufficient, we are concerned that the existing draft proposes to strike them from the code completely and leave the City with even fewer tools to protect residents from dangerous drilling during a likely multi-year phase-out period.
2. **Prohibit "maintenance" activities**, including acidization and acid well maintenance, that pose an ongoing threat to health and safety and extend the life of a drill site.
3. **Incorporate a clear timeframe of no more than five years and strong standards for well plugging and site remediation**, including mechanisms to ensure oil companies pay for these activities. Oil drilling sites should be rezoned to promote healthy and community-serving land use following a process with robust input from the surrounding neighborhood.
4. **Enshrine a commitment to amending the existing 20-year phase-out period.** 20 years is quite simply too long for oil wells to continue operating after being declared a non-conforming land use. The city must commit to reviewing the existing phase-out following the completion of amortization studies currently being commissioned.

Thank you for considering our comments and for your work to advance this critical environmental justice policy for the City of Los Angeles.

Sincerely,



Azucena Hernandez
Co-Director of Community Transformation
Promesa Boyle Heights



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA/Proposed Oil & Gas Drilling Ordinance

2 messages

Bobbie Velasquez <bobbie314@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 11:13 AM

Dear Ms Torres:

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Martha M. Velasquez

Oils Email <planning.oildrilling@lacity.org>
To: Bobbie Velasquez <bobbie314@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:35 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Cathy Huss <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 4:48 PM

Reply-To: Cathyannhuss@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Cathy Huss

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 4:50 PM

To: Cathyannhuss@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil Well and drilling Ordinance

2 messages

Robert Rodine <polarislr@sbcglobal.net>
Reply-To: Robert Rodine <polarislr@sbcglobal.net>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:49 AM

To: Planning Staff, Planning Officers and all interested parties in the Governance of the City of Los Angeles:

I have examined the proposed Ordinance Revision, and find it to be the most absurd and self destructive act proposed for the City of Los Angeles ever.

The proposal presupposes that Oil, Gas and Oil by-products are no longer absolute necessities fundamental to life in America. Oils are key to many products not just powering our society. It is a key element in plastics, cleaning products, lubricants and are part, in one form or another, of almost every activity of our daily lives. Even the so called saviors of our environment, the electric powered automobile, will still require oil for the production of the plastic in the bodies, accessories such as headlight shields, and the simplest objects such as pedal covers and lubricants for wheel bearings and steering linkages. Gloves used in chemical work and medicine use oils, and the wiper blades that will be used on electric powered cars embody some aspect of oil.

If the minds of those who support this inane proposal were broad enough to consider the vast negative impact of this proposal it would have wound up in a waste basket or shredder (both of which have oil based components) long ago.

I beg of you, please get some smart, broad thinking, analytic people to screen absurd proposals such as this when we stand at the brink of extinction because some grossly limited thinker brings to 15 people many of whom are like minded, in seeking approval of an Ordinance such as this.

Thank you.

Respectfully,

Robert L. Rodine
14649 Tustin Street
Sherman Oaks, California
818-789-7319

Oils Email <planning.oildrilling@lacity.org>
To: Robert Rodine <polarislr@sbcglobal.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 12:07 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning

Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil drilling

2 messages

Sean McCarthy <sean@jacksonmccarthy.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:12 AM

How will you respond when oil and H2SO4 begin to leak into homes and commercial property as it did in the 80's when the Ross Dress 4 Less store blew up 3rd St?

Will you begin the pump off the tar that continues to bubble up at the La Brea Tar Pits?

This ban has not been thought out. It seems like a wish with no consideration of the environmental impacts.

Bad idea but you guys are in charge.

Sincerely,

Sean McCarthy
sean@jacksonmccarthy.com
818-389-1876

Oils Email <planning.oildrilling@lacity.org>
To: Sean McCarthy <sean@jacksonmccarthy.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:39 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and gas drilling

5 messages

'Denise Kobashikawa' via Planning Oil Drilling <planning.oildrilling@lacity.org> Mon, Aug 29, 2022 at 11:00 AM
Reply-To: Denise Kobashikawa <hangten808@yahoo.com>
To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

To whom this may concern:

Good Morning,
I am in favor of continuing the drilling of oil and gas in the San Pedro and Los Angeles areas.

Best
Denise LaBorde
808-741-9141

Sent from my iPhone

'Denise Kobashikawa' via Planning Oil Drilling <planning.oildrilling@lacity.org> Mon, Aug 29, 2022 at 11:02 AM
Reply-To: Denise Kobashikawa <hangten808@yahoo.com>
To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

Case number
CPC-2022-4864-CA

Sent from my iPhone

> On Aug 29, 2022, at 2:00 PM, Denise Kobashikawa <hangten808@yahoo.com> wrote:

>

> To whom this may concern:

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org> Mon, Aug 29, 2022 at 12:16 PM
To: Denise Kobashikawa <hangten808@yahoo.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]

'Denise Kobashikawa' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 1:32 PM

Reply-To: Denise Kobashikawa <hangten808@yahoo.com>

To: Oils Email <planning.oildrilling@lacity.org>

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

**Sincerely,
Denise LaBorde**

Sent from my iPhone

On Aug 29, 2022, at 3:17 PM, Oils Email <planning.oildrilling@lacity.org> wrote:

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 2:00 PM

To: Denise Kobashikawa <hangten808@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

2 messages

Ray BONASSI <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 11:16 AM

Reply-To: RBONASSI@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Ray BONASSI

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:20 AM

To: RBONASSI@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA2 messages

Yvonne Norton <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 11:58 AM

Reply-To: Hzl333@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Yvonne Norton

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 12:07 PM

To: Hzl333@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Jeff Basenberg <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 2:26 PM

Reply-To: ba925jeff@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Jeff Basenberg

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 2:29 PM

To: ba925jeff@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Scanned document from HP ePrint user

2 messages

eprintcenter@hp8.us <eprintcenter@hp8.us>
To: planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 4:42 PM

This email and attachment are sent on behalf of rcpg1080@gmail.com.

If you do not want to receive this email in future, you may contact rcpg1080@gmail.com directly or you may consult your email application for spam or junk email filtering options.

Regards,
HP Team



HPSCAN_20220829234121788_2022-08-29_234225030.pdf
1183K

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:02 PM

To: eprintcenter@hp8.us

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

Richard Lee Cook
% Dolly Carp
pgseastar@gmail.com
2388 Rosemary Court
Florence, OR 97439

August 29, 2022

Jennifer Torres, Depart of City Planning
200 North Spring Street, room 701
Los Angeles, CA 90012
Planning.oildrilling@lacity.org
(213) 978-3094

Dear Jennifer,

RE: CPC-2022-4864-CA

I was surprised to learn the city of Los Angeles is considering the immediate banning of new oil and gas extractions. If passed, this will also require the cessation of all existing oil and gas operations in the county.

Throughout several decades, these parcels of land allowed us to live better lives. They helped to promote our independence as a nation from foreign gas and oil sources, as well as helping to control the continued rise in prices for these natural resources considering the constant supply and demand schedules. These drilling sites helped support the needs of the entire community without being owned nor regulated by the big oil and gas companies.

My family, in the course of their history, handed down mineral rights from a small percentage of these land parcels to my parents and now to me. My hope is to continue this legacy to my son as well. This was part of my inheritance, a representation of the toil and hard work of those before me, and a strong part of my ancestry that makes me proud of their sacrifice and loyalty to this county and country. Many people have items they cherish that have been handed down to them for safe-keeping and for the lineage of the family members who will follow us on this earth. We are simply stewards of these lands and as a result, receive a small stipend from our ownership of these mineral rights. Now you want to take this hard-earned legacy away from us.

While I certainly understand the need to look to the future and deter the continued climate crisis issues, I also know that we will continue to need these particular resources, going forward,

perhaps for inventions we can't foresee or until we find another sensible, constant, source of energy for this nation that is safe for all.

It has been stated that the city now deems these drilling activities to be 'associated with potential negative health and safety impacts...'. Emphasis should be placed on "potential" as there is no indication in information I have reviewed that definitely and completely associates these drilling activities to be the primary and only source of 'negative health'. Almost every item we use in our daily lives is a source of 'negative health and safety impacts'. Simply review the recalls for consumer goods, the warnings for cigarettes and alcohol as well as genetically modified food items. Many studies have indicated their poisonous potential and health risks to the population at large but they remain on the store shelves and in the possession of consumers.

I would have to ask what concessions the city plans to make to those of us affected by the loss of these rights? How does the city plan on compensating me and others for this loss? What exactly will happen to these parcels of land once they are considered unfit for further production?

Why were there no stipulations or codes put into effect at the time these lands were put into operation or upgrades required over the years? Why did the city allow congestion and continued building to occur around these sites over the past decades? Why did growth and money take the place of 'the good of the people'? Why is a rush judgment now being sought?

Is the city also shutting down the large oil and gas companies as well for 'negative health and safety impact'? Are the emissions from these large conglomerates not affecting the 'negative health' of the individuals of the city and county?

I ask the city to reconsider this rapid termination of oil and gas drillings at these locations. I personally would like to know the exact impact these drillings (and these drillings alone) have on primary health conditions.

Do not infringe on my legacy and that of so many other Americans by this quick, hasty decision. I personally believe much more research and understanding of the entire picture is warranted prior to making a hasty, erratic decision that will affect so many.

I do hope to join the virtual presentation and public hearing zoom meeting scheduled for Tuesday, August 30, 2022.

Sincerely,

Dolly Carp / Richard Lee Cook

Sent via email: Jennifer Torres, Planning.oildrilling@lacity.org

Joe Buscaino, councilmember.buscaino@lacity.org

Eric Garcetti, Mayor.helpdesk@lacity.org



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

11 messages

Adriana Urzua <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 8:18 PM

Reply-To: Daurzua4@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Adriana Urzua

Gloria Osorio <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 10:04 PM

Reply-To: Gogoosorio@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Gloria Osorio

Byron Tejada <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 6:48 AM

Reply-To: Btejada@chla.usc.edu

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Byron Tejada

Monica Shanklin <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 7:44 AM

Reply-To: monica.shsnklin1@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Monica Shanklin

Jamie Pietropaolo <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 10:30 AM

Reply-To: email.jamiela@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Jamie Pietropaolo

Oils Email <planning.oildrilling@lacity.org>
To: Daurzua4@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:21 PM

Hello,

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Gogoosorio@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:22 PM

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To: Btejada@chla.usc.edu
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: email.jamiela@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:22 PM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: monica.shsnklin1@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:25 PM

Hello,

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Thank you.

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>
To: jenny.torres@lacity.org

Fri, Sep 2, 2022 at 2:25 PM



Address not found

Your message wasn't delivered to **monica.shsnklin1@yahoo.com** because the address couldn't be found, or is unable to receive mail.

The response from the remote server was:

552 1 Requested mail action aborted, mailbox not found

Final-Recipient: rfc822; monica.shsnklin1@yahoo.com

Action: failed

Status: 5.0.0

Remote-MTA: dns; mta7.am0.yahoodns.net. (67.195.204.72, the server for the domain yahoo.com.)

Diagnostic-Code: smtp; 552 1 Requested mail action aborted, mailbox not found

Last-Attempt-Date: Fri, 02 Sep 2022 14:25:26 -0700 (PDT)

----- Forwarded message -----

From: Oils Email <planning.oildrilling@lacity.org>

To: monica.shsnklin1@yahoo.com

Cc:

Bcc:

Date: Fri, 2 Sep 2022 14:25:14 -0700

Subject: Re: Stop policies that shut down oil & gas production: CPC-2022-4864-CA

----- Message truncated -----



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling Ordinance

2 messages

Jeanne McCoy <jeannemccoy3@gmail.com>
To: Planning.oildrilling@lacity.org

Mon, Aug 22, 2022 at 2:23 PM

I am writing to protest passing this ordinance! The wells have been there long before the homes and schools were built around them. How do you justify the loss of income for royalty income and compensate for the value of the lease?
NO on passing this ordinance!

Jeanne McCoy
CPC-2022-4864
mccoyjeannie@verizon.net

Oils Email <planning.oildrilling@lacity.org>
To: Jeanne McCoy <jeannemccoy3@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:01 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

Edalvarez@dslextreme.com <Edalvarez@dslextreme.com>

Thu, Sep 1, 2022 at 10:36 PM

Reply-To: Edalvarez@dslextreme.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Ed Alvarez

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:21 PM

To: Edalvarez@dslextreme.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA3 messages

Peter Brandlin <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 1:26 PM

Reply-To: peter_brandlin@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Peter Brandlin

Peter Brandlin <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 1:26 PM

Reply-To: peter_brandlin@yahoo.com

To: planning.oildrilling@lacity.org

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:31 PM

To: peter_brandlin@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Judy Angle <judyangle2007@att.net>

Mon, Aug 29, 2022 at 2:05 PM

To: "jennifer.a.torres@lacity.org" <jennifer.a.torres@lacity.org>

Please read the attached letter.

Thank you.

Judith Angle

**Letter Regarding Oil and Gas Drilling Ordinance, CPC-2-22-4864-CA.pdf**

658K

Oils Email <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 2:10 PM

To: Judy Angle <judyangle2007@att.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

JUDITH ANGLE

207 County Road 225
Breckenridge, Texas 76424

August 29, 2022

Jennifer Torres
Dept. of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
Planning.oildrilling@lacity.org

Councilman Joe Buscaino
City of Los Angeles, District 15
638 South Beacon Street
San Pedro, CA 90731
Councilmember.buscaino@lacity.org

Mayor Eric Garcetti
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012
Mayor.helpdesk@lacity.org

Re: Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

Dear Ladies and Gentlemen:

I am a senior citizen widow who is trying to survive on very limited monetary resources. I receive approximately \$400.00/year from this mineral estate being operated by Warren Resources. Losing this income might not sound like a substantial amount of money, but in my world, this can mean the difference in obtaining food or paying utility bills. If you pass this ordinance, you will have effectively taken my private property without any compensation.

The Fifth Amendment of the United States Constitution includes a provision known as the Takings Clause, which states that "private property [shall not] be taken for public use, without just compensation." While the Fifth Amendment by itself only applies to actions by the federal government, the Fourteenth Amendment extends the Takings Clause to actions by state and local government as well.

When the government desires to take private property, it first attempts to buy the property from the owner. If the owner refuses to sell, the government can go to court and exercise the power of eminent domain, by having the court condemn the property in favor of the government. This proposed ordinance would essentially be "taking my private property without compensation, when the oil and gas companies are already being so highly regulated as to environmental issues.

The Takings Clause imposes two requirements on government in order to exercise this power. First, the property to be acquired must be "for public use," and second, the government must pay "just compensation" to the owner of the property that is taken. The Supreme Court has long construed the term "public use" to include not only cases in which the public can arguably use the property, but also cases in which the property is not literally used by the public but the use of the property will serve a public purpose, such as reducing environmental impact on the citizenry which is what is being alleged herein. I understand the issue but I should not be harmed from regulation either.

Often when the government regulates the use of a person's property, the effect on the particular person is adverse. In 1922, in a celebrated opinion by Justice Oliver Wendell Holmes, the Court held that if a regulation went "too far," it could constitute a taking that would require just compensation by the government. Your proposed ordinance is regulation that amounts to a complete taking of my private property rights and my income and therefore, such regulation goes way too far. This proposed regulation interferes with a legitimate property right.

The Constitution erects safeguards against government taking private property and provides compensation for government regulation of private property that goes "too far." Two Supreme Court decisions offer clear guidance on situations that will categorically constitute a taking. In one decision, the Court held that regulations that deprive a person of all ability to develop or utilize his or her property for any economic purposes goes too far and requires just compensation. Another line of Supreme Court cases establishes that if the government effects a permanent physical invasion of the person's property, for example by requiring the owner to allow public access to the property, this constitutes a taking. Absent one of these two circumstances, however, the Court has said that the question whether a regulation goes too far is a contextual, ad hoc determination that involves the weighing of a number of factors. Foremost among these factors is the magnitude of the regulation's economic impact and the degree to which it interferes with legitimate private property interests.

I have not been contacted by anyone in regard to this proposed ordinance or the possibility of being compensated for "taking" my private property by this regulation until I received a letter from Warren Resources on August 19, 2022. I am deeply disappointed in this action without any regard to my private property or taking into consideration the economic hardship in which you are placing me. I am respectfully requesting this proposed ordinance be limited to new drilling operations and add stricter environmental controls on companies who have already drilled and have production. Alternatively, I would ask that you pay me the fair market value of my private mineral interest rather than taking property against the U.S. Constitution and all that America is supposed to stand for!

Thank you for your time and cooperation. Should you have any questions, do not hesitate to contact me.

Yours truly,

Judith Angle



August 17, 2022

URGENT: YOUR ROYALTY INCOME IS ABOUT TO END - PLEASE READ THE FOLLOWING BEFORE DISCARDING

JUDITH ANGLE, SUCCR TRUSTEE
2007 COUNTY RD 225
BRECKENRIDGE, TX 76424-5822

Re: **CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING**
Virtual Presentation and Public Hearing
Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

We regret to inform you that the City of Los Angeles is taking rapid steps to eliminate oil and gas operations in the County of Los Angeles. Tuesday, August 30, 2022, the City will conduct a Virtual Presentation & Public Hearing to discuss phasing out oil drilling in the City by immediately banning new oil and gas extraction and requiring the cessation of all existing oil and gas operations. The ordinance, if passed, will make existing oil operations a legally nonconforming use and mandate termination of our operations. **Cessation of Production and Royalty Income is imminent.**

Unfortunately, what this means for our owners is that the royalty income you have been receiving will end once oil and gas production does. How can you get involved? To submit comments and feedback, we encourage you to contact the following parties via email or regular mail.

- Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
Planning.oildrilling@lacity.org
(213) 978-3094
- Office of Councilman Joe Buscaino
City of Los Angeles, District 15
638 S Beacon Street
San Pedro, CA 90731
(310) 732-4515
councilmember.buscaino@lacity.org

- Mayor Eric Garcetti
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012
Mayor.helpdesk@lacity.org
(213) 978-0600

***Any written communication
must include Case Number:
CPC-2022-4864-CA.**

Warren Resources is committed to conducting business lawfully, ethically, and responsibly. We have counted ourselves stewards of the lands in which we operate recognizing that our success hinges not only on our ability to manage our assets with operational and capital discipline, but also our ongoing commitment to meet the increasing demand for energy through the safe and responsible production of our natural resources. We ask that you join us in making your voices heard and invite you to reach out to the Department of City Planning, the Office of Councilman Joe Buscaino, and the Office of Mayor Eric Garcetti to provide your comments and feedback. For more information, visit: planning.lacity.org/oil-and-gas-drilling-ordinance.

We would like to stay in touch with you. Please email ownerrelations@warrenresources.com to provide us your email address for future correspondence on these critical matters.

Sincerely,

Warren Resources, Inc.
www.warrenresources.com



Jennifer Torres <jenny.torres@lacity.org>

Oil & Gas Drilling Ordinance CPC-2022-4864-CA

2 messages

norm <larana@sc.rr.com>

Wed, Aug 31, 2022 at 9:07 AM

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing “amortization” of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

*Sincerely,
Norman Nicholson*

[5LEYV5-08QL7]

Oils Email <planning.oildrilling@lacity.org>
To: norm <larana@sc.rr.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:09 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: Case Number: CPC-2022-4864-CA

2 messages

holly.wray@hotmail.com <holly.wray@hotmail.com>
To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 2:10 PM

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

***Holly Lewis, Trustee
Marilyn A Turner Trust***

Oils Email <planning.oildrilling@lacity.org>
To: holly.wray@hotmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:13 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

FRITZROY Bartholomeusz <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 12:28 PM

Reply-To: fritzbartholomeusz@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

FRITZROY Bartholomeusz

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:29 PM

To: fritzbartholomeusz@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance

2 messages

Donna Senseman <donna@sfinehomes.com>
To: Planning.oildrilling@lacity.org

Thu, Sep 1, 2022 at 9:32 AM

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing “amortization” of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help take care of our families, medical bills, feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,

Donna Senseman

Oils Email <planning.oildrilling@lacity.org>
To: Donna Senseman <donna@sfinehomes.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:45 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

9/12/22, 9:15 PM

City of Los Angeles Mail - Proposed Oil and Gas Drilling Ordinance

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

2 messages

Desertcat11@att.net <Desertcat11@att.net>

Thu, Sep 1, 2022 at 8:44 AM

Reply-To: Desertcat11@att.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Jeannette Gaete

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:43 AM

To: Desertcat11@att.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA15 messages

Pamela Felten <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 3:28 PM

Reply-To: pfbarrow@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Pamela Felten

Pamela Felten <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 3:28 PM

Reply-To: pfbarrow@yahoo.com

To: planning.oildrilling@lacity.org

[Quoted text hidden]

Doreen Robinson <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 8:38 PM

Reply-To: Robinson.Doreen@dol.gov

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Doreen Robinson

Kyle Nicklas <mailagent@thesoftedge.com>
Reply-To: kylenicklas007@gmail.com
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 9:28 PM

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Kyle Nicklas

Andrew Rios <mailagent@thesoftedge.com>
Reply-To: Canyonmanar1@yahoo.com
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 9:40 PM

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Andrew Rios

Teresa Glass <mailagent@thesoftedge.com>
Reply-To: teresaglass5@gmail.com
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 9:48 PM

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Teresa Glass

Michael Taix <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 9:40 AM

Reply-To: mikeatrestaurant@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Michael Taix

Santiago Nieves Jr <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 10:38 AM

Reply-To: chago4949@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Santiago Nieves Jr

Oils Email <planning.oildrilling@lacity.org>
To: pfbarlow@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:55 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Robinson.Doreen@dol.gov
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:55 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning

Commission agenda will be posted 72 hours before the hearing date on our planning website:

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: kylenecklas007@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:55 AM

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Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Canyonmanar1@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:55 AM

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: teresaglass5@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:56 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: mikeatrestaurant@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:56 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: chago4949@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:56 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

9/12/22, 9:15 PM

City of Los Angeles Mail - Reject actions that will increase energy prices: CPC-2022-4864-CA

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA2 messages

Jvetrie@att.net <Jvetrie@att.net>

Thu, Sep 1, 2022 at 6:56 PM

Reply-To: Jvetrie@att.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Julia Vetrie

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:17 PM

To: Jvetrie@att.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil Ordinance Public Comment Letter; Liberty Hill Foundation

2 messages

Andres Gonzalez <agonzalez@libertyhill.org>

Fri, Sep 2, 2022 at 11:41 AM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: Michele Prichard <mprichard@libertyhill.org>, Shane Goldsmith <sgoldsmith@libertyhill.org>, Neva Chevalier <NCHEVALIER@libertyhill.org>

To whom it may concern in the City Planning Department;

Please see attached the Liberty Hill Foundation's submission for public comment on the oil phase out ordinance currently being drafted by the City Planning Department. Thank you and please let me know if there are any issues with the file.

Best,

Andres Gonzalez (he, him, his)

PROGRAM MANAGER FOR ENVIRONMENTAL JUSTICE

agonzalez@libertyhill.org

DIRECT **305.494.2919** MAIN **323.556.7200**

Liberty Hill
FOUNDATION

1001 Wilshire Blvd. PMB 2170

Los Angeles CA 90017





9_2_22 LHF Oil Ordinance Public Comment Letter.pdf
119K

Oils Email <planning.oildrilling@lacity.org>
To: Andres Gonzalez <agonzalez@libertyhill.org>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:58 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



1001 Wilshire Blvd. PMB 2170
Los Angeles CA 90017
323.556.7200
libertyhill.org

President & CEO

Shane Murphy Goldsmith

Board of Directors

Amelia Williamson
Board Co-Chair

Jared Rivera
Board Co-Chair

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Mary Ann Braubach

Jon Christensen

Marta Ferro

Julie Hermelin

Paul Hernandez

Jennifer Ito

Paula Litt

Timothy Silard

Mitchell Singer

Belen Vargas

August 31, 2022

**Los Angeles City Planning Department
200 North Spring Street, Room 701
Los Angeles, CA 90012
planning.oildrilling@lacity.org**

Dear Los Angeles City Planning Department:

On behalf of the Liberty Hill Foundation, we are writing to voice our strong support for the adoption of the proposed oil well ordinance that would declare oil drilling a non-conforming land use city-wide. We applaud the Planning Department for a strong draft ordinance and for moving expeditiously now following a five-year process in the Los Angeles City Council. We urge the City to adopt this ordinance into law by the end of the year.

The health and safety impacts of oil extraction in neighborhoods are well documented. Equally well-documented is the environmental racism manifested in those impacts being disproportionately experienced by low-income Black and Latinx Angelenos. To fulfill its claim to leadership on environmental and climate issues, Los Angeles must move quickly to phase out fossil fuels completely, including a ban on oil extraction city-wide.

Our organization has been working with community-based organizations to end oil and gas drilling in LA since 2013, helping lead to the formation of STAND LA. We believe that a path to the phase out of oil production must be driven by community voices who have repeatedly urged for a swift amortization of oil and gas wells through a phase out process that ensures the highest standards of public health protections.

To ensure the strongest ordinance possible, we urge the Planning Department to make the following amendments and clarifications to the draft before presenting it to the City Planning Commission:

1. Maintain existing protections in the City's code. While advocates and residents have expressed concern for years that the City's existing regulations over oil extraction are insufficient, we are concerned that the existing draft proposes to strike them from the code completely and leave the City with even fewer tools to protect residents from dangerous drilling during a likely multi-year phase-out period.

2. Prohibit “maintenance” activities, including acidization and acid well maintenance, that pose an ongoing threat to health and safety and extend the life of a drill site.
3. Incorporate a clear timeframe of no more than five years and strong standards for well plugging and site remediation, including mechanisms to ensure oil companies pay for these activities. Oil drilling sites should be rezoned to promote healthy and community-serving land use following a process with robust input from the surrounding neighborhood.
4. Enshrine a commitment to amending the existing 20-year phase-out period. 20 years is quite simply too long for oil wells to continue operating after being declared a non-conforming land use. The city must commit to amending the existing phase-out following the completion of amortization studies currently being commissioned.

Thank you for considering our comments and for your work to advance this critical environmental justice policy for the City of Los Angeles.

Sincerely,

A handwritten signature in black ink, appearing to read "Shane Goldsmith", with a stylized flourish at the end.

Shane Murphy Goldsmith

President/CEO

sgoldsmith@libertyhill.org



Jennifer Torres <jenny.torres@lacity.org>

City of Long Beach Comments

Tyler Curley <Tyler.Curley@longbeach.gov>
To: "Planning.OilDrilling@lacity.org" <Planning.OilDrilling@lacity.org>
Cc: Kevin Tougas <Kevin.Tougas@longbeach.gov>

Fri, Sep 2, 2022 at 10:49 AM

Hello,

Please see the City of Long Beach's comments related to Council File 17-0447. If you have any questions, please let us know.

Best,

Tyler

Tyler Bonanno-Curley, Ph.D.

Manager of Government Affairs

Pronouns: he, him, his

Office of the City Manager | Government Affairs

411 W. Ocean Blvd., 10th Floor | Long Beach, CA 90802

Office: (562) 570-5715

CITY OF
LONG BEACH



City of Long Beach Public Comment_Los Angeles City Council File 17-0447.pdf
2738K

September 1, 2022

Los Angeles City Council
200 N. Spring St.
Los Angeles, CA 90012

RE: Public Comment—Los Angeles City Council File 17-0447

Dear Los Angeles City Councilmembers,

On behalf of the City of Long Beach (City), I write to provide comments regarding Los Angeles City Council **File 17-0447**. The City fully supports the intent of the ordinance to advance health equity and mitigate the impacts of climate change, and Long Beach has been a leader in this field. Long Beach knows that oil is not in our long-term future, but any transition requires meticulous planning, funding of environmental responsibilities, and recognition of legal commitments entered into by previous legislative bodies.

The City is the owner and operator of oil and gas wells within the City of Los Angeles. The wells produce from the Wilmington Oil Field and the surface locations are spread throughout the Port of Long Beach. Some of the land owned by the Port of Long Beach resides within the boundaries of the City of Los Angeles. The wells are located on property located in the M3 Zone. The proposed ordinance would have significant impacts on the City's ability to safely manage the environmental risk of subsidence at these sites; reserve funding for oil well abandonment; and fund climate, health, and youth programs in Long Beach.

Attached is a schematic of the location of oil and gas operations within the City of Los Angeles and a letter we provided to the State expressing concerns about the impacts of Senate Bill 1137—legislation that is related to the proposed Los Angeles City Council ordinance. The State legislation does allow for notices of intention “to prevent or respond to a threat to public health, safety, or the environment,” which we recommend including in the City ordinance to permit activities to address and manage subsidence.

If you have any questions, please do not hesitate to contact Tyler Bonanno-Curley, Manager of Government Affairs, at Tyler.Curley@longbeach.gov or 562-570-5715.

Sincerely,



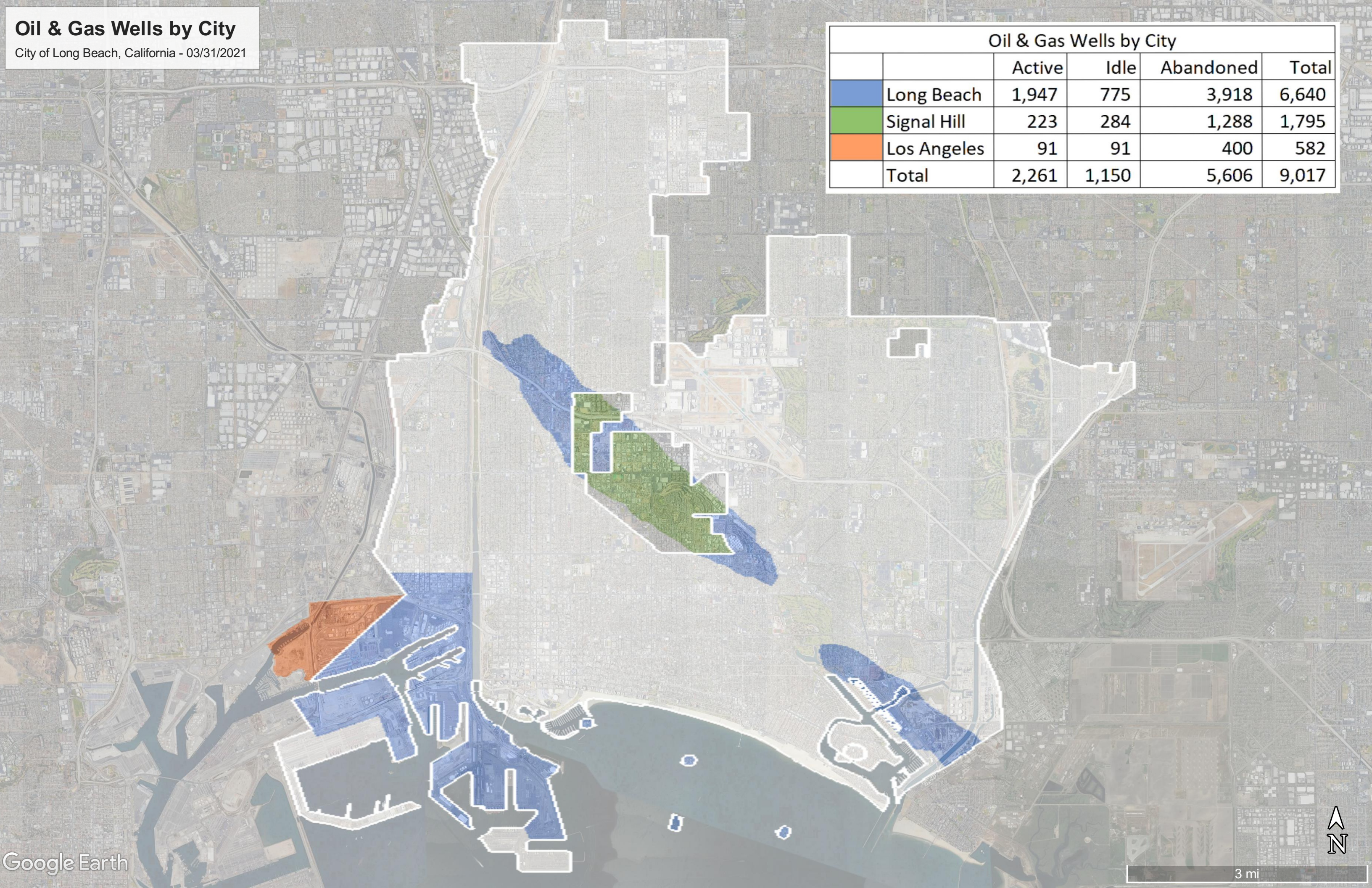
THOMAS B. MODICA
City Manager

Attachments



Oil & Gas Wells by City
City of Long Beach, California - 03/31/2021

Oil & Gas Wells by City					
		Active	Idle	Abandoned	Total
	Long Beach	1,947	775	3,918	6,640
	Signal Hill	223	284	1,288	1,795
	Los Angeles	91	91	400	582
	Total	2,261	1,150	5,606	9,017



August 27, 2022

RE: Concerns Related to the Potential Impacts of Senate Bill 1137 (Gonzalez and Limón)—Oil and Gas Operations

Dear Long Beach Delegation Members,

I write to express the City of Long Beach's substantial concerns related to the potential impacts of Senate Bill 1137 (Gonzalez and Limón). The City fully supports the intent of the legislation to advance health equity and mitigate the impacts of climate change, and Long Beach has been a leader in this field. However, if passed, SB 1137 would have significant impacts on the City's ability to safely manage the environmental risk of subsidence; reserve funding for oil well abandonment; and fund climate, health, and youth programs in Long Beach. Long Beach knows that oil is not in our long-term future, but any transition requires meticulous planning, funding of environmental responsibilities, and recognition of legal commitments entered into by previous legislative bodies.

Approximately Half of the Long Beach Unit Likely Affected

SB 1137's proposed setback for oil and gas wells within 3,200 feet of sensitive receptors is much more expansive than what the Legislature and CalGEM have previously proposed. City staff estimate that at least half of the Long Beach Unit could be directly impacted. For wells within this greatly expanded setback distance, the bill would eliminate any opportunity to repair or maintain existing well operations, redrill wells within existing surface locations, and limit the City's ability to address subsidence through injection wells.

Long Beach Already Planning for a Potential 2035 End Date

In line with the legislation's intent, the City is currently planning for a phase-out of oil and gas extraction activities as early as 2035, by funding an aggressive abandonment program. The City's proposed FY 23 budget includes funding to study the legal and contractual obligations, financial liabilities, and other consequences of this transition. SB 1137 would significantly expedite the City's current timeline, thereby undermining the City's and the State's efforts to fully fund abandonment and the environmental responsibilities owed by the oil field itself. Significant changes to this timeline will burden taxpayers with the responsibility to abandon the wells, rather than appropriately placing that burden on the oil field.

Environmental Liability Underfunded – Proposal Transfers Responsibility to Taxpayers

The City's abandonment liability is estimated between \$140-180 million, and we have reserved roughly 45 percent of the lower amount or \$60 million. The State also has an abandonment liability upwards of \$1 billion but have only reserved \$300 million, far behind the City's efforts. This year with oil prices at historic highs, the City has initiated an increase of 25 percent more to save for the City's abandonment liability costs by 2035. However, by ending oil production well before we can reserve the full abandonment liability, the City and State would have to identify alternative resources to fill the gap, in the hundreds of millions of dollars, burdening taxpayers rather than the oil field to fund this responsibility.



Significant Local and State Revenue Impacts Projected

Oil revenues are dependent on the price of oil and the amount of oil extracted at any given time. At elevated oil prices over the past year, it is estimated that the State will net approximately \$140 million in this fiscal year. For FY 23, the City anticipates nearly \$20 million in oil revenues from the Tidelands and another \$8 million from the Uplands, with nearly \$9 million of those revenues reserved for abandonment. These funds are essential to support capital improvement projects for the City.

Proposal Would Reduce Funding for Equity, Youth Programs, Public Health and Public Safety

Furthermore, through citizen-passed initiatives, the City allocates additional oil revenues to public safety, climate action, youth programs, and public health—all of which will be negatively impacted by the severe decline in revenues due to SB 1137. In FY 23 alone, \$2.7 million will support public safety and another \$1.24 million will fund climate action and environmental programs, public health equity, and children and youth services. The proposed legislation would directly undermine the City's ability to fund these vital programs, leading to large reductions in these critical areas.

Future Environmental Risk Not Considered

The proposal not only poses fiscal impacts to the City and State but also environmental risks. Well after oil extraction ends, the City has a responsibility to manage the issue of subsidence. The legislation does not clearly allow for activities such as the drilling of injection wells to prevent subsidence, which would be detrimental to the health and safety of surrounding communities. Moreover, the proposal would hamper our ability to continue the wetlands habitat restoration project in the Los Cerritos wetlands.

A Thoughtful Long-Term Approach is Needed

The State just engaged in a thoughtful effort to phase out the use of gas automobiles by 2035, creating time for the industry and local economies to adapt. The same thoughtful, long-term approach should be used to consider the economic, environmental, and legal aspects to oil production in California. We urge the State Legislature to consider the magnitude of the decision before them, and take the time to fully understand the issue, weigh the legal and environmental commitments, and take amendments to this proposal or other action to address the issues outlined above.

If you have any questions about the impacts of this legislation on the City's efforts to save for abandonment, manage the issue of subsidence, or fund critical community programs and capital projects, please do not hesitate to contact Tyler Bonanno-Curley, Manager of Government Affairs, at Tyler.Curley@longbeach.gov or 562-570-5715.

Sincerely,



THOMAS B. MODICA
City Manager





Jennifer Torres <jenny.torres@lacity.org>

Oiul Drilling

2 messages

loreeb@cox.net <loreeb@cox.net>
To: planning.oildrilling@lacity.org
Cc: Loree Blough <loreeb@cox.net>

Thu, Aug 25, 2022 at 6:14 PM

A response would be appreciated.

Thank you



Oil Rights Torres.docx
16K

Oils Email <planning.oildrilling@lacity.org>
To: loreeb@cox.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:31 AM

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commision on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings. For more information regarding the proposed ordinance, please visit the ordinance website: <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

August 25, 2022

Dear Ms. Torres,

I am writing you regarding case #: CPC-2022-4884-CA.

My family & I are third generation LA residents, having owned several pieces of property in Wilmington Calif. As I am sure you know the entire Wilmington, Carson, Long Beach, Port of LA, & Signal Hill area grew because of oil & gas. We have successfully co-existed with refineries and oil pumping rigs for over 60 years. This was a way of life for those of us who lived in this area. My first job was as an Engineer at Texaco refinery in Wilmington. My father owned a hardware store that catered to the oil industry. Oil & gas have, been & remain good for the growth of the area.

When these LA homes were purchased, people knew about the industry in the area and accepted it. Now you are voting to stop what built this area?!?!? Your actions remind me of people that purchase property next to an existing airport & then attempt to close or restrict flights at the airport.

My parents & grandparents both kept their mineral rights even though they received hundreds of offers over the years to purchase them. As a result, over the past 55 + years, my family has come to depend on this oil income. Now that our entire family has retired, losing this income cause a significant decline in our way of life.

Approximately 3 years ago I spent ~\$5,500 with an attorney to have my grandparents' mineral rights transferred into my name. I knew this would be a long ROI but I thought it was worth it. Never in my wildest imagination would I have thought that something like this would happen.

Several questions come to mind:

- Why are you attempting to change the very fiber that the LA area was built on?

- Why have there been no notifications, to the mineral right holders regarding this meeting &/or related votes?
- Why such a short notification period?
- What industry will be introduced to replace the oil industry?

I sit on several Board of Directors and know that the answer to some of these questions is, that you have your minds made up & do not want the feedback!

I am sure you have ample reasons for considering this major change in the way LA conducts business, but I beg you to consider the downstream, perhaps not so visible effects, of your proposed actions.

Perhaps a compromise might be to stop future drilling but allow current production to continue.

Please remember that you are representing all the people and not just special interest groups.

Please feel free to contact me at 949 441-6526 or loreeb@cox.net

Sincerely.

Loree L. Blough



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Maria Patiño Gutierrez <mpatino@saje.net>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 4:41 PM

To whom it may concern,

Please see attached public comment letter.

Thank you

--

Maria Patiño Gutierrez
Director of Policy and Research
Equitable Development
Pronouns: She/Her/They
SAJE-Strategic Actions for a Just Economy
www.saje.net
152 W. 32nd Street, Los Angeles, CA 90007
Work Mobile: 213-554-7125

<https://saje.nationbuilder.com/>**SAJE_CPC-2022-4864-CA.pdf**
96K

Oils Email <planning.oildrilling@lacity.org>
To: Maria Patiño Gutierrez <mpatino@saje.net>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 10:51 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.



August 30, 2022

Los Angeles City Planning Department
200 North Spring Street, Room 701
Los Angeles, CA 90012
planning.oildrilling@lacity.org
Case Number: CPC-2022-4864-CA

Dear Los Angeles City Planning Department:

We, Strategic Actions for a Just Economy (SAJE), are writing to voice our strong support for the adoption of the proposed oil well ordinance that would declare oil drilling a non-conforming land use city-wide. We applaud the Planning Department for a strong draft ordinance and for moving expeditiously now following a five-year process in the Los Angeles City Council. We urge the City to adopt this ordinance into law by the end of the year.

The health and safety impacts of oil extraction in neighborhoods are well documented. Equally well-documented is the environmental racism manifested in those impacts being disproportionately experienced by low-income Black and Latinx Angelenos. To fulfill its claim to leadership on environmental and climate issues, Los Angeles must move quickly to phase out fossil fuels completely, including a ban on oil extraction city-wide.

Our organization, SAJE, works in South Los Angeles to build community power for economic justice. We focus on tenant rights, equitable development and healthy housing. We believe that healthy housing is a human right and we believe making amendments to the draft ordinance would result in a more equitable ordinance.

To ensure the strongest ordinance possible, we urge the Planning Department to make the following amendments and clarifications to the draft before presenting it to the City Planning Commission:

1. **Maintain existing protections in the City's code.** While advocates and residents have expressed concern for years that the City's existing regulations over oil extraction are insufficient, we are concerned that the existing draft proposes to strike them from the code completely and leave the City with even fewer tools to protect residents from dangerous drilling during a likely multi-year phase-out period.
2. **Prohibit "maintenance" activities**, including acidization and acid well maintenance, that pose an ongoing threat to health and safety and extend the life of a drill site.
3. **Incorporate a clear 5-year timeframe and strong standards for well plugging and site remediation**, including mechanisms to ensure oil companies pay for these

activities. Oil drilling sites should be rezoned to promote healthy and community-serving land use following a process with robust input from the surrounding neighborhood.

4. **Enshrine a commitment to amending the existing 20-year phase-out period.** 20 years is quite simply too long for oil wells to continue operating after being declared a non-conforming land use. The city must commit to reviewing the existing phase-out following the completion of amortization studies currently being commissioned.

Thank you for considering our comments and for your work to advance this critical environmental justice policy for the City of Los Angeles.

Sincerely,

Maria Patiño Gutierrez
Strategic Actions for a Just Economy (SAJE)

mpatino@saje.net



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'Diane Obright' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 7:40 AM

Reply-To: Diane Obright <dobright@mac.com>

To: Oils Email <planning.oildrilling@lacity.org>

I just read through Gabriela Medina's letter to those of us who had comments on the plan to ramp down oil production in LA in the interest of forcing EVs on everyone here.

In today's news, while LA is busy planning the demise of oil production, California is telling people NOT to strain the power grid by plugging in their EVs. Elon Musk has also opined there is not enough electricity available at this time for everyone to power their EVs.

I would think the focus of LA should be on building up the electrical grid before you do *anything* else. It seems very premature to force Californians to switch to EVs when it is widely known there is not enough electricity to meet the needs to power them. The matter of replacing \$30,000 batteries is a different subject altogether but one that threatens the viability of forcing everyone to drive EVs.

As beautiful a state as it is, California is also something a laughing stock among more viable states (and rational Californians) and an example of how NOT to do things. Let's not make matters worse.

Diane Obright
858-717-1894
[810 Val Sereno Dr.](#)
[Olivenhain, CA 92024](#)
dobright@me.com

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:39 AM

To: Diane Obright <dobright@mac.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

4 messages

Janet Maggs <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 1:48 PM

Reply-To: Janma5@verizon.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

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Case Number: CPC-2022-4864-CA

Sincerely,

Janet Maggs

Susan Crosthwaite <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 3:04 PM

Reply-To: Susanyourmt@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Susan Crosthwaite

Oils Email <planning.oildrilling@lacity.org>
To: Susanyourmt@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 3:08 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Janma5@verizon.net
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 3:08 PM

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Thank you.

9/12/22, 9:18 PM

City of Los Angeles Mail - Stop policies that shut down oil & gas production: CPC-2022-4864-CA

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

'BARBARA HARDESTY' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Aug 26, 2022 at 9:53 AM

Reply-To: BARBARA HARDESTY <barb.h@verizon.net>

To: planning.oildrilling@lacity.org

Please tell me why you want to stop pumping oil when,
550,000 barrels a day are imported from Saudi Arabia.
A million barrels per day from OPEC.
7.5 million per day from non OPEC.
I would appreciate an explanation why you want to cut our oil production. Thank you.
Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 11:32 AM

To: BARBARA HARDESTY <barb.h@verizon.net>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

We apologize for the delay in response. Thank you for your question and/or statement, it will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA

2 messages

Naomi Ramirez <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 12:20 PM

Reply-To: B1conscious@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Naomi Ramirez

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:23 PM

To: B1conscious@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA20 messages

Natalia Solakian <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 5:48 PM

Reply-To: nataliasolakian34@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Natalia Solakian

Dinorah Izaguirre <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 6:22 PM

Reply-To: iz1967@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Dinorah Izaguirre

Carmen Garcia <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 10:46 PM

Reply-To: canelamoo@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Carmen Garcia

Robert Smith <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 11:40 PM

Reply-To: Pleiku196970@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Robert Smith

Dwayne Coleman <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 12:12 AM

Reply-To: dwayne.coleman55@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

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Case Number: CPC-2022-4864-CA

Sincerely,

Dwayne Coleman

Michael Rodriguez <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 6:10 AM

Reply-To: michaelrod1956@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Michael Rodriguez

Marisol Reyes <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 7:08 AM

Reply-To: Mari.rey0612@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Marisol Reyes

Monica Shanklin <mailagent@thesoftedge.com>
Reply-To: monica.shsnklin1@yahoo.com
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 7:44 AM

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

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Case Number: CPC-2022-4864-CA

Sincerely,

Monica Shanklin

Monica Shanklin <mailagent@thesoftedge.com>
Reply-To: monica.shsnklin1@yahoo.com
To: planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 10:00 AM

[Quoted text hidden]

Maryanne Greenberg <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 11:32 AM

Reply-To: maryanne3935@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Maryanne Greenberg

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:36 PM

To: nataliasolakian34@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:36 PM

To: iz1967@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:36 PM

To: canelamoo@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:36 PM

To: Pleiku196970@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: dwayne.coleman55@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:36 PM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: michaelrod1956@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Mari.rey0612@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:37 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:37 PM

To: monica.shsnklin1@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Mail Delivery Subsystem <mailer-daemon@googlemail.com>

Fri, Sep 2, 2022 at 2:37 PM

To: jenny.torres@lacity.org



Address not found

Your message wasn't delivered to **monica.shsnklin1@yahoo.com** because the address couldn't be found, or is unable to receive mail.

The response from the remote server was:

552 1 Requested mail action aborted, mailbox not found

Final-Recipient: rfc822; monica.shsnklin1@yahoo.com
Action: failed
Status: 5.0.0
Remote-MTA: dns; mta6.am0.yahoodns.net. (67.195.228.109, the server for the domain yahoo.com.)
Diagnostic-Code: smtp; 552 1 Requested mail action aborted, mailbox not found
Last-Attempt-Date: Fri, 02 Sep 2022 14:37:28 -0700 (PDT)

----- Forwarded message -----

From: Oils Email <planning.oildrilling@lacity.org>
To: monica.shsnklin1@yahoo.com
Cc:
Bcc:
Date: Fri, 2 Sep 2022 14:37:15 -0700
Subject: Re: Reject actions that will increase energy prices: CPC-2022-4864-CA
----- Message truncated -----

Oils Email <planning.oildrilling@lacity.org>
To: maryanne3935@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:37 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4864-CA

2 messages

Pam Holtgren <pam.holtgren@gmail.com>
To: Planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 12:25 PM

Dear Ms. Jennifer Torres,

We own property interests in the form of mineral rights located within the City of Los Angeles. I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While I understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests - or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,
Pamela H. Flores

Oils Email <planning.oildrilling@lacity.org>
To: Pam Holtgren <pam.holtgren@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:23 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA2 messages

Andrew Aguero <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 1:50 PM

Reply-To: andrewaguero22@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Andrew Aguero

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:55 PM

To: andrewaguero22@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

3 messages

Jacob@rentsp.com <Jacob@rentsp.com>

Fri, Sep 2, 2022 at 10:56 AM

Reply-To: Jacob@rentsp.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Jacob Eisenberg

Jacob@rentsp.com <Jacob@rentsp.com>

Fri, Sep 2, 2022 at 12:50 PM

Reply-To: Jacob@rentsp.com

To: planning.oildrilling@lacity.org

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:39 PM

To: Jacob@rentsp.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively

scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA

3 messages

Donna-Marie Lynch <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 3:36 PM

Reply-To: grammito05@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Donna-Marie Lynch

Robert Ricewasser <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 7:38 PM

Reply-To: rricewasser@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Robert Ricewasser

Oils Email <planning.oildrilling@lacity.org>
To: grammito05@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:34 AM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Jeff Kerns <kernsjsb@gmail.com>

Tue, Aug 30, 2022 at 4:12 PM

To: Mayor.helpdesk@lacity.org, councilmember.buscaino@lacity.org, Planning.oildrilling@lacity.org

Dear Sirs,

I missed the hearing on the captioned subject, but it doesn't mean I am not interested in conveying my opinion to you. Thank you for the opportunity.

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,

Jeff Kerns

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 4:17 PM

To: Jeff Kerns <kernsjsb@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Marianne Sterling <msterling5@satx.rr.com>

Tue, Aug 30, 2022 at 10:30 AM

To: Planning.oildrilling@lacity.org, councilmember.busciano@lacity.org, Mayor.helpdesk@lacity.org

Cc: ownerrelations@warrenresourxes.com

Sir/Ma'am – I received the notice about our royalty income possibly ending do to the city of Los Angeles wanting to eliminate oil and gas operations in the county of Los Angeles. For those of us who receive royalty income and have for generations, this is so wrong! How do you possibly have a right to do this to us? If you pass this ordinance you will make existing oil operations legally nonconforming and mandate termination of operations by Warren resources. These are resources we earned and paid for! You have no right to shut them down and deny us our income. I'm asking you to NOT pass this ordinance for the sake of all of us who are in this position.

Sincerely, Marianne Sterling (LtCol USAF, Retired)

Msterling5@satx.rr.com

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:31 PM

To: Marianne Sterling <msterling5@satx.rr.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

James Reeves <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 12:04 PM

Reply-To: Reevesj@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

James Reeves

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 12:17 PM

To: Reevesj@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

City File 17-0447, Oil and Gas Drilling Ordinance, Comment Letter

2 messages

'pat allinson' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:55 PM

Reply-To: pat allinson <pallinson@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>


Cc: "Councilmember.bonin@lacity.org" <Councilmember.bonin@lacity.org>

Attached is my comment letter on the proposed Oil and Gas Drilling Ordinance.

Thank you for your time and efforts,

Pat Allinson

Del Rey Resident

 **Oil & Gas CLtr 2022 Allinson 09 02 2022..pdf**
77K**Oils Email** <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:16 PM

To: pat allinson <pallinson@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

To: Oil Regulation Code Amendment Unit
Email: planning.oildrilling@lacity.org
Phone: (213) 978-3094.

Re: City File 17-0447
Oil and Gas Drilling Ordinance

September 2, 2022

Thank you for your efforts in preparing the Oil Ordinance Fact Sheet, and the proposed Oil and Gas Drilling Ordinance (the Documents).

My most critical concern is the potential risks of the Gas Retention/Storage facilities in/under the Ballona Wetlands. Per a LA Times article (Note 1):

“the facility has a “record of [unplanned releases], is near a large population center, features [tsunami](#) and wildfire threats, and has a relatively small gas storage capacity”

I did not see these facilities and their related concerns addressed in the Documents (Note 2).

To keep all readers informed, any future Fact Sheet and/or Executive Summary or other summary document should prominently include a statement similar to:

This proposed ordinance does not address the Ballona Wetlands gas storage facilities, nor does it mitigate any existing or future risks to the public resulting from these facilities.

Thank you,

Pat Allinson
Del Rey Resident

Note 1: See the LA Times article dated April 7, 2021, including the concerns about the gas storage facility under the Ballona Wetlands (excerpts on next page):

<https://www.latimes.com/business/story/2021-04-07/aliso-canyon-natural-gas-playa-del-rey>

Note 2: from the draft ordinance, page 2 of 23, Subsection 6 (aka buried in the fine print):

“The provisions of this section shall not apply to the location of subterranean gas holding areas or oil wells which are operated as a public utility regulated by the California Public Utilities Commission”

Cc: Mike Bonin, CD11, via email

LA Times article at:

<https://www.latimes.com/business/story/2021-04-07/aliso-canyon-natural-gas-playa-del-rey>

Selected excerpts:

But 45,000 people live within a mile of Playa del Rey, compared with just 6,500 within a mile of Aliso, according to a [2018 report](#) from the California Council on Science and Technology, a nonprofit research organization established by state lawmakers.

The council's report noted that Playa del Rey had the oldest active wells of any California gas storage field, with a median drill date of 1935. It said the facility has a "record of [unplanned releases], is near a large population center, features [tsunami](#) and wildfire threats, and has a relatively small gas storage capacity."

The gas field should be studied for potential closure, the council [concluded](#).



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

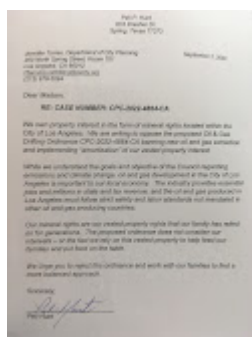
'Peli Hunt' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:52 PM

Reply-To: Peli Hunt <huntmeli@yahoo.com>

To: Planning.oildrilling@lacity.org

Sent from my iPhone

IMG_5092.JPG
2163K**Oils Email** <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:15 PM

To: Peli Hunt <huntmeli@yahoo.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email and letter. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

On Fri, Sep 2, 2022 at 2:52 PM 'Peli Hunt' via Planning Oil Drilling <planning.oildrilling@lacity.org> wrote:

Sent from my iPhone

Peli P. Hunt
610 Dresher Dr.
Spring, Texas 77373

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
Planning.oildrilling@lacity.org
(213) 978-3094

September 2, 2022

Dear Madam,

RE: CASE NUMBER: CPC-2022-4864-CA

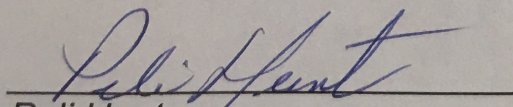
We own property interest in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We Urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,


Peli Hunt



Jennifer Torres <jenny.torres@lacity.org>

Case Number: CPC-2022-4648-CA

2 messages

Rudy Melendez <rudy@rudymelendez.com>
To: planning.oildrilling@lacity.org

Mon, Aug 29, 2022 at 4:14 PM

In response to
City Council File No. 17-0447

I am submitting public comment below.

Respectfully yours,

Rudy Melendez

Educate LA
Register to VOTE
Litter Abatement NOW

Be Smart
Do Your Part
Stop Littering California



In response to City Council File 17-0447 Public Comment Submitted by Rudy Melendez on 8:29:22.docx
16K

Oils Email <planning.oildrilling@lacity.org>
To: Rudy Melendez <rudy@rudymelendez.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 11:57 AM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

[Quoted text hidden]

Respectfully yours,

Rudy Melendez

Educate LA
Register to VOTE
Litter Abatement NOW

Be Smart
Do Your Part
Stop Littering California

Caring & Voting Citizens,

I am not sure anyone with any professional experience in the Oil and Gas business takes The State of California or any City in California as a voice of reason. Any professional that understands the importance of broadly reliable and sustainable energy would expect in the least a well thought out and presentable strategic plan to reduce the footprint of fossil fuels AND also provide the necessary, reliable and sustainable living needs to all, not some of its citizens.

It is most unfortunate that our most vocal advocates, politicians and proposed policies, ignore the daily and future annual needs of our population. It is no secret they have a megaphone and endless “journalist” domination that fills the headlines with the escalating narrative the climate is somehow suddenly catastrophic in hopes that our emotions will leapfrog our brains ability to assess fully the pros and cons of these proposed policies. All of course, while our progressive minded bankers provide lending for these advocates and politicians to buy our “dangerous” ocean front properties.

Vote the way you live, not the way you want your neighbors to live.

Make no mistake about it. The current goal is to eliminate an industry we all depend upon AND replace it with a fraction of our needs and current lifestyle. This comes with no WARNING label as to the risk and eventual results of these elected leaders and policies.

The fossil fuel industry is an industry that has and continues to provide a safer livelihood for everyone. You may want to reflect a moment as to what geographic areas and climates will suddenly become unsafe without reliable fossil fuel energy. You are in effect voting for them to become ghost towns and relocate to your moderate climate and yes, increase the homeless issue to beyond repair.

A vote to increase energy costs is a vote to increase your homeless population.

Over 3 billion people on earth still seek to utilize fossil fuels for the first time, not eliminate it. Their lives are difficult and shortened because of the lack of access to fossil fuels. They are not interested in fabricated “solutions” with politicalized models to attempt to minimalize or prevent a 10,000-year warming/cooling trend.

Our planet has a long history of volatile climate change. It is fossil fuels that built and provided the machinery to allow citizens to survive, farm, feed, medicate and thrive in acclimate areas. Remove the fossil fuel resource and billions of citizens become immediately at risk in a very short time. We are implementing a dangerous known (lack of cheap and reliable energy) in hopes of solving an unknown (climate change).

California is not leading anything except a path to global shortages that will cause an unstable and unsafe future for their citizens.

The hyperactive plan to eliminate fossil fuels and replace it with an unstable and unsafe future is irresponsible. Its “dreamy”, but impractical and not fully vetted. The alternatives pitched as a solution comes up way short and replacement as to national or global “scale” and of course, the much-needed plan is never provided.

Vote to eliminate fossil fuels and the recent taste of small supply chain issues will be magnified 100 fold.

In fact, when the alternatives (not planned or proposed publicly) are fully vetted, foot printed, and attempted, they fall way short of decreasing the emission footprint as stated and fall extremely short to the expectations our politicians and their experts claim. Just look at Europe’s results today after Trillions taxed and spent, yet they use MORE fossil fuels now than ever before. Results, not narratives, should matter.

Finally, eliminating local (USA) fossil fuel production does NOTHING to reducing emissions. In fact, it increases it. Rather than having a local less expensive fueling source, refined by the best practices in the world, Californians will be forced to import oil and natural gas from other USA States and Foreign countries.

The advocates and their policies represent a “false sense of higher moral ground”

California has the most progressive policies for corporations to operate in the country. California should be proud and promote their Oil and Gas Companies as Goldstar Cultures and well managed emissions. Instead, *you turn 180 degrees morally*, and propose to by invest (import) in countries that refuse to address ESG, Diversity Equity & Inclusion and with great conviction you show your very visible support for current horrible human rights policies and cultures in the hopes of moving the climate 1 degree Celsius.

A vote to eliminate local CA fossil fuels is a vote to invest in immoral foreign fuels that will only increase our total emissions and worse, support the complete opposite of CAs more important and humane - Diversity, Equity and Inclusion objectives.

If you think you are solving our planets issues with this policy, you are 180 degrees wrong by every measurable metric we should consider.



Jennifer Torres <jenny.torres@lacity.org>

Comment Letter - CPC-2022-4864-CA

2 messages

Sarah Taylor <staylor@wspa.org>

Thu, Sep 1, 2022 at 4:13 PM

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Good afternoon,

Attached please find a comment letter regarding the proposed Oil and Gas Drilling Ordinance (case number CPC-2022-4864-CA) submitted by Catherine Reheis-Boyd on behalf of the Western States Petroleum Association.

Please let me know if you have any questions.

Thank you,
Sarah

Sarah Taylor

DIRECTOR, ASSOCIATE COUNSEL



1415 L Street, Suite 900 Sacramento, CA 95814

C 760.420.3781

**WSPA Comment Letter - CPC-2022-4864-CA.pdf**

196K

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 4:50 PM

To: Sarah Taylor <staylor@wspa.org>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Catherine Reheis-Boyd

President and CEO

September 1, 2022

WSPA Comment Letter LA City re Oil Ban
Los Angeles City Planning Department
Oil Regulation Code Amendment Unit
Via email: planning.oildrilling@lacity.org

Re: Opposition to Oil and Gas Drilling Ordinance – Case Number CPC-2022-4864-CA

The Western States Petroleum Association (“WSPA”) appreciates this opportunity to provide comments on the proposed ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of the Los Angeles Municipal Code (“Oil Ordinance”). WSPA is a trade association that represents energy companies that explore for, produce, refine, transport and market petroleum products, natural gas, and other energy supplies in California and four other western states, including oil and gas producers in the City and County of Los Angeles.

WSPA is strongly opposed to the proposed Oil Ordinance, which seeks to: (1) prohibit new oil and gas activities citywide; (2) make existing extraction activities a nonconforming use in all zones; and (3) cease and remove all existing oil operations within a 20-year timeline.

The Oil Ordinance will increase dependence on foreign oil.

WSPA believes it is fundamentally unwise to curtail production in the state while our President is forced to call for other oil-producing nations to increase their production to avoid a global and national energy crisis. California’s oil and gas resources are produced under some of the strictest environmental and public health regulations in the world, and many of California’s refineries were specifically designed to process California crudes in the most environmentally and economically efficient manner possible. Even aside from the energy crisis, banning production in Los Angeles increases both the state’s reliance on foreign oil not subject to such rigorous environmental standards and the amount of imported crude coming through our already crowded ports.

The Oil Ordinance will have devastating economic impacts.

Currently 152,000 men and women have careers in the oil and gas industry in California and 366,000 people have careers whose jobs depend on the industry. The industry in California contributes \$152 billion every year in economic activity and directly contributes \$21.6 billion in local, state, and federal tax revenue to support schools, roads, public safety, and other vital services.

The City of Los Angeles Petroleum Administrator's 2019 report¹ to the Los Angeles City Council indicates that the oil industry contributes \$430 million annually in economic output, and more than \$270 million in gross regional product. The 1,480 direct jobs in the industry collectively bring \$155 million in labor income. These 1,480 jobs mean 1,480 careers, many of which have been the result of years of education and investment in order to support families and communities in the LA region. The average salaries in the production sector exceed \$160,000 annually.

The Oil Ordinance amounts to a taking, for which those affected must be justly compensated.

The Oil Ordinance designates existing oil wells and production facilities as nonconforming uses subject to a 20-year amortization period under Section 12.23 of the Municipal Code and eliminates the discretion currently given to the Zoning Administrator under Section 12.23 C.4(b) to allow certain nonconforming wells to continue operating after the prescribed amortization period if such continued operation would be reasonably compatible with the surrounding area. This nonconforming designation and planned phase out of existing facilities will almost certainly result in substantial financial liabilities to the City under the takings clause of the United States Constitution and comparable provisions of the California Constitution. These clauses require payment of just compensation when a government entity takes private property for a public use.

Under California law, a city may terminate nonconforming uses without compensation if the governing jurisdiction provides a reasonable amortization period "commensurate with the investment involved."² In this case, it is clear that the Municipal Code's 20-year amortization period is neither reasonable nor commensurate with the investment required to develop, construct, and maintain existing wells and production facilities. Amortization periods can adequately compensate for movable property, such as billboards or liquor stores, as owners of those businesses may recoup the entire value of their investment *and* move any remaining inventory to a new location in an appropriate zone. But amortization utterly fails as a substitute for just compensation for vested oil and gas rights, where the extraction of minerals, including an expansion of that use, is recognized and protected under the diminishing asset doctrine.³ In fact, no case has held that amortization can be used when eliminating a diminishing asset use. Because the 20-year amortization period provided for in the County Code is not commensurate with the investment involved in oil production, the Oil Ordinance constitutes a taking.

¹ City of Los Angeles, Department of Public Works, Office of Petroleum and Natural Gas Administration and Safety (OPNGAS), *Oil and Gas Health Report: A Report on Council File 17-0447 Land Use Codes / Oil and Gas Development / Impact on Resident Health and Safety / Code Change Proposals*. July 25, 2019, (p 121).

² *Metromedia, Inc. v. City of San Diego*, 26 Cal.3d 848, 882 (1980).

³ *Hansen Bros. Enters. V. Board of Supervisors*, 12 Cal.4th 533 (1996).

WSPA hopes that the City Planning Department seriously considers the issues raised in this letter and the risks associated with moving forward with the proposed Oil Ordinance.

Respectfully,

A handwritten signature in blue ink, reading "Catherine Reheis-Boyd". The signature is fluid and cursive, with the first name "Catherine" and last name "Boyd" being more prominent than the middle name "Reheis".

Catherine Reheis-Boyd
President and CEO



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA2 messages

Peter Brandlin <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 3:14 PM

Reply-To: peter_brandlin@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Peter Brandlin

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:19 PM

To: peter_brandlin@yahoo.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

6 messages

Keith Morris <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 7:02 PM

Reply-To: doctorkeithmorris985@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Keith Morris

Sophia Jacobo <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 7:16 PM

Reply-To: sofiaj68@icloud.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Sophia Jacobo

Mary Cervsntes <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 8:08 PM

Reply-To: ricolicha@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Mary Cervsntes

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:19 PM

To: doctorkeithmorris985@gmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: sofiaj68@icloud.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:19 PM

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[Quoted text hidden]

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To: ricolicha@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

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Thank you.

9/12/22, 9:20 PM

City of Los Angeles Mail - Please reject actions that increase energy prices: CPC-2022-4864-CA

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

frankntinaparra@hotmail.com <frankntinaparra@hotmail.com>

Thu, Sep 1, 2022 at 9:36 PM

Reply-To: frankntinaparra@hotmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Tina Parra

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:19 PM

To: frankntinaparra@hotmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

suzanne birkhofer <sbirkhofer@hotmail.com>
To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>
Cc: "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>

Mon, Aug 29, 2022 at 2:15 PM

Please read the attached letter.

Sent from [Mail](#) for Windows



Warren Resources.docx
15K

Oils Email <planning.oildrilling@lacity.org>
To: suzanne birkhofer <sbirkhofer@hotmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Mon, Aug 29, 2022 at 2:46 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]

August 26, 2022

Case Number: CPC-2022-4864-CA

Dear Sirs,

I own property interests in the form of mineral rights located in the City of Los Angeles. I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning all new gas and oil extraction and implementing “amortization” of my vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, (the jobs you always say you support when running for office) providing opportunities to many with only a high school diploma or less.

Most importantly, oil and gas development in Los Angeles and California is done cleaner with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that are dirtier and create more pollution when transported. You have set high environmental standards which we meet unlike other countries.

As much as you hate oil and gas, it is the only reliable, safe and proven source of energy that we can currently **DEPEND** on. You may wish that wind and solar

can do the job to fuel our industrialized and productive society but it cannot and will never fulfil that wish. Our ingenuity, creativity and technology will. Until then, please face reality. We need much more oil and clean gas as we can domestically produce. Nuclear is also very viable.

As a third generation Californian and Angeleno, I am ashamed of the condition that I find this once fine city in. I advise those that were elected and are paid by the citizens to prioritize their time and energy. I would start with CRIME of all types, petty up to criminal and then clean up our streets but most importantly, our schools are a disgrace. Start with these.

I hope you decide wisely and do the right thing,

Suzanne Armet Birkhofer



Jennifer Torres <jenny.torres@lacity.org>

Case number CPC-2022-4864-CA

2 messages

Robert Perez <robertfperez@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 1:30 PM

I received a letter about the city's plan to cessation of royalty income for my stake in Warren Resources. Please update my address and send emails to this email address.

Robert Perez
4815 E 143rd Ave.
Thornton, CO 80602-8919
robertfperez@gmail.com
Case number CPC-2022-4864-CA

Oils Email <planning.oildrilling@lacity.org>
To: Robert Perez <robertfperez@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:07 PM

Hello,

Thank you for your interest in the Oil and Gas Drilling Ordinance. Your contact information has been added to the Interested parties list and you'll be notified of the progress of the Oil and Gas Drilling Ordinance.

The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website: planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website: <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

LA City Planning Dept. Case number CPC-2022-4864-CA

2 messages

Ted.Cordova <Ted.Cordova@ebresources.com>

Fri, Sep 2, 2022 at 2:24 PM

To: Los Angeles City Planning <planning.oildrilling@lacity.org>

Please find attached our comments for your records.

Thank you,

Ted

Ted Cordova

E&B Natural Resources

562-548-6806

www.ebresources.com

IMPORTANT NOTICE: The information in this e-mail is confidential and may also be privileged. If you are not the intended recipient, any use or dissemination of the information and any disclosure or copying of this email is unauthorized and strictly prohibited. If you have received this email in error, please promptly inform us by reply email or telephone. You should also delete this email and destroy any hard copies produced immediately.

**Letter to Planning Dept final.pdf**

180K

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:14 PM

To: "Ted.Cordova" <Ted.Cordova@ebresources.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



1608 Norris Road • Bakersfield, CA 93308

August 31, 2022

Los Angeles City Planning Department
Sent via email: planning.oildrilling@lacity.org

Re: Oil & Gas Ordinance Draft, case number CPC-2022-4864-CA.

Dear Los Angeles City Planning Department / Oil Regulation Code Amendment Unit:

E&B Natural Resources (E&B) provides the following comments relating to the Los Angeles City proposed draft Oil & Gas Ordinance.

E&B is a California-based energy producer. We produce over 8,000 barrels of oil per day for Californians including Angelenos. E&B and its affiliates including HBOC complies with rules and regulations administered by multiple agencies at the local, state, and federal levels. We have a personal and collective interest in adhering to California's stringent environmental regulations to protect the safety of our workforce. We are dedicated to producing the cleanest and most environmentally friendly oil and natural gas that meets California climate compliancy. We have over 250 staff working for E&B, many in the Los Angeles area. We also provide monthly royalties to thousands of royalty owners in the local area. We have been a long-time partner to the city, active in the local community and we look forward to continuing to work with LA City on the draft ordinance.

We have all witnessed over these last weeks, months and years (i.e., Ukraine and Russia event, COVID-19, supply chain issues, etc.) how important it is to be able to source locally and buy locally. California, the fifth largest economy in the world, demands nearly 1.8 million barrels of oil per day and local in-state production only supplies roughly 30% of our state needs. We believe that while demand for the product remains strong, it is best for the local and state economies and the environment to have the ability to procure product locally than from foreign sources including from Ecuador, Saudi Arabia and Russia who don't have the same environmental regulations as California. Our workforce and product have been recognized as critical and essential to our nation and to our state.

We recognize the need for improvement and for change. We believe we can work together to achieve an ordinance that works for the majority of the stakeholders. We appreciate the work staff has done thus far. We offer the following thoughts and recommendations.

California • Kansas • Louisiana • Wyoming

Bus: (661) 387-8500 • www.ebresources.com • Fax: (661) 687-8690



1608 Norris Road • Bakersfield, CA 93308

Study Economic and Environmental Impacts. Mitigate for potential unintended consequences.

We recommend the city to study the environmental impacts of losing its local production, particularly impacts to air emissions. Where is LA City going to get its oil from? Reducing local production often leads to an increase in foreign imports. California is an energy island and there is not any infrastructure like oil pipelines to carry oil into the state from other states. These foreign imports would increase super tanker traffic to our local ports in Long Beach and Los Angeles. According to the South Coast Air Quality Management District, the number one source of toxic pollution in the LA Basin comes directly from port ships including supertankers carrying foreign oil. We also urge the city to study the countries supplying foreign imports, their human rights records and the countries' environmental regulations including Ecuador, Saudi Arabia and Iraq. We also recognize the on-going job transition study, and we would like to see that finalized prior to taking this policy forward. Negative consequences due to the proposed policy should be acknowledged and addressed.

Amortization Study and Legal Analysis should be made public by the City Attorney's Office prior to moving forward with this policy.

In the proposed ordinance, the city calls for an amortization period of existing wells and facilities of twenty years. The city, however, has not provided an amortization study to support the 20-year time frame, nor has it explained how such an amortization program is legally authorized for mineral resources. We believe that the city's "potential" amortization program / period has no support in fact or in law and instead serves only to violate E&B and HBOC's constitutionally protected vested rights as well as the rights of the mineral owners. We recommend that the city work with the operators and stakeholders on the amortization study, and we work together to find the right balance of best practices, regulations and good neighbor provisions.

Prohibition on Maintenance Activities is inconsistent with State law and further violates constitutional protections.

The draft ordinance does not allow for maintenance activities which could jeopardize field safety and reliability. There are numerous activities conducted on an oil field to maintain equipment or take other actions to enhance the safe and reliable operation of the field. There are numerous activities that are required by law. Taking away our rights to maintain our wells could pose numerous unintended consequences. We recommend allowing operators to continue to maintain their wells in a safe and responsible manner. Anything less would be reckless and potentially unconstitutional. Let's move forward with smart regulation. We are ready to work with you and your staff on these specific issues. In fact, we have been working with community, neighborhood councils and local council offices to voluntarily move forward with several best practices and emerging technologies to keep our sites performing optimally. We were the first to implement fence line air monitoring systems, advocate for annual inspections and volunteer for additional reporting requirements.

California • Kansas • Louisiana • Wyoming

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1608 Norris Road • Bakersfield, CA 93308

In regard to plugging and abandoning wells, we recommend that you continue to engage operators in these discussions, work with the state agency CalGEM, and stay consistent with state law and the state idle well program.

It is our hope that we can continue to work together towards an improved ordinance that works for all parties. Please do not hesitate to call upon us for additional information. Please use us as a resource. Thank you for your time and consideration of our comments.

Best regards,

A handwritten signature in blue ink, appearing to read 'Louis Zylstra', with a stylized flourish at the end.

Louis Zylstra, PE
Senior Vice President, Los Angeles Basin
E&B Natural Resources
Tel: 714.968.4770
Email: lou.zylstra@ebresources.com

REFERENCES

1. South Coast Air Quality Management District,
<https://www.aqmd.gov/nav/about/initiatives/clean-port>

California • Kansas • Louisiana • Wyoming

Bus: (661) 387-8500 • www.ebresources.com • Fax: (661) 687-8690



Jennifer Torres <jenny.torres@lacity.org>

Proposed Ordinance CPC-2022-4864-CA

2 messages

Thomas Henry <slenry@gmail.com>

Wed, Aug 31, 2022 at 11:03 AM

To: "Planning.oildrilling@lacity.org" <Planning.oildrilling@lacity.org>, "councilmember.buscaino@lacity.org" <councilmember.buscaino@lacity.org>, "Mayor.helpdesk@lacity.org" <Mayor.helpdesk@lacity.org>

Sent from [Mail](#) for Windows

Ordinance CPC-2002-4864-CA.docx

13K

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 11:19 AM

To: Thomas Henry <slenry@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Date: 8/30/2022

From: Sheri L. Henry
4665 NE Voyage Ave.
Lincoln City, OR 97367
541-669-1794

To: Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles CA 90012

Planning.oildrilling@lacity.org

Office of Councilman Joe Buscaino
City of Los Angeles, District 15
638 S Beacon Street
San Pedro, CA 90713

Councilmember.buscaino@lacity.org

Mayor Eric Garcetti
City of Los Angeles
200 N. Spring Street
Los Angeles, CA 90012
Mayor.helpdesk@lacity.org

RE: Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

Dear Madam and Sirs:

As the beneficiary of a small royalty from oil and gas shares through Warren Resources, Inc. which I inherited for my grandmother, I direct this communication to voice my objection to the pending proposed Ordinance under CPC-2002-4864-CA.

I cannot begin to imagine the negative economic impact such a ban would have on myself and others similarly situated who depend upon the few dollars these royalties provide. A ban on existing wells and production is an extreme measure when a ban on future production would be possible. I cannot see the overwhelming societal interest which would justify ANY ban in these times when energy production is so crucial. I do hope calmer minds will prevail as this matter is further discussed and voted upon.

Sincerely,

Sheri L. Henry



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA2 messages

sk8er372@hotmail.com <sk8er372@hotmail.com>

Thu, Sep 1, 2022 at 2:20 PM

Reply-To: sk8er372@hotmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Alfredo F

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 3:09 PM

To: sk8er372@hotmail.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA2 messages

M.C S. <mailagent@thesoftedge.com>

Mon, Aug 29, 2022 at 5:04 PM

Reply-To: Zkor1ekim@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

M.C S.

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:07 PM

To: Zkor1ekim@aol.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the

City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Claire Hait <claire.hait@gmail.com>

Mon, Aug 29, 2022 at 6:35 PM

To: planning.oildrilling@lacity.org, councilmember.buscaino@lacity.org, mayor.helpdesk@lacity.org

Dear Ms. Torres, Council Member Buscaino and Mayor Garcetti,***We own property interests in the form of mineral RIGHTS, that we purchased and hold title to, located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.******Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.******Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.******Oil production and usage will not decrease world wide if you pass this ordinance. It is clear that you are politically motivated. Please read the well-written book APOCALYPSE NEVER.******We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.******Thank you.******Sincerely,******Claire Hait***

Oils Email <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:10 PM

To: Claire Hait <claire.hait@gmail.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

CPC-2022-4864-CA

2 messages

Tom Gould <tcgould274@gmail.com>
To: Planning.oildrilling@lacity.org

Fri, Sep 2, 2022 at 1:26 PM

We invested in the oil wells to provide long term income. We are in our eighties and this is our only addition to SocSecurity. We hope there will be a period time before shut down. Thank you.

Oils Email <planning.oildrilling@lacity.org>
To: Tom Gould <tcgould274@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 3:06 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Oil and Gas Drilling Ordinance CPC-2022-4864-CA

2 messages

Mark Holiday <markholidaypga@gmail.com>
To: planning.oildrilling@lacity.org

Tue, Aug 30, 2022 at 8:00 AM

August 30, 2022

Jennifer Torres

Department of City Planning

City of Los Angeles

We are writing in protest to the proposed ordinance that would ban oil and gas extraction in Los Angeles county. (Case # CPC-2022-4864-CA)

Our family has received a small royalty from oil extraction in LA county that has gone towards education for our children and other normal living expenses. The facility managers have been good stewards of the land and environmentally conscious and safe.

Now, the local government deems it their right to confiscate our mineral rights and take away any income the mineral rights might produce. Dictators do this around the world. Socialist governments take private property from their citizens around the globe. And now LA county is willing to join these misguided and ruthless people. Who will be next? Should LA County confiscate apartment buildings, paying the citizen owners nothing, so that homeless people may have a place to live. If LA County doesn't like the nutritional value of the food in fast food restaurants will they vote to close them down? If car dealerships don't all sell the right type of car will LA County close the dealerships?

We urge you to acknowledge this government grab of private assets, and the destructive precedent it will set, will ultimately create a country where there is no horizon for the working people of our country. What they work for the government can take on a whim whenever that whim presents itself.

We urge the city planning department to not support this proposed ordinance.

Best Regards,

Mark and Kate Holiday

Oils Email <planning.oildrilling@lacity.org>
To: Mark Holiday <markholidaypga@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Tue, Aug 30, 2022 at 12:22 PM

Hello,

Thank you for email. It was received and your response will be recorded as Public Comment. The draft ordinance, fact sheet, and more information can be found on the project webpage at <https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

A Virtual Presentation, Q&A, and Public Hearing will be held on Tuesday, August 30, 2022 from 6pm to 8:30pm. The public hearing is a formal opportunity to provide public comment on the proposed Oil and Gas Drilling Ordinance to a hearing officer. The public hearing is used to collect comments, and no decisions will be made at the time of public hearing. Public comments will inform City Planning's recommendation to the

City Planning Commission, who will hear the ordinance this fall and make a recommendation to City Council. Participants may join the public hearing online or by phone at any time between 6:45 p.m. and 8:30 p.m. to offer testimony.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA2 messages

Daniel Page <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 12:00 PM

Reply-To: vlvdan@icloud.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Daniel Page

Oils Email <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 12:09 PM

To: vlvdan@icloud.com

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Stop policies that shut down oil & gas production: CPC-2022-4864-CA4 messages

Cheryl griffing <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 3:56 PM

Reply-To: cher_griff@yahoo.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Cheryl griffing

Memoree Joelle <mailagent@thesoftedge.com>

Fri, Sep 2, 2022 at 4:34 PM

Reply-To: Memoree@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Memoree Joelle

Oils Email <planning.oildrilling@lacity.org>
To: cher_griff@yahoo.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 5:15 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Memoree@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 5:16 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Comments on Case CPC-2022-4864-CA, Ban on oil and gas drilling

2 messages

'Warren Kourt' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 6:58 AM

Reply-To: Warren Kourt <wpkourt@aol.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: "kkpande@stanford.edu" <kkpande@stanford.edu>, "ehazard57@yahoo.com" <ehazard57@yahoo.com>,

"walker@evansandwalker.com" <walker@evansandwalker.com>, "rjmanda_2000@yahoo.com"

<rjmanda_2000@yahoo.com>, "rasears@stanford.edu" <rasears@stanford.edu>, "rock@cipa.org" <rock@cipa.org>,

"erenwick@hanmor.com" <erenwick@hanmor.com>

To Whom it may concern: Please see attached letter to be included in public comments about the above reference Case.

Thank you,

Warren K. Kourt

**LAdrilling ban- commentsdocx.docx**

13K

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:37 AM

To: Warren Kourt <wpkourt@aol.com>

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

planning.lacity.org/about/commissions-boards-hearings.

For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]

Planning Commission
City of Los Angeles
Re: Case # CPC-2022-4864-CA
Proposed Oil and Gas Drilling Ordinance

All of the fields that would be shut-in by this Ordinance have remaining oil and gas reserves that can be recovered many years into the future. I haven't been able to analyze your "amortization study" as it has not been completed, to see the rationale for "allowing Operators to recover their investments". If these assets are taken away from the owners (Operators and Royalty Owners) the owners should be entitled to compensation for the Fair Market Value of the remaining oil and gas reserves. How do you anticipate they will be compensated by the City? Why is this different than the long standing principle of compensating owners whose property is taken under Eminent Domain?

Warren K. Kourt
Adjunct Professor
Department of Energy Resources Engineering
Stanford University

September 1, 2022



Jennifer Torres <jenny.torres@lacity.org>

Reject actions that will increase energy prices: CPC-2022-4864-CA4 messages

Delores Bacus <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 12:28 PM

Reply-To: deebacus0@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

Working Angelenos are dependent on their gas vehicles to get them to where they need to go - for work, school and daily activities. Driving up their energy costs even further is just bad policy.

Any new policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality.

Transitioning to a cleaner energy economy is important for everyone, but this shut down is not a transition. It is a sweeping action and abrupt end to local production and a daily necessity that will result in higher prices at the pump. Everyday Angelenos, still recovering from the economic devastation caused by the pandemic and battling inflation, they are the ones that will bear the burden of the inevitable increase in costs that this shutdown will cause.

Case Number: CPC-2022-4864-CA

Sincerely,

Delores Bacus

Ron Lucarelli <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 12:34 PM

Reply-To: RLucare@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

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Case Number: CPC-2022-4864-CA

Sincerely,

Ron Lucarelli

Oils Email <planning.oildrilling@lacity.org>
To: deebacus0@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:27 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: RLucare@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:28 PM

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

2 messages

LARRY@steeletech.net <LARRY@steeletech.net>

Wed, Aug 31, 2022 at 4:16 PM

Reply-To: LARRY@steeletech.net

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

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Case Number: CPC-2022-4864-CA

Sincerely,

larry parsons

Oils Email <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:34 AM

To: LARRY@steeletech.net

Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

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For more information regarding the proposed ordinance, please visit the ordinance website:

<https://planning.lacity.org/oil-and-gas-drilling-ordinance>.

Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Drilling ban proposal

2 messages

William DelHagen <delhagen1313@gmail.com>
To: planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 12:52 PM

Do not impede production of oil in LA. We need the oil and it's jobs.
William. DelHagen

Oils Email <planning.oildrilling@lacity.org>
To: William DelHagen <delhagen1313@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:28 PM

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Please reject actions that increase energy prices: CPC-2022-4864-CA

8 messages

Valerie Laux <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 3:58 PM

Reply-To: valjlaux@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

I am writing to urge you to reject any actions that shutdown local oil and gas production.

The City of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. Working families are being crushed as consumer prices rise due to inflation.

This is exactly the wrong time to increase our reliance on expensive foreign oil, yet that is precisely what the City Council is accomplishing by shutting down local oil and gas production. This shutdown will force the importation of more expensive foreign oil and drive up our energy price even more. This will hit disadvantaged and working Angelenos the hardest.

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Case Number: CPC-2022-4864-CA

Sincerely,

Valerie Laux

Herb Johnston <mailagent@thesoftedge.com>

Wed, Aug 31, 2022 at 8:16 PM

Reply-To: calvary7@protonmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

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Case Number: CPC-2022-4864-CA

Sincerely,

Herb Johnston

Eduardo Palconit <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 6:36 AM

Reply-To: epedong1@gmail.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

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Case Number: CPC-2022-4864-CA

Sincerely,

Eduardo Palconit

Celia Williams <mailagent@thesoftedge.com>

Thu, Sep 1, 2022 at 8:12 AM

Reply-To: Cwilli7269@aol.com

To: planning.oildrilling@lacity.org

Dear Department of City Planning:

Dear Los Angeles City Council President Martinez and Councilmembers:

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Case Number: CPC-2022-4864-CA

Sincerely,

Celia Williams

Oils Email <planning.oildrilling@lacity.org>
To: valjlaux@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:39 AM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: calvary7@protonmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:40 AM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: epedong1@gmail.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:40 AM

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Thank you.

[Quoted text hidden]

Oils Email <planning.oildrilling@lacity.org>
To: Cwilli7269@aol.com
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 10:40 AM

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Thank you.

[Quoted text hidden]



Jennifer Torres <jenny.torres@lacity.org>

Re: City Planning Case CPC-2022-4864-CA, Proposed Oil and Gas Drilling Ordinance, NARO-California Opposition Letter-Public Comment

2 messages

'Edward S. Hazard' via Planning Oil Drilling <planning.oildrilling@lacity.org>

Thu, Sep 1, 2022 at 7:07 PM

Reply-To: "Edward S. Hazard" <ehazard57@yahoo.com>

To: "planning.oildrilling@lacity.org" <planning.oildrilling@lacity.org>

Cc: Ed Renwick <erenwick@hanmor.com>

Dear City of Los Angeles Planning Department,

Attached is a public comment letter being submitted by the California Chapter of the National Association of Royalty Owners (NARO-California) in opposition to the proposed Oil and Gas Drilling Ordinance. Please enter the letter into the public record.

Sincerely,

Edward S. Hazard
President, NARO-California
[2119 Verde Street](#)
[Bakersfield, CA 93304](#)

**NARO-CA letter to Los Angeles City Planning Department 9-1-2022.pdf**

206K

Oils Email <planning.oildrilling@lacity.org>

Fri, Sep 2, 2022 at 2:48 PM

To: "Edward S. Hazard" <ehazard57@yahoo.com>

Cc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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For more information regarding the proposed ordinance, please visit the ordinance website:

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Thank you.

[Quoted text hidden]



NATIONAL ASSOCIATION OF ROYALTY OWNERS – CALIFORNIA, INC.
Serving the Citizens Who Own California's Oil and Gas Resources

September 1, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 710
Los Angeles, CA 90012

Submitted via email: planning.oildrilling@lacity.org

Re: City Planning Case CPC-2022-4864-CA
Public Comment – Submitted by NARO-California

Dear City of Los Angeles Planning Department,

The California chapter of the National Association of Royalty Owners (NARO-California) advocates for the interests of the estimated 700,000 oil and gas royalty owners in California, and even more mineral owners. The difference between the two being that a mineral owner becomes a royalty owner when he leases his property to an operator. We strongly oppose the proposed ordinance.

If adopted, the proposed ordinance and amortization will adversely affect thousands of mineral/royalty owners. The property rights owned by these royalty owners are valuable assets. There is no way to equitably amortize the rights of royalty owners other than to allow their properties to be produced until the recoverable oil and gas is completely produced. Moreover, the proposed ordinance immediately destroys 100% of the mineral owners' rights. He or she will never be able to lease to an oil and gas operator.

Oil and gas can only be produced where it is found. An oil and gas field is not like a hardware store. Neither the operator nor the royalty owner can pack up their oil and gas field and move it to another location. The royalty owners' assets will have no value if the City successfully requires their oil and gas fields to be shut down. Their assets will have been **taken** from them by the City of Los Angeles. The royalty and mineral owners will be forced to take action to protect their assets. If this happens, NARO-California will stand with them, just as we did in Monterey County.

When Monterey County passed Measure Z, NARO-California filed suit together with over 80 royalty owners as named co-plaintiffs. In addition, five oil companies filed suit. Millions were spent on legal fees and costs. We won; the County lost. In its Intended Decision the Court stated that **"Measure Z would effect a facial regulatory taking of CRC's and some members of NARO's property."** The takings issue was rendered moot as the Court invalidated the majority of the provisions of Measure Z. The case is still ongoing. It is now in the California Supreme Court.

Founded in 1980, the National Association of Royalty Owners is the only national organization representing solely, and without compromise, oil and gas royalty owners' interests.

September 1, 2022
Jennifer Torres, Department of City Planning
Submitted via email: planning.oildrilling@lacity.org
Re: City Planning Case CPC-2022-4864-CA
Public Comment – Submitted by NARO-California

We are told that we must shut down oil and gas fields in California in order to reduce greenhouse gas emissions. However, the production of oil and gas in California emits a minimal amount of greenhouse gasses. The vast emissions occur when fossil fuels are used. What happens when oil and gas production in California is reduced? More oil is imported from overseas. All of that overseas oil is produced in countries where the environmental regulations are nowhere as strict as they are in California. Therefore, global greenhouse gas emissions are not reduced by shutting down California oil and gas production, instead they are increased.

We are also told that prohibiting new oil and gas wells will not reduce production. It will just prevent expansion of oil and gas production. That is simply not true. Oil and gas is a depleting asset. As existing oil and gas wells continue to produce, they produce less and less oil until they ultimately reach the point where it costs more to produce them than they produce by way of income. Thus as time goes by, they need to be reworked and new wells need to be drilled, just to keep production going.

Many of us remember waiting in long lines at gasoline stations in the 1970s during the Arab oil embargo. That happened because the United States became dependent on undependable foreign sources of oil. Taken as a whole, the United States has finally become more or less energy independent. Not so California. We import from overseas over 60% of our oil and that is because the state government and many local governments are trying to shut down oil production in this state. Today the world is facing a worldwide shortage of oil and gas. Soon or later Californians will wish we had allowed oil and gas production to flourish in California.

Legal action is a last resort. We do not take it lightly. It is something I hope we never have to do again. Please reconsider the direction in which you seem headed.

Sincerely,



Edward S. Hazard, President

Cc: Edward S. Renwick, Esq., Hanna and Morton, LLP



Jennifer Torres <jenny.torres@lacity.org>

Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

2 messages

Rick Browning <rgbrowning4@gmail.com>
To: Planning.oildrilling@lacity.org

Wed, Aug 31, 2022 at 12:33 PM

Ms. Jennifer Torres,
I would like to voice my opposition to this proposed ordinance. I am retired and the royalties I receive are vital to me.
Thank you for your consideration.
Regards,
Geri Browning
562-209-4857

Sent from my iPad

Oils Email <planning.oildrilling@lacity.org>
To: Rick Browning <rgbrowning4@gmail.com>
Bcc: Planning Oil Drilling <planning.oildrilling@lacity.org>

Wed, Aug 31, 2022 at 1:26 PM

Hello,

Thank you for your email. It was received and your response will be recorded as Public Comment. Public comments will inform City Planning's recommendation to the City Planning Commission, who will hear the ordinance and make a recommendation to the City Council. The proposed ordinance is tentatively scheduled to be before the City Planning Commission on September 22, 2022. The final City Planning Commission agenda will be posted 72 hours before the hearing date on our planning website:

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Thank you.

[Quoted text hidden]

JENNIFER TORRES CASE # CPC-2022-4864-CA

DO NOT STOP OIL AND GAS OPERATIONS IN
LA. COUNTY. IT MAKES NO SENSE AT ALL.
ANY SMART PERSON KNOWS THAT.

[Signature]

C. W. (BILL) BRASHIER

4510 Marloma Drive
Rolling Hills Estates, Ca 90274
310-375-1822.

August 21, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, Ca 90012

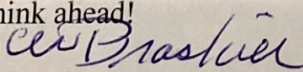
CASE: CPC-2022-4864-CA
Cessation of Oil Production

It has recently come to my attention that the /City of Los Angeles is considering a new ordinance eliminating oil production operations within the city limits. Although I might agree that drilling of new wells in a heavily occupied city is not desirable, shutting down existing production seems to be counter productive to the country as a whole. In addition, over a period of time the existing wells will become "uneconomic" and will be abandon.

If you are thinking that this action will reduce global warming, I suggest that it would only transfer emissions from where they can be controlled to where they can not. The "world" is not yet ready to eliminate fossil fuels at this point. Internal combustion engines and fossil fuel fired electric generate plants are going to be with us for some years.

Eliminating local oil production will only increase it elsewhere. Think, Permian Basin in USA or to Russia, Saudi Arabia, Venezuela. Do we want to put ourselves in a situation much like Germany finds its self today, relying on natural gas from Russia? It may be cold winter in Germany.

Think ahead!


C. W. "Bill" Brashier

**Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, Ca. 90012
(213) 978-3094**

RE: PLANNING TO BAN OIL AND GAS DRILLING !!

Oil and gas are necessary---no matter what the politics of the day are! We are all concerned with the climate from day to day. We also depend on gas and oil to function daily. We do not need more restraint on our daily needs. We also do not have to swallow our American Pride and go to other countries (friendly and enemies) to fulfill our daily need for gas and oil. YOU have the responsibility to continue or maybe limit the daily and future oil and gas drilling. As you contemplate your decision, remember socio-economics of your decision.

Sincerely:

Charles Norton

**Charles Norton--- 27520 Larchbluff Drive
Rancho Palos Verdes, Ca.
90275**

RE:

CPC-2022-4864-CA

August 24, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

RE: CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING
Virtual Presentation and Public Hearing
Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

I have been informed that the City of Los Angeles is taking steps to eliminate oil and gas in the county of Los Angeles.

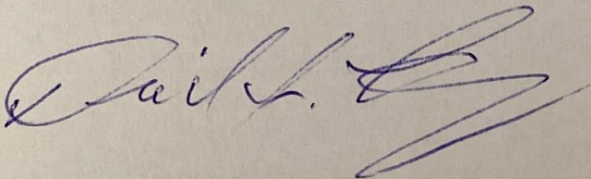
I would like to say that we and other royalty holders depend on the income from Warren Resources as part of our retirement. I am sure many others are in the same situation.

Think of all the employees that you will put out of work. Think of the taxes the county will lose.

Transition to renewables is going to take time. Oil and gas are so vital for our economy. The list is very long.

Please reconsider the ban.

Respectfully,



David L. Crosby

FROM THE DESK OF
DAVID W. SCHEPPMANN

August 25, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

Re: Case Number CPC-2022-4864-CA

Dear Ms. Torres,

As a royalty owner with Warren Resources, Inc. I felt compelled to write regarding the above Case Number coming before the City of Los Angeles. I am hoping that your department will put party politics aside and do what is beneficial to all who will be impacted by the decisions made.

The stopping of all new and existing oil and gas extraction in the City of Los Angeles would have far reaching negative effects on thousands of people. With limited green energy infrastructure presently in place, Los Angeles and the surrounding areas would suffer many losses from which there would be no recovery.

The loss of revenue stretches across industries and would have a huge impact on the State in general. The loss of production would not only cost employees a job but, adding insult to injury, would also drive up the cost at the pump for all of us. Forcing everyone to give up their vehicles, gas guzzlers and hybrids alike, to purchase expensive and ineffective electric vehicles is unfathomable- what a nightmare that would create. Is the City really considering this as reasonable for the people of Los Angeles? Consider the nightmare for air travel, train travel, car travel, farm equipment, gardening equipment, factories, cosmetics industry, etc. who all rely on petroleum products.

During the Virtual Presentations & Public Hearing please consider what is best for the people you represent. This post-COVID world is chaotic enough. Please be a mind and voice of reason.

Sincerely yours,

David W. Scheppmann

14390 INKPA ROAD
Apple, Valley, CA 92307

FIRST NATIONAL FINANCE CORPORATION

August 24, 2022

Ms. Jennifer Torres
Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

RE: Case Number CPC-2022-4864-CA

Dear Ms. Torres:

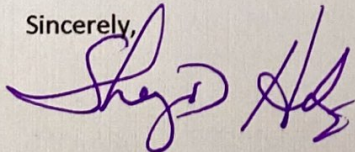
Next year we will be honoring our 100 years of continuous operation in California. Our company has been a significant contributor to the success of California as we drilled for oil, farmed agricultural products, generated opportunities for hundreds of employees and other small businesses, and provided options for low-cost housing.

Please consider the following generational impact and damage to all of California if oil and gas extraction were to be halted.

- The cessation of oil and gas extraction will be the cessation of oil and gas revenues. What calculations have been made regarding those losses? What will the new source of revenue be?
- The highly skilled labor with the highly paid wages will no longer generate taxes. This skill set will not likely transition to a new industry as any new industry will take a generation to reinvest, retool, and re-train.
- The local businesses utilized by the oil industry will be gone. Be it restaurants, convenience stores, work wear, industrial equipment, hardware and tool supplies, and mechanical repair. The lost revenues and taxes from these supporting industries will result in even more job and tax revenue losses for Los Angeles.
- The likely timeline to unwind, phase out, and transition from current oil operations is significant. There is no current industry with a proven track record that can come close to the success and benefits provided from a century of experience and technological growth.

Maybe now would be the time to allow upgrades and updates to the California oil industry. These upgrades would increase the efficiency of oil and gas recovery with the added benefit of better safety and ecological results for all residents of this great state.

Sincerely,



Sherry D. Hetz
Vice President & Assistant Secretary

August 23, 2022

Ms. Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

Re: CITY OF LOS ANGELES TO BAN OIL AND GAS DRILLING
CASE NUMBER CPC-2022-4864-CA

Councilman Buscaino, I was recently informed that the City of Los Angeles is considering banning oil and gas drilling.

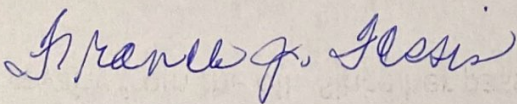
I would like to address this issue with my story. Approximately 60 years ago my father George S. Brownell and some of our neighbors were approached with an offer to do underground drilling for oil. He then would receive a royalty for that oil. At that time, we were living at 1251 Cary Ave, Wilmington, CA.

After my father passed away my mother, Wilhelmena W. Brownell, received that royalty. My mother had a Living Trust and in that trust, she named me as her Successor Trustee. As a result, at the time of her death I would start receiving a royalty from the oil. Since her passing, I have been receiving a royalty check four times a year.

I am now 77 years old and I rely on those checks to supplement my other income to live.

I hope you will consider this information and vote NO on banning oil and gas drilling.

Sincerely,



Frances J. Tassin
4333 W. Echo Lane
Glendale, AZ 85302
Email: terrytassin@cox.net

Jennifer Torres, Dept. of City Planning
200 North Spring St. Rm 701
Los Angeles, CA 90012

CPC-2022-4864-CA

Dear Ms. Torres:

I have recently been advised that you are proposing to eliminate all oil and gas extraction from the City of Los Angeles. This information has been perplexing to me and to my family.

The laws and regulations that are now in use provide for responsible and safe production in not only California, but throughout the United States. The existing regulations are enforced and provide the various companies with clear directions as to how to provide energy efficiently and safely.

It seems to me that if this cessation of production in the Los Angeles area is carried out, it would be a disaster on many levels.

First: There must be a level of confidence that the energy fields as of today are being managed in a businesslike manner with lawful, ethical, and responsible adherence to the existing rules.

Second: Simply stopping a supply of reliable energy is draconian and ill-advised. Petroleum is used in many essential ways. Health equipment, cosmetics, clothing, food storage and building materials just to name a few. Simply shutting off the spigot would have unending collateral damage.

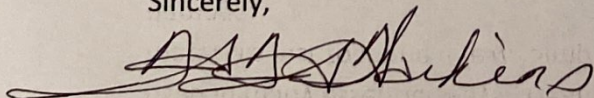
Third: The lack of income from the oil supply would have a negative effect on thousands if not millions of people who depend on investment checks for their living. We are currently in a serious financial situation in the United States and hurting individuals even more does not make sense.

Fourth: My husband and I are in our late 70s. We have counted on this royalty for part of our income for 50 years. We will be deeply impacted by the loss of this income.

Fifth: Be prudent in your actions so that they reflect well on everyone involved.

You have been given power to protect, defend and make people's lives better. Thank you in advance for using it wisely.

Sincerely,



Holly Hammerberg-Harkins

August 25, 2022

Jennifer Torres, Dept. of City Planning
200 N. Spring Street
Los Angeles, CA 90012

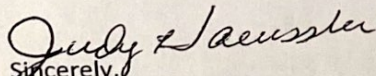
RE: Case # CPC-2022-4864-CA

Dear Jennifer,

I just received a notice from Warren Resources stating that the royalty income I have been receiving may stop. This has come as quite a shock as this is something that is owned and is producing oil that our country desperately needs. This company has always operated lawfully and ethically.

It is very scary when government can say "you cannot continue business as usual, just because we don't want you to" It's happening at the City, County, State and Federal levels. How long will it be before government takes total control like Russia. Don't laugh, it can happen, movements are happening everyday toward that very goal at every level of government.

I hope you reconsider and allow Warren Resources to continue business as usual.


Sincerely,
Judy Haeussler





MEKUSUKEY OIL COMPANY, LLC

201 S. MEKUSUKEY :- P. O. Box 816
WEWOKA, OK 74884-0816
PHONE (405) 257-5431 :- FAX (405) 257-3174

Sent Via Certified Mail 7018 2290 0000 6882 0117

August 23, 2022

Mayor Eric Garcetti
City of Los Angeles
200 N Spring Street
Los Angeles, CA 90012

RE: Proposed Oil & Gas Drilling Ordinance, CPC-2022-4864-CA

Dear Mayor Garcetti:

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

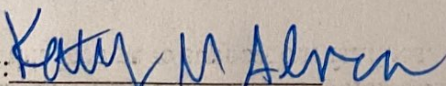
We staunchly support oil and gas development in the City of Los Angeles. The oil and gas produced in Los Angeles supports our livelihood and this energy is consumed by residents of California. We rely on this income to support our families.

Our mineral rights are vested property rights that are not yours to arbitrarily take away. If you prohibit the production of oil from our mineral rights, they will lose practically all of their value. The concept of "amortization" does not apply to our mineral rights since they have value only if someone has the right and ability to drill for and produce those minerals. The proposed ordinance does not consider or account for our interests.

Depriving us of our property rights through adoption of this ordinance is unconstitutional, and we intend to defend ourselves to the fullest protection afforded by the law if this ordinance is adopted.

We urge you to reject this ordinance and avoid incurring significant liabilities through this oppressive and legally flawed action.

Sincerely,
Mekusukey Oil Company, LLC

By: 
Name: Katy M. Alven
Title: Land Manager

cc : Jennifer Torres & Joe Buscaino



Mustang Minerals, LLC

P.O. Box 2073
Edmond, OK 73083
MustangMineralsLLC@gmail.com

Sent Via Certified Mail: 7018 2290 0000 6882 0124

August 23, 2022

Mayor Eric Garcetti
City of Los Angeles
200 N Spring Street
Los Angeles, CA 90012

RE: Proposed Oil & Gas Drilling Ordinance, CPC-2022-4864-CA

Dear Mayor Garcetti:

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

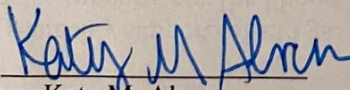
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Our mineral rights are vested property rights that are not yours to arbitrarily take away. If you prohibit the production of oil from our mineral rights, they will lose practically all of their value. The concept of "amortization" does not apply to our mineral rights since they have value only if someone has the right and ability to drill for and produce those minerals. The proposed ordinance does not consider or account for our interests.

Depriving us of our property rights through adoption of this ordinance is unconstitutional, and we intend to defend ourselves to the fullest protection afforded by the law if this ordinance is adopted.

We urge you to reject this ordinance and avoid incurring significant liabilities through this oppressive and legally flawed action.

Sincerely,
Mustang Minerals, LLC

By: 
Name: Katy M. Alven
Title: Manager

cc : Jennifer Torres & Joe Buscaino

Myrell K. Schlarb

8-23-22

Jennyfer Torres
Department of City Planning

CASE NUMBER: CDC-202-4864-CA.

I HAVE BEEN NOTIFIED BY THE
GATHERING COMPANY, WARREN RESOURCES,
INC. OF ADDISON, TEXAS, THAT THE
CITY OF LOS ANGELES WILL ELIMINATE
ALL GAS AND OIL OPERATIONS. I AM A
ROYALTY RECIPIENT AND I AM VERY
CONCERNED ABOUT MY LOSS OF INCOME
FROM ONE OF THESE WELLS. DUE MY
ROYALTY CHECK TO SUPPLEMENT MY
SOCIAL SECURITY INCOME - I AM 85
YEARS OLD ON A FIXED INCOME. WHAT
I WANT TO KNOW IS - WHO WILL
REPLACE THE INCOME I MIGHT
RECEIVE IN THE FUTURE FROM A
FUNCTIONING WELL? IS THERE ANY
CONSIDERATION AS TO THE IMPACT ON
ALL WHO RECEIVE THIS INCOME??

Myrell K. Schlarb

SONJA A. WHALLEY
4660 Cordoba Way
Oceanside, CA 92056
SonjaWhalley113@gmail.com
760-724-4070

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012
213-978-3094

Re: Case Number: CPC-2022-4864-CA -- A WORLD WITHOUT OIL

Dear Ms. Torres,

It is my understanding that on August 30, 2022 you are planning to vote on eliminating oil and gas operations in the County of Los Angeles.

What are your plans to replace this oil and gasoline for California homeowners and drivers? I am a senior citizen who has depended on electricity, gas and gasoline my entire life. Do I have to learn to live without these conveniences in my old age? Please tell me what are the alternatives??

As you know solar and wind is not going to cut it in the near future. The technology is not perfected yet.

Also, as a senior citizen I have been counting on the royalties from the oil drilling for covering part of my living expenses for many years. How are you planning to replace this necessary income for many homeowners in California.

Sincerely,

Sonja A. Whalley

Susan M. Anderson
49425 Rio Arenoso
La Quinta, California 92253-6401
760 546 8465

August 23, 2022

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

email: planning.oildrilling@lacity.org

Re: Case Number CPC-20220-4864-CA

We regret to inform you that the City of Los Angeles is taking rapid steps to eliminate oil and gas operations in the County of Los Angeles, Tuesday, August 30, 2022, the City will conduct a Virtual Presentation and Public Hearing to discuss phasing out oil drilling in the City by immediately banning new oil and gas extraction and requiring the cessation of all existing oil and gas operations. The ordinance, if passed, will make existing oil operation a legally nonconforming use and mandate termination of our operations. **Cessation of Production and Royalty Income is imminent;**

Unfortunately, what this means for us _ "Royalty Property Owners" is that the royalty income we have been receiving will end AT once FOR OUR OIL and GAS production ROYALTIES. How can you get involved AND TAKE AWAY OUR Natural Resources??

This started for our family since 1950 when we bought out home and we retained and still have the Quit Claim Deed and the parcel in force to this day.

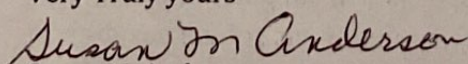
This is an income this family has depended on for over 70 years. The world depends on natural oil and gas....as we surely have been aware of lately..... these natural sources are needed just as water, milk, fruit, etal vegetables, etc.. We depend on having all of that. The income from the royalties are not huge, but now they are very much depended on for me and many, many others. I am the only family person living in my family .

These huge industries just think they can do much of what is best for them rather than thinking of the other side It would bring you more money and not to have to pay all of the many, many parcel owners of the property that give you the oil "LIKE US" but you would still steal all of this oil royalty away....from many families.... How can you just think you can steal property that I have a Deed on the property I OWN for many many years ? How do you think you can do this to all the others that HOLD secured DEED on their own property they have owned for many many years !!

This is not right, This is very wrong and it should not be stopped. I believe all of the other Deed owners will also have this very same type of negative attitude that I have.

Very Truly yours

1 of 2


Susan M. Anderson

Also Sent to RE: CPC -202204864-ca

Jennifer Torres, Department of City Planning Planning.oildrilling@lacity.com
200 North Spring Street, Room 701
Los Angeles, California 90012

Mayor Eric Garcetti
City of Los Angeles
Los Angeles, CA 90012 Mayor.helpdesk@lacity.org

Office of Councilman Joe Buscaino
City of Los Angeles, District 15
638 S Beacon street
San Pedro, CA 90703 councilmember.buscaino@lacity.org

RE: CPC -202204864-ca

End

2 of 2

August 23, 2002

Jennifer Torres, Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

RE: City of Los Angeles to Ban Oil and Gas Drilling
Proposed Oil and Gas Drilling Ordinance, CPC-2022-4864-CA

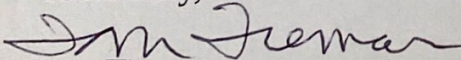
Dear Ms. Torres,

I am writing to voice my objection to passage of the above referenced ordinance which understandably will cause the cessation of production and oil royalty income, not only to myself and family personally, but to thousands of other tax paying citizens, not only in Los Angeles County but the State of California and beyond. If this ordinance passed it would be an act of inverse condemnation without due compensation. The City of Los Angeles would be depriving citizens of their rightful ownership.

I am 80 years old and remember as a young boy riding by bicycle from my home in Cheviot Hills to the oil fields in the Baldwin Hills. Oil and drilling have existed in Los Angeles County probably over 200 years. My father developed properties in the Wilmington area for many years spending thousands of dollars complying with requirements and regulations imposed by the Redevelopment Agency in order to sell properties to Union Ice.

Again, I employ your NO vote for this ordinance.

Yours truly,



Tom Tieman
2563 Pacer Street
Auburn, CA ;9;5603

August 23, 2022

Jennifer Torres, Dept. of City Planning
200 N. Spring St., Rm 701
Los Angeles, CA. 90012

Submitted by a concerned
Warren Resources Client

Re: City of Los Angeles to ban oil and gas drilling
CPC-2022-4864-CA

This correspondence is in regard to the current consideration by the City of Los Angeles to ban oil and gas drilling.

We have already experienced the tremendous damage done by the Biden Administration's reckless on-going decisions to carelessly shut down energy production without supplying alternative sources. Since reliable alternatives do not currently exist, the predictable damage resulting from these policies appears to be deliberate. Dangerously deliberate - as energy costs and the associated resulting inflation has soared. Working class people you profess to represent are hurting.

My family, for generations, have been from the Harbor/Wilmington area. Many are in a total panic for fear they will lose their **very modest legally guaranteed** oil royalties if drilling is stopped. Does anyone among the political elite relate to these people's fears? Not likely - as those receiving guaranteed government paychecks such as yourself are not threatened, as are we, with what is essentially theft of their personal property due to a purely symbolic and reckless political stunt.

Oil and gas drilling in Los Angeles County has been conducted in a safe and responsible manner for many decades. Halting future drilling will dramatically hurt the economy, energy industry employees and the citizens of California who already pay the highest taxes in the nation. As we approach the winter months with energy expenses currently at record levels, we implore you to reconsider this very reckless political move.

Without adequate energy, economies fail and innocent people are harmed. We are on that self-induced precipice. Thus, if oil and gas drilling is halted by Los Angeles County, we believe that this action constitutes politically motivated theft of our legal property rights and we will pursue taking legal action for the damages incurred.

Please - Do the right thing for the people of California. DO NOT BAN OIL AND GAS DRILLING.

August 27, 2022

Jennifer Torres, Dept. of City Planning

200 North Spring Street, Room 701

Los Angeles, CA 90012

Dear Sirs,

We own property interests in the form of mineral rights located within the City of Los Angeles. **We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.**

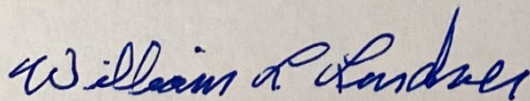
Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities to many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this wrong-headed approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Thank you.

Sincerely,



William L. Lindner
2225 Via Acalones
Palos Verdes Estates, CA 90274
310-373-2086
williamlindner@verizon.net

Jonathan Leavitt
14 Prospect Avenue
San Anselmo, CA 94960

August 26, 2022

Ms. Jennifer Torres
Department of City Planning
200 North Spring Street, Room 701
Los Angeles, CA 90012

Dear Ms. Torres:

We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to **oppose** the proposed Oil & Gas Drilling Ordinance **CPC-2022-4864-CA** banning new oil and gas extraction and implementing "amortization" of our vested property interest.

Our community has relied on the industry for generations. In LA alone, the oil and gas industry supports more than 8,000 good paying jobs. The industry is an extremely important source of blue-collar jobs, providing opportunities for many with only a high school diploma or less.

Additionally, oil and gas development here in Los Angeles and California is done cleaner and with more oversight than anywhere in the world. If oil and gas production is halted in Los Angeles, that will increase demand from international sources that do not have the same high environmental standards as we do locally.

We all care about our community, our neighborhoods, and our livelihood. We urge you to reject this dangerous approach and instead work with the families, workers and neighborhoods that rely on this industry to help provide for our families.

Sincerely,



Jonathan Leavitt

August 30, 2022

Department of City Planning
200 North Spring St., Room 701
Los Angeles, CA 90012

Re: Ban of oil and gas drilling,
Case Number CPC-2022-4864-CA

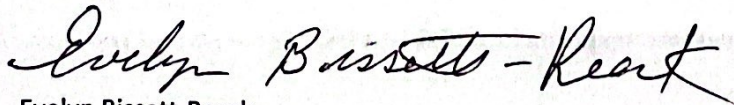
Attention: Jennifer Torres

I strongly object to the ban on oil and gas drilling. The public demand for transportation, agriculture, and strategic reserves will remain for many years.

Ignoring the economic and security issues due to no suitable replacement energy source, the cessation of oil and gas operations by Warren Resources betrays the investment my family made in LA property. The royalty income I receive is an important part of my retirement plan.

I would very much appreciate your reconsidering this matter, and postponing the ban on oil and gas drilling until plans are made for needed energy resources.

Sincerely,


Evelyn Bissett-Reark

REF: Case Number: CPC-2022-4864-CA

Dear Jennifer Torres,

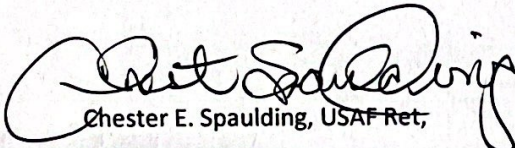
We own property interests in the form of mineral rights located within the City of Los Angeles. We are writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While we understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our family has relied on for generations. The proposed ordinance does not consider our interests – or the fact we rely on this vested property to help feed our families and put food on the table.

We urge you to reject this ordinance and work with our families to find a more balanced approach.

Sincerely,



Chester E. Spaulding, USAF Ret,

Chester.e.spaulding@gmail.com

226 Rolling Hill Drive

Daphne, AL 36526

August 26, 2022

Case Number: CPC-2022-4864-CA

Department of City Planning

200 North Spring Street Room 701

Los Angeles, CA 90012

Dear Ms. Torres,

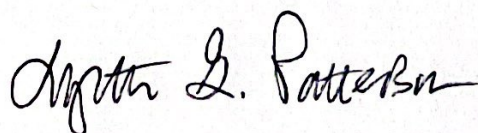
I own property interests in the form of mineral rights located within the City of Los Angeles. I am writing to oppose the proposed Oil & Gas Drilling Ordinance CPC-2022-4864-CA banning new oil and gas extraction and implementing "amortization" of our vested property interest.

While I understand the goals and objective of the Council regarding emissions and climate change, oil and gas development in the City of Los Angeles is important to our local economy. The industry provides essential jobs and millions in state and tax revenue, and the oil and gas produced in Los Angeles must follow strict safety and labor standards not mandated in other oil and gas producing countries.

Our mineral rights are our vested property rights that our families have relied on for generations. The proposed ordinance does not consider our interests – or the fact that we rely on this vested property to help feed our families, put food on the table, and purchase much needed medications.

I urge you to reject this ordinance and work with our families to find a more balanced and equitable approach.

Respectfully Submitted by:

A handwritten signature in black ink, appearing to read "Lynette G. Patterson". The signature is fluid and cursive, with the first name being the most prominent.

Lynette G. Patterson

August 26, 2022

Ms. Jones
This regards Case Number CPC-2022-4864-CA

The city would ban new oil and gas extraction and require the cessation of existing oil and gas operations?? You can just put a whole historic industry out of business with a snap of your fingers?? That doesn't seem legal, among other things.

I inherited oil leases with two different Long Beach area companies from my father-who purchased them in 1944. I am 75 years old and benefit greatly from many years of income from these leases. So-you can just sign on the dotted line and say bingo, that income is forever gone for me?? That doesn't seem fair, among other things.

Over the years I have spoken with employees of these companies and it would seem that they are established business adhering to the regulations they are subject to plus adjust to changing times. From a legal standpoint I can see where NEW businesses engaging in certain types of activities could be denied the licenses or permission to set up NEW operations but established businesses should be "grandfathered in" and allowed to proceed as always.

If the City of Los Angeles can change their mind about what is acceptable and put existing companies out of business-something is wrong- many would call that government over reach and it does sound like too much power in the hands of the few.

If the focus of this elimination of gas and oil extraction in the County relates to carbon footprint, global warming etc. please bear in mind that I am an environmentalist and that I believe in the value of gas and oil production as part of ENERGY SELF SUFFICIENCY for America.

What are oil and gas good for? Combustion engine automobiles. The country seems to be moving toward the idea that gas powered cars should be phased out and replaced by electric vehicles. This is a flawed scenario. Lithium for electric car batteries is hardly a benign, environmentally friendly commodity. Wars will be fought over it. What is going to happen is that expensive electric vehicles will be out of reach for the average person and gas production will be phased out so the average person won't be able to afford to drive combustion engine vehicles either.

WE NEED THE GAS AND OIL that comes from the local So Cal operations you would eliminate.

To sum it up-

1) It isn't right to shut down by government decree a longstanding local industry-legislating away a whole industry??? Come on!

2) it isn't right to deprive lease holders of those businesses of income they depend on and have depended on for decades-people like me!

3) in the Big Picture, America needs the gas and oil resulting from those businesses for energy self sufficiency and to keep gas affordable for those millions who can't afford expensive electric vehicles but are dependent on having a car.

Thank you for reading and considering this...

*Stephanie
Preninger*



Patricia A. Marra
3107 Mayfair Dr.
San Antonio, TX 78217

August 23, 2022

Jennifer Torres Dep. Of City Planning
200 North Spring Street Rm 701
Los Angeles, CA 90012

Office of Councilman Joe Buscaino
City of Los Angeles, Dist. 15
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Mayor Eric Garcetti
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Ref: City of Los Angeles to ban oil and gas drilling CPC 20224864 CA

Dear to whom it may concern:

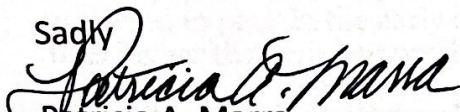
This letter came to me in to short of time. Not everyone has time , to respond in such short of time. It just came in today.

I was born in Bixby Knolls, I lived my teens in Wilmington, with my sister and family. My Father Jack was president of the Optimist Club for many years, and my Mother and Father owned many business there. I can't believe that you are allowing this government/ to banning new oil and gas extractions. Do you not realize that it is not only because we are having world wide weather along with the some questionable problem's arising now for the planet. However, if we have problems now with all that we might lose in the Atmosphere coverage, gas and oil is still there. If no electricity, what happens with cars and house and everything electric. Think we will be homes of solar shingles, why not on the top of electric cars. This is a travesty to even think that this is right. Right now Biden is pushing electric, wait, he will not be president again. We need someone who will get our country back thinking right. Don't let his shame with these electric cars. Who can afford, them, electric hook up come on, don't let money people change your minds, do what is right. I put a copy of Forbes in the file. They say baloney. Gas and Oil are here to stay.

If you really love our country and our people then do the right thing.

I hope this and others have taken the time on sending our opinions.

Sadly


Patricia A. Marra



Although natural gas is projected to be the fastest-growing fossil fuel over the next two decades, the global oil market won't likely be far behind.

Multiple organizations project that global oil consumption will grow by an annual average of over 1 million barrels per day (BPD) through 2030. However, natural gas is projected to grow at an even faster rate, so the oil's global energy market share will decline.

In the 2030s, oil demand is finally forecast to begin slowing as a result of fuel economy gains and competition from electric vehicles. Oil demand is projected to peak in the early 2030s, but it will do so at a level 10-15 million BPD higher than current production.

That means that new oil supplies will have to be continually added to account for both new demand and declines in existing fields. This means the upstream oil industry will remain a large, viable industry for the foreseeable future. It is not - as some have projected - on its last legs.

Most new global oil supplies over the next decade are projected to come from the U.S., Canada, and Brazil. These new supplies are projected to be profitable at below \$100/barrel, and that will help moderate oil price spikes.

The viability of the oil industry will remain even when oil demand plateaus in the 2030s, due to the large sums of investment and activity to maintain oil

production levels as existing fields deplete. Oil will no longer be a growth industry in the 2040s, but the industry will remain a vital part of the global energy system.

Oil's staying power is a result of its high energy density, convenience, availability, and existing infrastructure (both personal transportation and oil transport infrastructure).

But this price premium will ultimately be oil's downfall, as it speeds the adoption of alternatives to oil such as electric vehicles.