

Communication from Public

Name: Mark Morris, SoCal350 Climate Action

Date Submitted: 10/06/2022 10:25 AM

Council File No: 17-0447-S2

Comments for Public Posting: I support the draft ordinance that prohibits any future oil drilling and phases out existing oil drilling sites as non-conforming land uses and urging the Planning Commission to move it forward to the City Council. I live/work in the South LA area, a community that has been greatly impacted by oil and gas extraction, such as the extraction activities conducted by AllenCo. I have seen how oil drilling has impacted the lives and the health of our community, and this ordinance is a good first step in protecting frontline communities like mine. I also ask that the City strengthen the ordinance by 1) defining the potential threats to public health and the environment, 2) prohibiting all acid treatment work during the phase-out period, and 3) establishing swift timelines and standards for oil and gas operators to plug and abandon wells once they cease operating. These are detailed further in the comment letter, submitted by the STAND-LA Coalition to the City Planning Commission on September 21st. Overall, I ask that the City Planning Commission passes the draft ordinance that prohibits any future oil drilling and phases out existing oil drilling sites as non-conforming land uses. Further, the City must ensure that the ordinance is as strong as possible, centers public health and reduces health harms as communities wait for oil and gas drilling activities to end. As we approach a full phase-out of oil drilling in Los Angeles, the City must not only stop the activities that have harmed communities for generations. The City must also ensure that future harm is prevented. That begins with making these changes. Separate from this ordinance, we also strongly urge the City to continue thinking of ways to ensure a full just transition around healing the land and impacted frontline communities so that it does not leave behind a legacy of contamination when thinking about potential future community-serving health land use on these sites. Lastly, we must not forget workers. We are eager to work with the City and other partners to create a meaningful just transition plan that ensures workers are supported in transitioning out of oil and gas into safe, family-supporting jobs and careers in other industries.

Communication from Public

Name: Trent Rosenlieb
Date Submitted: 10/06/2022 11:03 AM
Council File No: 17-0447-S2
Comments for Public Posting: Please see attached file.



California Independent Petroleum Association

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October 6, 2022

LA City Energy, Climate Change, Environmental Justice & River Committee
200 North Spring Street, Room 1010
Los Angeles, CA 90012
Via email

Re: LA City Oil and Gas Ordinance - 17-0447-S2

Dear Committee Members:

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 and public health will not improve.

Hundreds 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 \$108,000. 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 military 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 as one of 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 75% 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, about 18% of California's imports, 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 Planning and Zoning Departments 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 impact only 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 Petroleum Administrator estimated that the cost of litigation and compensation for taking the minerals could approach \$100 Billion. 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 hundreds and reduce revenues for the City. The result will be very minor 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 blue ink that reads "Trent R. Rosenlieb". The signature is written in a cursive style with a large initial 'T' and 'R'.

Trent R. Rosenlieb
CIPA LA Basing Organizer