



DEPARTMENT OF CITY PLANNING RECOMMENDATION REPORT

CITY PLANNING COMMISSION

DATE:	December 11, 2025	CASE NO.:	CPC-2025-2884-CA
TIME:	After 8:30 AM*	CEQA NO.:	ENV-2025-2885-MND
PLACE:	Los Angeles City Hall John Ferraro Council Chamber, 3rd Floor, Room 340 200 North Spring Street Los Angeles, CA 90012	COUNCIL FILE NO.:	17-0447-S2
	And via Teleconference. Information 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	LOCATION:	Citywide
		COUNCIL DISTRICTS:	All
		PLAN AREAS:	All

PUBLIC HEARING: Required

SUMMARY:

The proposed Oil and Gas Drilling Ordinance (Oil Ordinance) consistent with Assembly Bill (AB) 3233 would amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC. In summary, the proposed ordinance would prohibit new oil and gas drilling citywide; declare all existing oil and gas activities a nonconforming use in all zones; mandate the cessation of all nonconforming oil and gas operations within a 20-year period; disallow the maintenance, expansion, re-drilling, deepening, or intensification of existing extraction activities and wells in all zones (except for specific, limited Well Servicing); and create a separate zoning review process to permit these activities only to prevent, respond to, or cease credible threats to public health, safety, or the environment.

RECOMMENDED ACTIONS:

1. **Recommend** that the City Council **adopt** the Mitigated Negative Declaration pursuant to CEQA Guidelines Section 15074(b); **Consider** the whole of the administrative record to date, including the Mitigated Negative Declaration, No. ENV-2025-2885-MND (“Mitigated Negative Declaration”), and all comments received, with the imposition of mitigation measures; **Find** 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 Zoning Code Amendment Ordinance pursuant to Section 13B.1.3.D.3 of Chapter 1A of the Los Angeles Municipal Code (LAMC);
3. **Adopt** the Staff Recommendation Report as the Commission’s report on the subject; and
4. **Adopt** the attached Findings.

VINCENT P. BERTONI, AICP
Director of Planning



Hagu Solomon-Cary, AICP, Principal City
Planner



Lilian Rubio, City Planner

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, Room 272, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (Phone No. 213-978-1299) or emailed to cpc@lacity.org. While all written communications are given to the Commission for consideration, the initial packets are sent to Commission 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 these 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 no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at (213) 978-1299.

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Ordinance Analysis

Project Summary

The proposed Oil and Gas Drilling Ordinance (“Oil Ordinance” or “Ordinance”), consistent with Assembly Bill (AB) 3233, would amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC. In summary, the proposed ordinance would prohibit new oil and gas drilling citywide; declare all existing oil and gas activities a nonconforming use in all zones; mandate the cessation of all nonconforming oil and gas operations within a 20-year period; disallow the maintenance, expansion, re-drilling, deepening, or intensification of existing extraction activities and wells in all zones (except for specific, limited Well Servicing); and create a separate zoning review process to assess activities that may be necessary to prevent, respond to, or cease credible threats to public health, safety, or the environment.

Background

Studies show that activities related to oil and gas operations have been associated with many negative health, safety, and land use impacts, especially when they occur in close proximity to sensitive uses such as homes, schools, places of worship, recreation areas, and healthcare facilities. Consistent with City and State policies on climate change, Los Angeles is introducing regulations that would phase out oil drilling and related activities to lessen the known hazards to public health, safety and the environment. This policy aims to improve the City’s overall livability while addressing long-standing injustices to frontline communities and communities of color disproportionately affected by the detrimental impacts of oil drilling.

For decades, neighborhood groups and community members have called for greater environmental protections around urban oil drilling in Los Angeles. In 2022, the Los Angeles City Council responded to these concerns by adopting Ordinance No. 187,709 to Chapter I of the LAMC, which became effective on January 18, 2023. To supplement the enforcement of Ordinance No. 187,709, the Chief Zoning Administrator issued a Zoning Administrator Interpretation (Case No. ZA-2022-8997-ZAI) on January 17, 2023, interpreting what the types of drill site activities qualify as “well maintenance.” On October 4, 2023, this ZAI was reissued, as modified by the Chief Zoning Administrator, and as adopted by the City Planning Commission, pursuant to appeal Case No. ZA-2022-8997-ZAI-1A.

On January 17, 2023, the Chief Zoning Administrator issued ZA Memo 141, establishing application and processing requirements for the Health and Safety Exception for oil and gas drill sites pursuant to LAMC Section 12.23 C.4 (amended by Oil Ordinance No. 187,709, adopted on December 2, 2022, and effective January 18, 2023).

Various parties challenged Oil Ordinance No. 187,709, the 2023 ZAI, and ZA Memo 141 in *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court Case No. 23STCP00060, and three related cases.¹ Following trial, the court ruled that Oil Ordinance No. 187,709, the 2023 ZAI, and

¹ The other three related lawsuits are: *E & B Natural Resources v. City of Los Angeles*, LASC Case No. 23STCP00070, *Native Oil Producers & Employees of California / Western States Petroleum Association v. City of*

ZA Memo No. 141 were preempted by state law, as it existed at the time. The matter was ultimately resolved by stipulation and a stipulated judgment, which required the City to rescind Oil Ordinance No. 187,709, the 2023 ZAI, and ZA Memo No. 141. Pursuant to the stipulation and stipulated judgment, on May 23, 2025, the City Council adopted Ordinance No. 188,623 to rescind Oil Ordinance No. 187,709. The rescission of Oil Ordinance No. 187,709 meant the former language in Sections 12.03, 12.10, 12.23, 12.24, and 13.01 of Chapter I of the LAMC, as they existed prior to the adoption of Oil Ordinance No. 187,709, became effective and enforceable. Ordinance No. 188,623, rescinding Oil Ordinance No. 187,709, became effective on July 16, 2025. Further, to comply with the requirements of the stipulation and stipulated judgment, the Chief Zoning Administrator jointly rescinded Case No. ZA-2022-8997-ZAI-1A and ZA Memo 141 on May 29, 2025.

On September 25, 2024, after the court issued its preemption ruling in the *Warren* litigation, Governor Newsom signed into law AB 3233, which added Section 3106.1 to the Public Resources Code, empowering local governments to enact and enforce "limitations or prohibitions related to the methods of oil and gas operations or development and the locations of oil and gas operations or development" that are more protective of public health, the climate, or the environment than those prescribed by state law and notwithstanding any other law or state approval or permit.

The Legislature's intent in passing AB 3233 is stated in the bill text: "Protecting public health, safety, and the environment is of the utmost importance to all Californians. In order to protect public health and safety, cities and counties must have the authority to regulate oil and gas operations within their jurisdictions, including operations that may otherwise be approved by the State Oil and Gas Supervisor... Empowering cities and counties to regulate, limit, or prohibit oil and gas operations in their jurisdictions will therefore enable communities to make decisions that align with their needs."

AB 3233 provides relevant context because it reflects a broader legislative trend toward recognizing and strengthening local authority over oil and gas operations. The statute signals a growing number of policies intended to regulate or restrict oil activities that pose documented harms to nearby communities.

Another notable state legislation which became effective on June 28, 2024, was Senate Bill (SB) 1137. SB 1137 was signed by Governor Newsom on September 16, 2022; however, it was temporarily paused due a potential ballot initiative that would have invalidated SB 1137. After the ballot initiative was withdrawn, SB 1137 became effective on June 28, 2024. The California Geologic Energy Management Division (CalGEM) resumed implementation of the new regulations, including a prohibition on new drilling, deepening, and rework (well maintenance) permits within 3,200-feet of sensitive receptors. SB 1137 contains language that empowers CalGEM to issue permits if oil well activity is found to be necessary to prevent or respond to a threat to public health, safety, or the environment. CalGEM determines on a case-by-case basis if a scope of work meets the criteria for such a health and safety exception. Like AB 3233, SB 1137 underscores the Legislature's recognition that oil and gas operations near sensitive receptors pose heightened risks.

Together, AB 3233 and SB 1137 illustrate a growing legislative trend toward regulating or restricting oil and gas operations that present potential health and safety risks, providing important context for the City's continued role in oil regulation.

On January 28, 2025, with Mayoral approval, the City Council instructed City Planning to begin all necessary preliminary work for a new oil ordinance. On June 3, 2025, in accordance with the stipulation and stipulated judgment from the *Warren* litigation, City Planning hosted the first stakeholder meeting to collect feedback on the proposed work program for the Oil Ordinance. On September 17, 2025, City Planning released the draft Oil Ordinance for public review and feedback. On October 1, 2025, City Planning hosted a second stakeholder meeting to provide an overview of the draft Ordinance and to acquire additional feedback and comments on the presented policy. Since the release of the draft Ordinance, there have been minor revisions to clarify text, correct typographical errors, or to include language that was omitted in the first draft of the Ordinance. The proposed Ordinance, dated November 2025, is the version that is before the City Planning Commission and to which this Recommendation Staff Report is applicable.

Proposed Ordinance

Key Provisions

The proposed Oil Ordinance, included herein as *Exhibit A*, would prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones. Specifically, the ordinance proposes to amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter I of the LAMC and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC to:

1. Prohibit new oil and gas drilling citywide;
2. Declare all existing oil and gas activities a nonconforming use in all zones;
3. Mandate the cessation of all nonconforming oil and gas operations within a 20-year period;
4. Disallow the maintenance, expansion, re-drilling, deepening, or intensification of existing extraction activities and wells in all zones (except for specific, limited Well Servicing); and
5. Create a separate zoning review process to assess activities that may be necessary to prevent, respond to, or cease credible threats to public health, safety, or the environment.

Ordinance Scope

The proposed Oil Ordinance is a citywide land use amendment that establishes a phase-out and end to fossil fuel extraction within Los Angeles's boundaries. As described below, the Ordinance's immediate scope is two-fold: (1) it sets forth a prohibition on new oil well uses and on the re-drilling or deepening of existing oil wells for the purpose of oil production; and (2) it designates all existing active and idle wells as nonconforming uses.

Prohibition

First, the Oil Ordinance prohibits all new extraction activities by amending specific chapters of the LAMC to eliminate the formation of new "O" Oil Drilling Supplemental Use Districts and revoke

the "by-right" permission for drilling even in M3-Heavy Industrial Zones (including in any Industrial Use District of Chapter 1A of the LAMC). This means that regardless of zoning, no new oil wells may be drilled, and no existing wells may be re-drilled or deepened, for the purpose of production anywhere in the city. This action directly addresses the City's commitment to mitigating environmental health risks, especially in proximity to sensitive receptors like schools and homes.

Nonconforming Status

The second aspect of the Ordinance is its declaration that all 1,864 existing active and idle wells are immediately designated as a nonconforming use. This is the key mechanism for the phase-out, triggering a maximum 20-year timeline. This timeline is not an optional deadline; rather, it dictates that all non-exempt oil and gas extraction must cease operations and terminate by the end of that timeframe, which is deliberately drawn from the established precedent in LAMC Section 12.23 C.4. Throughout this wind-down period, operations are strictly limited: they may not expand, intensify, or introduce new permanent or temporary equipment (including, but not limited to new injection wells, new storage tanks, new on-site pipelines, or microturbines) or perform well maintenance activities for the exclusive purpose of extending the life of the oil well's function, though operations must stop sooner if a well is idled or discontinued for one continuous year.

Health and Safety Exception

A critical component of the Ordinance's scope is the Health and Safety Exception. Recognizing that unexpected well issues (like methane leaks or casing failures) can pose immediate public hazards, the Ordinance allows otherwise prohibited activities—such as necessary maintenance or limited drilling—through a zoning review process if required to mitigate an urgent environmental or public safety threat. The Ordinance will provide an administrative review option and a discretionary review option for proposed oil well projects. Regulatory agency orders, such as an urgent repair notice, are eligible for the administrative review option. Preventive maintenance designed to prevent future threats to public health, safety, or the environment is subject to a separate zoning review process, including a public notice requirement, to ensure it is narrowly tailored and not used as a pretext for extending production. Finally, the scope is clearly delineated by its explicit exclusion of wells operated by public utilities regulated by the California Public Utilities Commission (CPUC).

Compliance Review

While the Ordinance does not permit the establishment of new oil drilling districts in the City, the new regulations establish a set of procedures for Compliance Review determinations for existing oil well sites within existing oil drilling districts. This process in the Ordinance can ensure that existing extraction and production operations remain in strict compliance with any legacy land use conditions encumbering the use. The Compliance Review process in the Ordinance is an accountability and monitoring mechanism to minimize nuisance and annoyance factors associated with existing oil well sites during the Ordinance's aforementioned phase out period, especially those in close proximity to sensitive uses.

Notification Requirements

The City has historically recognized the importance of public transparency when oil production activity is undertaken. The Ordinance proposes a 1,500-foot public noticing requirement ensuring that residents and occupants far beyond the immediate adjacent parcels are fully informed. The 1,500-foot public noticing requirement is triggered for any request for a Health and Safety Exception requiring Quasi-Judicial Review by the Zoning Administrator; and for any Compliance Review proceedings, including Evaluation of Non-Compliance or Nuisance Abatement/Revocation, initiated by the Zoning Administrator. This noticing requirement is greater than the standard notification radius associated with other zoning requests and recognizes the particular health risks posed by oil uses in urbanized areas. This public awareness continues to be essential for promoting preparedness and transparency, particularly within disadvantaged and frontline communities that have historically been disproportionately affected by the health and environmental risks associated with nearby oil and gas operations.

Applicability

The Ordinance applies Citywide. Its primary mechanism is designating oil and gas extraction as a prohibited land use (for new operations) and a nonconforming use (for existing operations). This means that whether a well is located in a heavy industrial M3 zone (including any Industrial Use District of Chapter 1A of the LAMC), or in an area with an established "O" Oil Drilling Supplemental Use District, the new rules apply equally, ensuring that health and safety protections are extended uniformly to all communities, including the historically overburdened neighborhoods where many of the City's drill sites are located.

The Ordinance specifically targets the upstream activities of oil and gas extraction, including, but not limited to, the actual drilling, production, and separation of hydrocarbons. It applies to all 1,864 active and idle wells in the City that are currently subject to local land use regulation. The proposed Ordinance and its land use restrictions govern the use and permissible activity of that use on both individual wells and well sites (i.e. a collection of wells, the production area, and the appurtenant equipment). Proper plugging and abandonment of the well itself is addressed by state and local safety regulations under the authority of CalGEM and LAFD, among others, not the underlying Zoning Code's prohibition on the use. The Ordinance does not apply to downstream or midstream infrastructure, such as, but not limited to, common carrier oil pipelines, service stations, refineries, and any well operated by a public utility regulated by the California Public Utilities Commission (CPUC), such as natural gas storage facilities.

The Ordinance has three main components. The first includes the immediate prohibition of all new drilling. The second component prohibits the maintenance, drilling, re-drilling, or deepening of existing oil wells and the expansion, extension, or intensification of existing oil well sites including limiting the equipment and operations. These two aspects of the proposed Ordinance would immediately be applicable upon the Ordinance's effective date. The third component is the 20-year phase out period for existing sites to cease operations. Collectively, these components aim to strictly govern every aspect of the use until its required termination. This ensures that

operators cannot extend the economic or physical life of the nonconforming use beyond the allotted phase-out period, cementing the policy's immediate and long-term impact across the entire City.

Amendment Outline: Chapters I & 1A

Chapter I of the LAMC

The proposed Ordinance touches several sections of the Planning and Zoning Chapters in order to realize the City's policy objective. The following is a high-level summary of the code amendment's respective sections proposed under the Ordinance for Chapter 1 of the LAMC:

LAMC Ch. I Sections	Description of Proposed Change
<i>Section 12.03</i>	In Section 12.03, the proposed Ordinance deletes the definition of Temporary Geological Exploratory Core Hole as this use will no longer be permitted upon the effective date of the proposed Ordinance.
<i>Section 12.20</i>	Section 12.20, specifically Subdivision 17 of Subsection A, is being deleted. The existing text that allows oil and gas wells in M3 zones "by right" will be replaced with "None". This change means that oil and gas wells will no longer be an automatically permitted use on M3 (heavy industrial)-zoned land. By removing this provision, the Ordinance is consistent in its treatment of oil wells as a nonconforming use citywide.
<i>Section 12.23</i>	<p>Section 12.23 outlines the nonconforming rights for all existing oil well sites.</p> <p>Given the nonconforming status, this section also imposes limitations for the nonconforming use, including, but not limited to, disallowing the expansion, extension, or intensification of existing extraction activities and wells in all zones.</p> <p>Most importantly, it utilizes an already established 20-year phase out period and establishes a Health and Safety Exception to provide a formal, multi-tiered process for reviewing otherwise prohibited activities on nonconforming oil well sites, but only for a legitimate safety purpose. Please see the <i>Health and Safety Exception</i> section below for more information.</p>
<i>Section 12.24</i>	Section 12.24 contains the regulating provisions for conditional use permits. The proposed Ordinance deletes Sections 12.24

	<p>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. The Ordinance would prohibit these uses.</p>
<p><i>Section 13.01</i></p>	<p>Section 13.01's primary function is to establish the core prohibitions, define critical terminology, and provide the city with an enforcement mechanism for existing neighborhood drill sites.</p> <p>Subsection A reinforces the intent of the Ordinance to prevent any <u>new</u> oil and gas districts from being established in the City. It also clarifies that while existing districts are subject to the new rules, their original conditions will remain in effect until the use is terminated, with the exception of wells operated by public utilities regulated by the California Public Utilities Commission.</p> <p>Subsection B provides definitions for key terminology used throughout the Ordinance. Most notably, the proposed Ordinance text clarifies the definitions for Oil Well and incorporates definitions for Well Maintenance and Well Servicing previously defined through zoning interpretations.</p> <p>Subsections C and D are deleted under the proposed Ordinance as that text was for determining the status of an area as urbanized or nonurbanized for the purposes of establishing a new oil drilling district, which is no longer allowed through the provisions of the proposed Ordinance.</p> <p>Subsections E and F outline the conditions that apply to existing oil drilling districts. Since no new oil drilling districts would be allowed through this proposed Ordinance, these subsections are intended to regulate the nonconforming use of existing oil and gas operations. These subsections are retained primarily for reference purposes for previously approved neighborhood drill sites in existing oil drilling districts established pursuant to LAMC Section 13.01. The various standards and conditions outlined in Subsections E and F that are imposed for different neighborhood drill sites remain valid and enforceable.</p>

	<p>Subsection G is deleted under the proposed Ordinance, as it provided a list and description of districts where oil and gas drilling was permitted, distinguishing between nonurbanized, urbanized, offshore, and LA City Oil Field areas. Since the proposed Ordinance does not allow for new oil drilling districts and makes all oil and gas activities a nonconforming use in all zones, the description of these districts is no longer necessary.</p> <p>Subsection H is replaced to reflect a Compliance Review process for existing drill sites in existing oil drilling districts. These neighborhood drill sites were approved and established under the authority of LAMC Section 13.01, and Subsection H previously authorized the drilling, deepening, and maintenance of wells in close proximity to sensitive uses. The language previously found in Subsection H has been replaced by a Compliance Review process for the Zoning Administrator to review an existing drill site's compliance with its governing land use approval. Since the Ordinance no longer permits new drill sites, Subsection H will now serve the purpose of ensuring that existing drill sites operate in strict compliance with their land use conditions of approval during the 20-year phaseout period. The process for Compliance Review requires a Notice of Public Hearing mailed to owners and occupants of all property within 1,500 feet of the exterior boundaries of the Oil Well site.</p> <p>Similarly, Subsections I and J are deleted as they dealt with the permitting, establishment, and termination of new oil drilling districts, which are now prohibited by the proposed ordinance.</p>
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Chapter 1A of the LAMC

The following is a high-level summary of the code amendments proposed for Chapter 1A of the LAMC in order to accomplish the same policy objectives, only modified to reflect the content, structure, style and formatting found in the New Zoning Code and applicable where the New Zoning is applied:

LAMC Ch.1A Sections	Description of Proposed Change
<i>Section 1.4.7</i>	The proposed Ordinance deletes Section 1.4.7 (titled "Warren E&P, Inc. v. City of Los Angeles and Oil Regulations") from the LAMC in its entirety. This section applies only to oil and gas regulations found within Chapter 1A and contains

	<p>language that referenced the prior judicial challenges against the City's initial oil and gas drilling phase-out policy. Removing this case-specific and now obsolete legal language clears the way for the implementation of any oil and gas regulations in Chapter 1A.</p>
<i>Section 5D.9.7</i>	<p>Section 5D.9.7 is amended by revising the definition of "Oil, Gas, or Hydrocarbon Well." This revision ensures the definition is consistent across the new code structure, confirming that the term encompasses not only the well or hole itself, but also includes any associated facilities such as the production areas and other appurtenant structures and equipment located on the subject property/properties. The updated definition maintains the exemption for any well operated by a public utility regulated by the CPUC. This comprehensive wording is key to the proposed Ordinance's enforcement, as it confirms that the restrictions against expansion, extension, or intensification of a nonconforming use apply to the entire physical footprint of the drill site, not just the wellbore.</p>
<i>Section 8.2.4</i>	<p>Section 8.2.4 defines the Oil Drilling Districts (O) Supplemental Use District. The amendments done in this Section, are to redefine in the "Intent" section, ensuring the prohibition of all new oil, gas, or hydrocarbon wells and managing the nonconformity and termination of existing ones. The amendments remove provisions for establishing new Oil Drilling Districts and instead focus Section 8.2.4. entirely on the existing, now nonconforming, "O" Districts. Furthermore, the revised section embeds the new Compliance Review process, granting the Zoning Administrator authority to investigate and verify that existing drill sites operate in strict adherence to their original land use conditions throughout the 20-year phase-out, ensuring no expansion, extension, or intensification occurs under the guise of an old approval.</p>
<i>Section 12.1.2</i>	<p>The proposed Ordinance adds a new Subsection E of Section 12.1.2. This newly added Section governs the application of the nonconformity provisions for oil and gas extraction. The specific change involves adding a new sentence that explicitly directs users to Section 12.5.4 for all oil and gas-related nonconformity rules, ensuring that all policies governing the nonconforming status and limitations of existing wells are</p>

	centrally located and specific only to oil and gas-related nonconforming uses.
<i>Section 12.5.4</i>	Section 12.5.4 is entirely dedicated to regulating all existing oil extraction activities and immediately declaring them a nonconforming use as of the Ordinance's effective date. It mandates the cessation of all operations within 20 years, with an earlier termination required if the well or site is idle for a continuous period of one year. Further, Section 12.5.4. imposes strict limitations, prohibiting new drilling, deepening, maintenance, or any expansion, extension, or intensification of the well site's operations or equipment. It also establishes the specific procedures and findings required for the Health and Safety Exception to address credible threats and lays out the standards to limit impacts on adjacent in compatible uses (such as removing drilling rigs and soundproofing equipment) that must be followed until the use is terminated.
<i>Section 13B.2.2</i>	The proposed Ordinance makes focused amendments to Section 13B.2.2 to ensure the procedural mechanics of the phase-out are integrated into Chapter 1A. While the primary function of Section 13B.2.2. remains setting the process for Conditional Use Permit applications, the revisions add key references to the new oil policy. Specifically, the amendments modify the language governing the Modification Procedures (Subsection H) to cross-reference the nonconforming oil sections in the new code (namely, Section 12.5.4). These updates are essential because certain Health and Safety Exception applications and required Compliance Reviews, are processed using the procedures laid out for Class 2 CUP Modifications. By ensuring Section 13B.2.2 recognizes and directs the Zoning Administrator to the specific findings and criteria of Section 12.5.4., the proposed Ordinance guarantees that all discretionary reviews for existing oil sites strictly adhere to the new prohibition against expansion and the phase-out mandate.
<i>Division 14.3</i>	The primary purpose of amending Division 14.3 is to achieve a one-to-one, non-substantive translation of Chapter I policies into Chapter 1A's distinct style and format. This involves standardizing terminology by defining and incorporating the new term "Oil, Gas, or Hydrocarbon Well" (replacing older Chapter I terms like "oil well"). Furthermore, Division 14.3 is where the definitions for "Well Maintenance" and "Well

	<p>“Servicing” are formally located. These definitions are essential for enforcement, as they legally distinguish between prohibited maintenance activities (which require external Rework Permits or SCAQMD Rule 1148.2 notification) and allowed servicing work, ensuring the entire code uniformly understands the strict operational limits imposed on nonconforming sites.</p>
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Health and Safety Exception Process

The Health and Safety Exception is a critical provision that demonstrates the Ordinance's core purpose: prioritizing public welfare and safety over the continuation of oil production. While the Ordinance strictly prohibits nearly all activities that would prolong or intensify the life of a nonconforming well, including maintenance, re-drilling, and deepening, it recognizes that certain unexpected conditions at aging oil sites can create imminent, severe risks to nearby residents or the environment. This exception provides a necessary, controlled pathway to perform emergency work, ensuring that the phase-out process does not inadvertently create new hazards. Additionally, to ensure that deferred maintenance does not evolve into an urgent or emergency threat to public health, safety, or the environment, operators may submit an application to the Zoning Administrator for preventative, limited well maintenance activities such as recasing or maintenance acidizing. Whether said work will be permitted or not is ultimately determined through a separate zoning review process.

This exception is not a process for operators to expand, extend, or intensify their use; it is intended to be a regulatory tool that may grant permission only to address a demonstrated failure or threat. It allows otherwise prohibited activities, equipment, or changes to operations exclusively to "cease a threat to public health, safety, or the environment." Operators must secure authorization through a separate zoning review process (administered by the Office of Zoning Administration) to justify the necessity and scope of the work. This procedural review guarantees City oversight and requires the operator to prove that the activity is limited to risk management, rather than standard oil production intended to maximize or extend the well's lifespan.

This exception aligns the proposed Ordinance with state regulations, providing a unified regulatory safety net. State law, under Senate Bill (SB) 1137, similarly restricts CalGEM from issuing drilling or rework permits within Health Protection Zones unless the activity is required to "prevent or to respond to a threat to public health, safety, or the environment." By incorporating a parallel local process, the City ensures that critical, hazard-mitigating work, such as but not limited to repairing a compromised casing, controlling an unstable pressure, or addressing an unpermitted gas release, can be compelled or permitted swiftly and legally, maintaining regulatory control over sites until their final, required abandonment.

Compliance Review Process

The proposed Ordinance restructures Section 13.01 of Chapter I (“O” Oil Drilling Districts) by shifting its regulatory purpose from enabling and establishing development of oil drilling to overseeing mandatory cessation. Subsection H, previously provided the authority for the drilling, deepening, and maintenance of wells in existing oil drilling districts, often in close proximity to sensitive land uses. Since the proposed Ordinance prohibits all new drilling, the original text of Subsection H is entirely replaced by a Compliance Review process. The Compliance Review empowers the Zoning Administrator to investigate and verify that existing nonconforming drill sites, which were previously established, operate in strict compliance with their original land use conditions of approval throughout the 20-year phase-out period. The proposed Ordinance ensures the terminal nature of the nonconforming use by precluding operators from using this Compliance Review process to request any modification or extension of their original conditions of approval. The proposed Ordinance reflects these regulations of Subsection H of Section 13.01 of Chapter I of the LAMC in Section 8.2.4. of Chapter 1A of the LAMC.

While the Compliance Review is limited to assessing compliance with a well site’s existing approvals, the Health and Safety Exception is the only procedural avenue through which an operator can request permission to perform otherwise prohibited activities. This exception cannot be used to modify or extend the land use approval’s conditions or duration. As indicated in the ***Health and Safety Exception section*** above, its strict purpose is only to prevent, respond to, or cease a threat to public health, safety, or the environment. Separating the general compliance review of an existing well site use from the review process of any exception, the proposed Ordinance ensures that the integrity of the 20-year phase-out period remains, preventing operators from using the compliance review process as an opportunity to request an extension or modification to their nonconforming use beyond the narrowly defined Health and Safety criteria.

Existing Uses and Operations during Phase-out Period

Under the proposed Ordinance, any existing oil and gas well site use and extraction operations within the City are designated as legally nonconforming uses, subject to a 20-year phase-out timeline. This 20-year period was prescribed by Ordinance No. 99,923 in 1952 within the existing nonconforming use section of the LAMC (Section 12.23 C.4). As such, the proposed Ordinance is utilizing a pre-existing timeframe that is well established and specific to the use of oil and gas within the City’s Zoning Code. Existing oil and gas extraction activities and operations must cease prior to, or no later than, the conclusion of the 20-year timeline. However, the end date may be accelerated if the use is discontinued sooner, such as if an oil well or its site operations are abandoned, discontinued, or idled for a continuous period of one year, the use is immediately deemed terminated and ineligible for re-establishment.

During this phase-out period, well sites are anticipated to continue operating and undergo routine operations, including general Well Servicing (e.g., pump replacement or pipe repair) and Well Maintenance (i.e., well re-casing or maintenance acidization), similar to historical and existing

practices. However, all existing activities must comply with the proposed regulation against expansion which explicitly prohibits new drilling, maintenance, redrilling, and deepening. In addition, the proposed Ordinance does not allow for the expansion, intensification, or the introduction of new equipment or temporary equipment (including, but not limited to new injection wells, new storage tanks, new on-site pipelines, or microturbines) beyond previously permitted limits or through a separate zoning review processes for the purpose of protecting public health, safety, or the environment. This ensures that while the City mandates cessation, it retains the flexibility to enforce or permit critical, safety-focused interventions. Once the operations permanently cease, the plugging and abandonment process is mandated by existing state and federal regulations; however, the proposed Ordinance itself does not introduce new regulations concerning the timing of the abandonment process, focusing instead on the phase-out period of the underlying land use.

New Zoning Code

The New Zoning Code (Chapter 1A) already includes policy and provisions that were integrated during the effective period of Oil Ordinance No. 187,709. The policy intent and provisions of Chapter I were translated into Chapter 1A on June 18, 2025, under CF 22-0617². As such, oil and gas is comprehensively structured across several key Articles in Chapter 1A: Article 1 (Introductory Provisions), Article 5 (Use), Article 8 (Specific Plans, Supplemental & Special Districts), Article 12 (Nonconformities), and Article 14 (General Rules).

Article 1 (Introductory Provisions)

Given the adoption timeline of Chapter 1A of the LAMC and legal challenges at the time relative to Ord. 187,709, Article 1 (Introductory Provisions) of Chapter 1A includes Section 1.4.7, which makes the entire oil and gas policy within Chapter 1A ineffective until amended. As such, the proposed Ordinance deletes this section in its entirety to affirm and implement any oil and gas provisions within other Articles of Chapter 1A.

Article 5 (Use)

Article 5 (Use) establishes Use Districts, Use Standards, and Use Definitions in order to regulate activities on a lot. Article 5 includes a use category for Oil, Gas, or Hydrocarbon Well and defines the use in Section 5D.9.7. In addition and to ensure that no oil, gas, or hydrocarbon wells are allowed in any zone and that existing wells may not be maintained or deepened, unless there is a related environmental or public health and safety threat, the Use tables in Article 5 ensure that all use permissions in all districts include a new callout use “Oil, Gas, or Hydrocarbon Well” assigned as “--” (Use Not Permitted) in all districts. The proposed Ordinance amends the definition in Section 5D.9.7 to ensure alignment with current policy intent.

² <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=22-0617>; and https://cityclerk.lacity.org/online/docs/2022/22-0617_misc_1_11-6-24.pdf

Article 8 (Specific Plans, Supplemental & Special Districts)

Article 8 (Specific Plans, Supplemental & Special Districts) establishes unique zone designations that serve, where applied, in order to respond to unique conditions that may not lend themselves to the regulations established by Chapter 1A. The current language in Article 8 mirrors the language that was effectuated by the rescinded Oil Ordinance No. 187,709. Due to the new proposed Ordinance, new amendments to Article 8 are warranted for consistency with the proposed Ordinance's prohibition on establishing new districts and to address parallel amendments proposed as part of this Ordinance to Section 13.01 of Chapter I of the LAMC. To see a more detailed description of the proposed amendments to Section 8.2.4 of Article 8, please refer to the **Chapter 1A of the LAMC section** above.

Article 12 (Nonconformities)

Article 12 (Nonconformities) provides relief from the requirements of Chapter 1A for existing lots, buildings, structures, and uses that conformed to the zoning regulations, if any, at the time they were lawfully established but do not conform to current district standards or use permissions. Article 12 currently includes a section about nonconforming oil, gas, or hydrocarbon wells and a section about the 20-year phase out period which places limits on allowed maintenance, drilling, re-drilling, or deepening, 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. As such, this section would have activated the existing 20-year phase out regulation intended in the original and now rescinded Oil Ordinance No. 187,709 and would have required that any oil, gas, or hydrocarbon well be terminated if it is abandoned or discontinued for a continuous period of one year. As such, the proposed Ordinance includes amendments to this section in order to align with current intent and policy. Section 12.5.4 continues to be the place in Chapter 1A of the LAMC where the nonconforming provisions for oil, gas, or hydrocarbon well uses are codified. This section continues to declare all existing oil extraction sites a nonconforming use and imposes the 20-year cessation period. Further, it details the operational limitations: prohibiting new drilling, deepening, or expanding the well site, and mandating termination if a well is abandoned or idled for a continuous year. To complete this integration, the proposed Ordinance also amends Section 12.1.2.E to direct users to Section 12.5.4 for all oil and gas-related nonconformity rules, ensuring that all policies governing the mandatory termination of existing wells are centrally located within the most appropriate Article of Chapter 1A.

Article 14 (General Rules)

Article 14 (General Rules) houses glossary terms with specific meaning in the Chapter 1A and also includes general rules that apply to development. Division 14.3 of Article 14 currently includes terms and definitions for those that were defined in Section 13.01 of Chapter I during the effective period of the now rescinded Oil Ordinance No. 187,709. The intent of amending Article 14 remains the same which is to ensure all terminology related

to oil and gas is clearly and consistently defined within Chapter 1A. As such, the proposed Ordinance's amendments include updating and adding terms such as "Oil Well Class 1 or A," which is redefined to point to the broader category "Oil, Gas, or Hydrocarbon Well". Further, Division 14.3 of Article 14 incorporates definitions for "Well Maintenance" and "Well Servicing", distinguishing permitted servicing work from prohibited maintenance activities. These amendments standardize the language throughout Chapter 1A, ensuring the definitions align with the strict limitations and exceptions established for the nonconforming uses.

Article 13 (Administration)

In addition to the Articles above, the proposed Ordinance amends Article 13 (Administration) of Chapter 1A. Article 13 establishes the complete framework for review, application, approval, and appeal processes for various discretionary actions related to zoning. Article 13 acts as the procedural blueprint for how decision makers within the Department of City Planning such as the Zoning Administrator execute their authority. While the proposed Ordinance does not alter the purpose of Article 13, it amends Subsection H (Modification Procedures) of Section 13B.2.2 (Class 2 Conditional Use Permit), to ensure that the new nonconforming oil policies are fully integrated into existing discretionary processes. These amendments are needed because they define the procedural steps (i.e., required public hearing notices and the applicable findings) used for evaluating applications for the Health and Safety Exception and conducting the mandatory Compliance Review of existing nonconforming drill sites.

As indicated in the **Chapter 1A of the LAMC section** above, the proposed Ordinance includes amendments to provisions in Chapter 1A to continue alignment and consistency with those amendments proposed to Chapter I of the LAMC.

Public Participation

The Department of City Planning hosted two stakeholder meetings to provide an overview of the proposed policy, walk-through the proposed Ordinance, and allow for public feedback and comments. The first stakeholder meeting took place on June 3, 2025, to provide an overview of the proposed work program. Approximately 140 participants attended this meeting. The second stakeholder meeting was held on October 1, 2025, to go over the proposed Ordinance. Approximately 56 participants attended this second meeting. In addition to the Stakeholder Meetings, the City provided electronic communications to indicate where and how to submit public comments. A total of 102 emails in support of the adoption of the proposed Ordinance and 2 emails requesting to be included as an interested party were received between June 17, 2025 to September 23, 2025. A total of 7 emails in support of the adoption of the proposed Ordinance, 2 emails in opposition of the proposed Ordinance, and one request to be included as an interested party were received between October 1, 2025 to October 9, 2025.

Stakeholder Meetings

First Stakeholder Meeting - June 3, 2025

During the public comment portion of the First Stakeholder Meeting for the City of Los Angeles' proposed Oil Ordinance, a total of 32 public comments were received. Thirty comments were generally in favor of the proposed Ordinance to prohibit oil and gas drilling citywide. Speakers were primarily residents, community organizers, and representatives from environmental justice and public health groups such as the STAND L.A. Coalition (e.g., Communities for a Better Environment, Black Women for Wellness, Physicians for Social Responsibility Los Angeles), oil industry representatives, and others (e.g., Sunrise Los Angeles).

Key themes raised in support of the proposed Ordinance include:

- **Urgency and Timeline Reduction:** Many speakers urged the City to move swiftly to re-adopt the ordinance and to reduce the 20-year phase-out (amortization) timeline to the shortest, most health-protective period possible.
- **Health and Environmental Impacts:** Speakers shared personal and community stories of suffering from health issues, including chronic illnesses, asthma, headaches, nausea, cancer, and reproductive harm, that they directly linked to neighborhood oil drilling. Research findings were also presented, showing higher concentrations of air pollutants and adverse health effects near oil extraction sites.
- **Call to Regulate Well Maintenance:** A recurring request was for the Zoning Administrator to immediately reissue the interpretation on well maintenance (ZAI) to regulate or prohibit toxic acid maintenance operations that have reportedly ramped up since the original ordinance was overturned.
- **Operator Accountability and Cleanup:** Speakers insisted that the City must plan ahead for the closure and cleanup of sites, ensuring that oil operators—not taxpayers or communities—bear the full financial responsibility for remediation.
- **Inclusion of Gas Operations:** At least one speaker urged that the ordinance be amended to explicitly include gas operations, noting that oil and gas are often intertwined.

Two comments in opposition were received from a spokesperson for native oil producers/employees and a representative from an oil company. Key themes raised in opposition of the proposed Ordinance include:

- **Illegal Taking and Financial Liability:** The Ordinance was described as a violation of vested property rights and regulatory overreach, which the city will have to "contend with" for "takings" under the Fifth Amendment and the California Constitution.

- **Call for a Full Environmental Impact Report (EIR):** Both speakers urged the City to conduct a full EIR, arguing the previous environmental review was deficient and failed to address significant impacts related to the loss of mineral resources or the plugging and abandonment operations.
- **Increased Foreign Imports:** One speaker argued that eliminating domestic production would simply lead to importing more oil from foreign nations (i.e., Iraq and the Amazon rainforest), which are exempt from California's environmental regulations, thus increasing pollution from foreign tanker traffic.
- **Petroleum Products:** A speaker highlighted that petroleum is essential for many non-fuel products, such as prosthetics, heart valves, and roads, asking what would replace these items.

Second Stakeholder Meeting - October 1, 2025

During the public comment portion of the Second Stakeholder Meeting for the City of Los Angeles's proposed Oil Ordinance, a total of 16 public comments were received. 15 comments were generally in favor of the proposed Ordinance to phase out oil drilling and ban new wells, often urging the City to strengthen certain provisions. Speakers were primarily representing organizations like the STAND-L.A. Coalition (e.g., Black Women for Wellness Physicians for Social Responsibility Los Angeles, Esperanza Community Housing, Communities for a Better Environment, Redeemer Community Partnership) and others (e.g., Sunrise Los Angeles, Protect Plan Now, Harbor Gateway North Planning and Land Use Committee, LA Neighborhood Council Sustainability Alliance). Key themes raised in support of the proposed Ordinance include:

- **Support for Swift Re-Adoption:** Multiple speakers, largely representing organizations like the STAND-L.A. Coalition (e.g., Black Women for Wellness Physicians for Social Responsibility Los Angeles, Esperanza Community Housing, Communities for a Better Environment, Redeemer Community Partnership) and others (e.g., Sunrise Los Angeles, Protect Plan Now, Harbor Gateway North Planning and Land Use Committee, LA Neighborhood Council Sustainability Alliance), urged the City to swiftly re-adopt the ordinance.
- **Shorter Phase-Out Timeline:** A significant majority called for reducing the 20-year phase-out timeline to the shortest, most health-protective period possible, suggesting 10 years.
- **Strengthen Idle Well Rules:** Several speakers requested strengthening the language around abandoned, discontinued, or idle wells to mandate they be plugged and abandoned, rather than just considered terminated, to prevent leaks of methane and toxic chemicals.

- **Operator Accountability for Cleanup:** Speakers stressed that oil operators must be held accountable for the costs and execution of site cleanup and remediation.
- **Health and Environmental Concerns:** Commenters shared personal or community experiences with the devastating health impacts (asthma, cancers, reproductive harms, etc.) and environmental consequences (smell, leaks, fire, and climate crisis) of neighborhood oil drilling, particularly in communities of color.
- **Specific Site Inclusion:** One speaker urged the inclusion of the Playa del Rey oil field, specifically the gas storage field, in the nonconforming use designation.

One comment in opposition was received from a mineral rights owner. Key themes raised in opposition of the proposed Ordinance include:

- **Opposition and Legal Concerns:** A mineral rights owner opposed the Ordinance, arguing that preventing new drilling or maintaining existing wells constitutes an illegal taking of private property without compensation, violating the Equal Protection Clauses. The speaker also warned that the Ordinance would expose the City to billions of dollars in liability (over \$97 billion) from lawsuits and would cost millions in legal fees.
- **EIR:** This commenter urged the City to conduct a full EIR, arguing the Ordinance is not backed by science.
- **Economic and Import Concerns:** The speaker suggested the ban would increase reliance on imported foreign oil, which would lead to increased tanker pollution at the Port of Los Angeles and is being imported from countries with fewer environmental and labor laws.

Discussion

Urgency and Timeline Reduction

Multiple comments were received to request the City to move swiftly to readopt an ordinance and to reduce the 20-year phase-out timeline to the shortest, most health-protective period possible. The City acknowledges the urgent need to protect public health and is moving forward with adopting new oil and gas policy as efficiently as possible under the new authority of AB 3233. The 20-year timeframe is not new; it has been the established timeframe for oil and gas nonconforming uses embedded in the Zoning Code for decades (LAMC Section 12.23 C.4). The City's decision to utilize this existing timeline is driven by the fact the proposed Ordinance is only one component of other work programs to address oil and gas extraction and its resulting impacts citywide. While the proposed Ordinance secures the legal mandate to prohibit new oil and gas drilling, make existing oil and gas drilling uses nonconforming, and start the clock on a determined phase-out

period, the City continues to analyze the feasibility of a shorter timeline through parallel work streams across multiple City departments.

Health and Environmental Impacts

Numerous public commenters shared profound personal and community stories and research findings about the suffering from health issues, including chronic illnesses, asthmas, cancer, and reproductive harm, directly linked to neighborhood oil drilling. The City's primary policy objective is to address the documented health and safety impacts of oil drilling in close proximity to sensitive uses and frontline communities. The Ordinance is a direct response to this evidence and aligns with the state's recognition of these impacts through legislation like SB 1137.

Call to Regulate Well Maintenance (ZAI)

Individuals at the stakeholder meetings called for the Zoning Administrator to immediately reissue the interpretation of well maintenance (ZAI) to regulate or prohibit toxic acid maintenance operations that have reportedly ramped up since the original ordinance was overturned. While this request relates to a separate policy matter that has since been addressed, the proposed Ordinance will incorporate definitions related to well maintenance to provide clarity and transparency as to the types of activities that are prohibited under the Ordinance, unless deemed necessary through a separate zoning review process to prevent, respond to, or cease credible threats to public health, safety, or the environment.

Operator Accountability and Cleanup

Several speakers made it clear that the City must plan ahead for site closure and cleanup, ensuring that oil operators (not taxpayers or communities) bear the full financial responsibility for remediation. While site remediation and cleanup are overseen by state and regional agencies, including CalGEM and the State Water Board, ensuring specialized oversight when sites are permanently abandoned, the City is also examining site cleanup and remediation policies through separate Council instruction (Council File No. 21-1395). Through the parallel work streams that the City is undertaking, comprehensive environmental cleanup of contaminated sites, is being assessed with the ultimate goal of ensuring that land formerly used for oil drilling is properly cleared for future redevelopment.

Inclusion of Gas Operations

At least one speaker urged that the proposed Ordinance be amended to explicitly include the Playa del Rey gas storage facility, noting that oil and gas are often intertwined. The proposed Ordinance addresses upstream oil and gas activities (such as extraction, initial separation of oil, water and natural gas from hydrocarbon formation) making all oil and gas activities a nonconforming use. However, midstream storage facilities like the one at Playa del Rey are exempt from the ordinance as they are facilities operated by public utilities regulated by the CPUC, in this case SoCalGas, and are under a separate State regulatory agency and governed by sector-

specific regulations. Upstream oil and natural gas extraction is thus distinct in terms of both operations and regulations from midstream activities and utilities that operate natural gas storage facilities. The ordinance is limited to upstream activities.

Illegal Taking and Financial Liability

At least one commenter described the proposed Ordinance as a violation of vested property rights and regulatory overreach, which the City will have to contend with for takings under the Fifth Amendment and the California Constitution, leading to billions of dollars in liability. The Ordinance being proposed under the authority of AB 3233 is not an illegal taking or an unlawful infringement on property rights; rather, it is a legitimate exercise of the City's inherent police power, which is supported by the new state law clarifying local regulatory authority over oil and gas operations. While the U.S. Constitution's Fifth Amendment mandates that no private property shall be taken for public use without the payment of just compensation, the Ordinance is a land use regulation—not an act of eminent domain. It amends the LAMC by phasing-out a nonconforming use through the application of a previously established timeline dating back to the 1950's, thereby utilizing a long-established phase-out period thought to be commensurate with the investment involved. This approach does not extinguish vested rights, interfere unlawfully with contracts, or mandate compensation. Throughout the phase-out period, operators remain free to continue lawful production consistent with their existing approvals and may apply for the discretionary Health and Safety Exception to perform otherwise prohibited activities, such as maintenance, redrilling, or deploying new temporary equipment under the allowable parameters.

Call for a Full Environmental Impact Report (EIR)

At least two speakers urged the City to conduct a full EIR, arguing the previous environmental review for the Oil Ordinance No. 187,709 was deficient and failed to address significant impacts related to the loss of mineral resources or the plugging and abandonment operations. The Initial Study and Mitigated Negative Declaration (IS/MND) evaluates the Ordinance's scope and its potential environmental effects. State law, specifically the Surface Mining and Reclamation Act of 1975, expressly excludes petroleum and natural gas from the definition of a mineral. Based on current policy within the City, oil and gas are not considered a mineral resource of local importance. The proposed Ordinance is consistent with numerous, more current City and State policies that mandate a transition away from fossil fuels and prioritize public health over extraction activities. Examples include but are not limited to: The City's Plan for a Healthy LA, which aims to protect communities from the noxious effects of oil and gas extraction and the state goals outlined in CARB's 2022 Scoping Plan, which calls for an aggressive reduction in petroleum use and a transition to carbon neutrality. The Initial Study (IS) determined that, while short-term, temporary activities associated with foreseeable well abandonment could result in potential impacts related to Noise, Hazards and Hazardous Materials, and Biological Resources, these effects are either less than significant or mitigated to a less than significant level through recommended mitigation measures. The IS concludes that the elimination of long-term operational emissions and associated hazards constitutes an overall beneficial environmental impact and that a Mitigated

Negative Declaration (MND) is appropriate, as the project does not result in any significant, unmitigated effects.

Increased Foreign Imports

One speaker claims that eliminating domestic production would lead to importing more oil from foreign nations (i.e., Iraq and the Amazon rainforest), which are exempt from California's environmental regulations, and increasing pollution from foreign tanker traffic. This claim is speculative, is not supported with any credible substantial evidence to support the assertion, and misrepresents the core purpose of the proposed Ordinance. The proposed Ordinance aims to address incompatible land use regulations of industrial oil and gas drilling and extraction within the neighborhoods in the City of Los Angeles, particularly where sensitive receptors like residences exist. While the primary objective is to protect incompatible and adjacent land uses here in Los Angeles causing documented health harm to residents, and not intended to regulate the broader global or state energy supply, this policy does raise awareness about consumer choices of petroleum-based products made by Angelenos. On the topic of environmental justice, the City of Los Angeles has and continues to lead by example on this policy and others, including active work programs related to renewable energy (CF 23-0141 and CF 22-0120-S1) and on the whole is working to implement policy that will move the needle and shift behavior towards a more sustainable future.

Petroleum Products

At least one speaker highlighted that petroleum is essential for many non-fuel products, such as prosthetics, heart valves, and roads, asking what would replace these items. The proposed Ordinance prohibits oil and gas drilling activities within City limits but does not prohibit the use or manufacture of essential non-fuel products derived from petroleum sources elsewhere. The proposed Ordinance initiates a phased transition to address local health and safety while encouraging broader long-term shifts toward sustainable materials and energy alternatives.

Conclusion and Recommendation

The proposed Ordinance would prohibit new oil and gas drilling citywide; declare all existing oil and gas activities a nonconforming use in all zones; mandate the cessation of all nonconforming oil and gas operations within a 20-year period; disallow the maintenance, expansion, re-drilling, deepening, or intensification of existing extraction activities and wells in all zones (except for specific, limited Well Servicing); and create a separate zoning review process to assess activities that may prevent, respond to, or cease credible threats to public health, safety, or the environment. The proposed Ordinance is a direct response to the enhanced regulatory authority granted to local governments by AB 3233, aligning the City with broader state legislative trends such as SB 1137, to prioritize public health and environmental justice over continued urban oil and gas extraction. The proposed Ordinance is one component of a larger, essential citywide initiative; while it may not stop all operations immediately, existing oil and gas extraction will no longer be permitted to expand, intensify, or introduce new permanent or temporary equipment (including, but not limited to new injection wells, new storage tanks, new on-site pipelines, or

microturbines) or perform well maintenance activities for the exclusive purpose of extending the life of the oil well's function. Further, the proposed Ordinance is intended to address long-standing injustices to frontline communities who have been disproportionately affected from their adverse health impacts. The proposed Ordinance adds to the list of the City's efforts to address environmental justice and climate change as well as to reassess how it utilizes its land use authority. 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 Chapter I of the LAMC and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC.

FINDINGS

Land Use Findings

City Charter Section 556 (General Plan)

In accordance with City Charter Section 556, the proposed Oil and Gas Drilling Ordinance (“Oil Ordinance” or “Ordinance”) consistent with Assembly Bill (AB) 3233 is in substantial conformance with the purposes, intent, and provisions of the General Plan. As outlined below, the proposed Ordinance would support and further accomplish the goals, objectives, and policies of the General Plan, such as the following policies that recognize the negative health and safety implications of locating oil wells in proximity to residential and other sensitive uses:

West Adams - Baldwin Hills - Leimert Community Plan
<p>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.</p>
Conservation Element - Section 19: Resource Management (Fossil Fuels): Oil
<p>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.</p> <p>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.</p>
Safety Element
<p>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.</p> <p>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.</p>

<p>Policy 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.</p>
<p>A Plan for a Healthy Los Angeles. Chapter 5: Section 5.4 Noxious Activities. (Health Element)</p>
<p>Policy 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.</p>
<p>L.A. Green New Deal (Sustainable City Plan)</p>
<p>Equity Initiative. Coordinate with L.A. County to develop a sunset strategy for oil and gas production operations countywide.</p> <p>Equity Initiative. Reduce oil production by 40% below 2013 levels.</p>

The vast number of these policies recognize the negative health and safety implications of locating oil wells in proximity to residential and other sensitive uses. Further, the City has adopted these policies over the last 20 years that encourage either increased management or termination of oil drilling and the reliance on alternative energy sources. The proposed Ordinance is consistent and does not conflict with the policies identified above, as it would require the termination of oil and gas extraction in the City and limit the expansion and intensification of the nonconforming use during the 20-year phase out period.

The only policies that may arguably not be fully implemented by the Ordinance would be the Objective and Policy 1 in the Conservation Element, which provides:

<p>Conservation Element - Section 19: Resource Management (Fossil Fuels): Oil</p>
<p>Objective: Conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits located within the city's jurisdiction so as to protect the petroleum resources for the use of future generations and to reduce the city's dependency on imported petroleum and petroleum products.</p> <p>Policy 1: Continue to encourage energy conservation and petroleum product reuse.</p> <p style="padding-left: 40px;">Program 1: Public information and energy conservation incentives programs.</p> <p style="padding-left: 40px;">Program 2: Petroleum products recycling.</p>

Program 3: Alternative fuel and energy sources research and use.

Programs 1, 2, and 3, listed under this objective and policy above, are intended to implement this objective and policy are related to energy conservation incentives and education, petroleum product recycling, and encouraging the use of alternative fuels and energy. As such, the proposed Ordinance is not in conflict with these policies and objectives. The proposed Ordinance will eventually stop the extraction of existing oil and gas reserves and will preserve the petroleum product in place. While it may not meet the stated intent to reduce dependence on fossil fuels outside of the State or country, the proposed Ordinance will support the City and State's numerous policies for use of renewable energy over fossil fuels. Additionally, as the proposed Ordinance has a 20-year phase-out schedule, it allows continued extraction of oil and gas while technologies continue to develop to move transportation and other sectors off of fossil fuels. Moreover, the proposed Ordinance is consistent with the policies' intent for being "environmentally sensitive" as it supports protecting sensitive uses from the harmful effects of future oil and gas well activities. There is no objective or policy or program in the Conservation Element mandating or encouraging the protection of existing production activities and nothing in the policies in the Conservation Element shows those policies were adopted by the City Council to protect the environment.

As such, while the 2001 Conversation Element provides a map of the various oil fields in the City and discusses petroleum as a resource, as discussed above, it encourages reducing dependence and use of petroleum. Moreover, other General Plan policies recognize the activities associated with its extraction to be detrimental to public health, safety, and the environment and call for policies like the proposed Ordinance. This is reflected in recent City initiatives and ordinances such as the Green New Deal, LA 100, 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 but not limited to policy 5.4 of the Plan for a Healthy Los Angeles (Health Element) and policies 1.2.2 and 1.2.7 of the Safety Element.

The proposed Ordinance is consistent with the City's General Plan and other goals and policies that encourage buffers from active wells and call for a transition toward green energy sources such as renewable solar. The proposed Ordinance will help further the goals of the General Plan's Plan for a Healthy Los Angeles, 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.

Cessation of oil and gas extraction activities is consistent with the City's General Plan, specific plans and overlays and zoning, as well as the City's Green New Deal and SCAG's Connect SoCal 2024, 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.

The General Plan encourages the conservation and orderly extraction of non-renewable resources, including petroleum, where appropriate. The oil and gas resources are conserved under the proposed Ordinance and only restricted from extraction (i.e., they remain physically in

the ground and are not consumed or destroyed); this conservation is important to balance other policies in the General Plan that are furthered and met by the proposed Ordinance. Further, the Ordinance is strongly aligned with numerous other General Plan elements, including the Plan for a Healthy Los Angeles and the Safety Element, which explicitly call for the reduction of hazards from noxious activities. Additionally, in light of the State's goals, codified in numerous statutes, bills, and policies, including the California Air Resources Board (CARB) 2022 Scoping Plan adopted to comply with Senate Bill (SB) 32, which calls for net neutrality and reduction of carbon emissions by 85 percent by 2045, and bills such as SB 1137 to protect sensitive users near oil wells to protect human health, eliminating oil production in the City aligns with the General Plan policies as well as the other state and local goals to reduce reliance on fossil fuels.

City Charter Section 558 and LAMC Chapter 1A Section 13B.1.3. (Zoning Code Amendment)

In accordance with City Charter Section 558(b)(2) and Section 13.B.1.3.E.1.b. of Chapter 1A of the LAMC, the adoption of the proposed Ordinance demonstrates conformity with public necessity, convenience, general welfare and good zoning practice. This is achieved by amending the Los Angeles Municipal Code to prohibit new oil and gas extraction and mandate the cessation of all existing oil and gas well sites within a 20-year period. This policy is a response to the inherent incompatibility of industrial oil production with urban residential and sensitive land uses.

The proposed Ordinance's policy is directly supported by recent state legislation. The proposed Ordinance is a direct exercise of the legal authority granted to local governments by AB 3233, which affirms the right of the City to regulate, limit, or prohibit oil and gas operations within its boundaries. Furthermore, by utilizing the nonconforming use status and a 20-year phase-out period, the City furthers similar public health outcomes promoted by SB 1137, which created a 3,200-foot health protection zone around sensitive receptors. This health protection zone covers a majority of the land in the City of Los Angeles due to historic land use patterns, with approximately 70 percent of the City zoned for residential uses. These provisions are necessary to preserve and improve the health and livability of the City by addressing the long-standing injustices to frontline communities and communities of color disproportionately affected by the health impacts of oil drilling. Therefore, the proposed Ordinance utilizes appropriate zoning tools, such as but not limited to a prohibition for new oil and gas uses and nonconformity for existing oil and gas uses, to implement public health and environmental justice policies as indicated under the General Plan findings.

Environmental Findings

The City of Los Angeles, as the Lead Agency, prepared a Mitigated Negative Declaration (MND), Case No. ENV-2025-2885-MND, for the proposed Ordinance. The following conclusions are based on information currently available. If presented with new information prior to the adoption of the environmental document, the City Council reserves the right to review the information before making CEQA findings.

As detailed in the Initial Study/MND, the proposed Ordinance would result in less than significant or no impact related to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, transportation, tribal cultural resources, utility and service systems, wildfire and mandatory findings of significance. Voluntary mitigations are imposed for air quality and biological resources. The Ordinance would result in less than significant impacts with mitigation incorporated with regard to hazardous materials and noise.

In consideration of the whole administrative record and all comments received regarding the MND and the proposed Ordinance, the City Planning Commission should 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.

EXHIBIT A

Proposed Ordinance (November 2025)

ORDINANCE NO. _____

An ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7., 5D.9.7, 8.2.4., 12.1.2., 12.5.4., 13B.2.2., and Division 14.3. of Chapter 1A of the LAMC to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones.

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

Section 1. Section 12.03. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended to delete the definition of TEMPORARY GEOLOGICAL EXPLORATORY CORE HOLE.

Sec. 2. Subdivision 17. of Subsection A. of Section 12.20. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

17. (None)

Sec. 3. Subdivision 4. of Subsection C. of Section 12.23. of Article 2 of Chapter I of the Los Angeles Municipal Code is amended as follows:

4. Oil Wells. (Amended by Ord. No. 188,XXX, Eff. X/XX/26). All applicable words/phrases defined in Section 13.01 B. (Definitions) of this Code shall apply to this Oil Wells Subdivision.

(a) **Nonconforming Use Limitation.** All Oil Well sites are a nonconforming use as of the effective date of this Ordinance and shall conform to the following:

- (1) No new Oil Well for the production of oil, gas, or other hydrocarbon substances may be drilled.
- (2) No existing Oil Well for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
- (3) The Oil Well site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited Oil Well activity under Subsections (1) and (2), or new permanent or temporary Oil Well site equipment are introduced beyond the limits of what was originally permitted.

- (4) No existing Oil Well site operator or proponent shall request a modification of conditions of a discretionary zoning approval granted prior to the effective date of this Ordinance.
- (5) The operation of all Oil Well sites shall cease within 20 years from the effective date of the ordinance, at which point the use shall be deemed terminated. The City reserves its discretion to alter or shorten this 20 year period, or otherwise abolish uses, at any Oil Well site. Nothing in this Ordinance shall be construed to grant vested rights to continue any use at any Oil Well site for the whole of this 20 year period.
- (6) All nonconforming Oil Well sites shall be in strict compliance and accordance with all applicable local, state, and federal laws, regulations, rules, and standards for abandonment.
- (7) If an Oil Well or Oil Well site operations are abandoned, discontinued or idled for a continuous period of one year, such well and/or use shall be deemed terminated. The well and/or use shall not be eligible for re-establishment after it has been deemed terminated.
- (8) An Oil Well site operator as defined by Public Resources Code Section 3237 shall comply with the mitigation measures and mitigation monitoring program adopted with this Ordinance in the plugging and abandoning of all wells, including the decommissioning of oil well facilities.
- (b) **Well Servicing Exception.** Repair and servicing work may be carried out on an existing Oil Well site if the scope of work does not meet the criteria for Well Maintenance.
- (c) **Health and Safety Exception.** Otherwise prohibited activities, equipment, or changes to operations may be approved on nonconforming Oil Well sites only in order to prevent, respond to, or cease a threat to public health, safety, or the environment in accordance with procedures set forth in this Section:
- (1) **Administrative Review.** The Department of City Planning shall determine compliance under Administrative Review

only when the following Qualifying Criteria for Administrative Review are met. The Administrative Review process shall be conducted pursuant to Sec. 13B.3.1. (Administrative Review) of Chapter 1A of this Code, except Sec. 13B.3.1.B.2. (Initiation) and Sec. 13B.3.1.F. (Scope of Action) shall not apply:

- (i) A scope of work that satisfies either a formal order or requirement from any local, county, state, or federal agency indicating that the proposed scope of work is required in order to satisfy compliance with a documented notice, or
- (ii) A formal, written acknowledgement from any local, county, state, or federal agency to the operator about the need to perform specific oil well activities and/or install new equipment in order to prevent or respond to a threat to public health, safety, and/or the environment.

(2) **Quasi-Judicial Review.** The Zoning Administrator shall determine compliance under the procedures of Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit when it does not meet the Qualifying Criteria for Administrative Review above.

- (i) An application shall be filed and reviewed pursuant to the procedures of Sec. 13B.2.2.H. (Modification Procedures) of Chapter 1A of this Code, except the notice requirements and findings shall apply as follows:

- a. **Notice.** Notice shall be mailed to owners and occupants of all property within and outside the City within 1,500 feet of the exterior boundaries of the Oil Well site subject to the application.

- b. **Findings.** The Zoning Administrator shall grant an exception pursuant to Section 12.23 C.4(a) if the following Findings can be made:

- i. That the proposed scope of work for a legally nonconforming Oil Well site will not adversely affect any element

of the General Plan, including those which address the prevailing inequities in environmental justice.

- ii. That the use will not be detrimental to the public health, safety, and welfare of persons residing or working in the general vicinity, and will not be detrimental or injurious to property and improvements in the surrounding neighborhood, especially those identified as disadvantaged communities, pursuant to the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment's CalEnviroScreen.
- iii. That the use will incorporate infrastructure and safety procedures to prevent disruption and nuisance impacts related to noise, odors, transportation and circulation, and other potential negative land use impacts on the surrounding vicinity.
- iv. That substantial evidence demonstrates the requested scope of work is necessary to prevent, respond to, or cease a credible threat to public health, safety, and/or the environment and that the scope of work will not be executed for the exclusive purpose of expanding, intensifying, or extending the duration of the Oil Well site and its operations.

(d) **Cessation Standards for Nonconforming Sites.** The following regulations shall apply to existing nonconforming Oil Well sites within the City of Los Angeles, until such uses are required to cease operations pursuant to LAMC Section 12.23 C.4:

- (1) All stationary drilling and service rigs, 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).

- (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.

Sec. 4. Subdivision 18. of Subsection U. of Section 12.24. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

18. (None)

Sec. 5. Subdivision 47. of Subsection W. of Section 12.24. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

47. (None)

Sec. 6. Section 13.01. of Article 3 of Chapter I of the Los Angeles Municipal Code shall be amended to read as follows:

A. Applicability. No new Oil Drilling districts are permitted as of the effective date of this Ordinance. The provisions of this Section and Sec. 12.23 C.4 (Nonconforming Use of Land) shall apply to the districts established by ordinance and to remain until said district is terminated in accordance with City Charter Section 558. 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.

B. Definitions - For the purpose of this section the following words/phrases are defined:

“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 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 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.

“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 the Los Angeles Fire Code except any well operated by a public utility regulated by the California Public Utilities Commission. Oil Well shall also mean any associated facilities such as production areas and other appurtenant structures and equipment located on the subject property/properties.

“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, natural gas or other hydrocarbon substances.

“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”.

“Well Maintenance” shall mean any scope of work for oil, gas, or hydrocarbon substance extraction that meets either of the following two criteria: 1) A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division or 2) A scope of work that requires notification per the South Coast Air Quality Management District’s Rule 1148.2 - “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing. The terms “maintain” and “maintained” shall have the same meaning and application as the definition of “Well Maintenance”.

“Well Servicing” shall mean repair and servicing work that is carried out on an existing Oil Well site if the scope of work does not meet the criteria for Well Maintenance. Examples of Well Servicing may include activities such as: well pump replacement, the repair or replacement of existing underground and/or aboveground storage tanks, and repair or replacement of existing gas/oil pipelines that service the Oil Well operations. Well Servicing may also include the use of a workover rig to perform well pulling and efforts to retrieve tools from a well.

C. (None)

D. (None)

E. Existing Standard Conditions. Standard Conditions incorporated by ordinance through the establishment of an oil drilling district shall remain in effect for existing nonconfirming oil drilling districts.

1. **Nonurbanized Areas.** Each oil drilling district established in a nonurbanized 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 I or A may be established or maintained on each acre of land, except that there may be one Oil Well Class I or A on any land surrounded on all sides by public or approved private streets. Provided, however, in determining conditions for drilling, the Zoning Administrator may permit surface operations for more than one Oil Well Class I 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 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 116th 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 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 I 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 I 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, 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 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 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)**

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 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 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, 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 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 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 the problem and with those persons 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.
- (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.

F. Existing Additional Conditions. Additional Conditions imposed by the Council via ordinance, or the Zoning Administrator via approvals in each district as incorporated by reference and deemed necessary and proper shall remain in effect for existing nonconforming oil drilling districts and 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 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.
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. That no more than one well shall be bottomed in each five (5) acres of the drilling district.
14. **(None)**
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 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 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 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 used to prevent vertical movement of groundwater.
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 above the drilling or service rig floor not reasonably necessary for ingress and egress including the elevated portion thereof used as a hoist, shall be enclosed with fire-resistant 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 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, all boilers and all other drilling equipment shall be entirely removed from the premises unless such drilling or service rig 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 a 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. 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 Zoning 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)**

G. (None)

H. Compliance Review. The Zoning Administrator shall have the authority to conduct investigations to verify compliance with existing conditions imposed pursuant to any discretionary zoning approval authorizing the drilling, deepening or maintaining of an Oil Well site in either an oil drilling district or within the M3 Zone within 500 feet of a more restrictive zone.

1. Authority.

(a) The Zoning Administrator reserves the right to require an applicant to file for compliance review as a condition of a discretionary zoning approval and modify, add, or delete conditions of operation, and/or modify the grant, as needed, pursuant to Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit.

(b) The Zoning Administrator reserves the right to modify, add, or delete conditions of operation, and/or modify the grant, as needed, if upon investigation, they find potential violation of any conditions of said discretionary zoning approval, pursuant to Sec. 13B.6.1. (Evaluation of Non-Compliance).

(c) The Zoning Administrator additionally reserves the right to initiate Nuisance Abatement/Revocation proceedings pursuant to Sec. 13B.6.2. (Nuisance Abatement/Revocation) should any documented evidence be submitted showing continued violations associated with the use or upon failure to file for, or comply with, any requisite compliance review.

2. Procedures.

(a) **Filing.** Applicants shall file in accordance with procedures of Sec. 13B.2.2.H. for a Modification Procedures for a Class 2 Conditional Use Permit, Sec. 13B.6.1 for an Evaluation of Non-Compliance, or Sec. 13B.6.2 for Nuisance Abatement/Revocation proceedings with the Department of City Planning on a form provided by the Department, requesting a Zoning Administrator determination of the conditions under which the operations may be conducted, until such operations are required to cease pursuant to Section 12.23 C.4 of this Code.

(b) **Notice of Public Hearing.** For any Compliance Review, Evaluation of Non-Compliance, or Nuisance Abatement/Revocation proceedings, the Zoning Administrator shall set the matter for public hearing pursuant to the procedures set forth in Sec. 13B.2.2.C.1. (Notice of Public Hearing), except that:

(1) Notice shall be mailed to owners and occupants of all property within 1,500 feet of the exterior boundaries of the Oil Well site within and outside the City subject to the application.

(2) The procedures of this Subdivision shall control over any contrary procedures prescribed by existing condition or grant in any discretionary zoning approval received prior to the effective date of this Ordinance.

(c) **Decision.** The Zoning Administrator shall make their written determination and shall forthwith transmit a copy to the applicant. The determination shall become final after an elapsed period of 15 days from the notification of determination mailing to the applicant, unless an appeal is filed.

(d) **Appeal.** If an appeal is filed within 15 days of the mailing of the notification of determination, the provisions of Sec. 13B.2.2.G. (Appeals) shall apply for a Compliance Review determination, Sec 13B.6.1.G (Appeals) shall apply for an Evaluation of Non-Compliance determination, and Sec. 13.B.6.2.G (Appeals) shall apply for a Nuisance Abatement/Revocation determination, concerning the filing and consideration of appeals, except that in all instances notice of public hearing shall be given in the same manner as in Sec. 13.01 H.2(b).

I. (None)

J. (None)

K. (None) - See Section 12.23 C.4(c)

Sec. 7. Section 1.4.7. of Division 1.4. of Article 1 of Chapter 1A of the Los Angeles Municipal Code shall be amended to delete SEC. 1.4.7. WARREN E&P, INC. V. CITY OF LOS ANGELES AND OIL REGULATIONS in its entirety.

Sec. 8. Section 5D.9.7. of Division 5D.9. of Part 5D. of Article 5 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 5D.9.7. OIL, GAS, OR HYDROCARBON WELL

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 the Los Angeles Fire Code except any well operated by a public utility regulated by the California Public Utilities Commission. Oil, gas, or hydrocarbon well shall also mean any associated facilities such as the production areas and other appurtenant structures and equipment located on the subject property/properties.

Sec. 9. Subsection A. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 8.2.4. OIL DRILLING DISTRICTS (O)

A. Intent

An *Oil Drilling District (O)* establishes standards and procedures for *oil, gas, or hydrocarbon wells* in areas in the City where oil drilling and related operations were permitted, conditionally or otherwise, prior to the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233), which prohibits all new *oil, gas, or hydrocarbon wells* and deems all existing *oil, gas, or hydrocarbon wells* to be a *nonconforming use*.

Sec. 10. Paragraph 1. of Subsection B. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

B. Applicability

1. General Applicability

No new Oil Drilling districts are permitted as of the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233). The provisions of this *Section (Oil Drilling Districts(O)) and Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* shall apply to the Supplemental Districts established by ordinance and to remain until said district is terminated in accordance with *Sec. 13B.1.3. (Zoning Code Amendment)*. The provisions of this *Section (Oil Drilling Districts(O))* do not apply to the location of subterranean gas holding areas or *oil, gas, or hydrocarbon wells* that are operated as a public utility regulated by the California Public Utilities Commission.

Sec. 11. The first non-numbered text in Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended as follows, excluding the Paragraphs of Subsection C.:

C. District

Standards

Standard conditions incorporated by ordinance through the establishment of an *Oil Drilling District (O)* shall remain in effect for any existing nonconforming *Oil Drilling District (O)*.

Sec. 12. Sub-sub-subparagraph b) of Sub-subparagraph iii. of Subparagraph c. of Paragraph 1. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- b) Had not been abandoned in accordance with state regulations prior to January 24, 1982; and

Sec. 13. Subparagraph a. of Paragraph 2. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- a. Additional conditions imposed by the *City Council* via ordinance, or the *Zoning Administrator* via approvals in each *Oil Drilling District (O)* as incorporated by reference in an ordinance and deemed necessary and proper shall remain in effect for existing nonconforming *Oil Drilling Districts (O)* and are as follows:

Sec. 14. Sub-subparagraph x. of Subparagraph a. of Paragraph 2. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- x. (None) [Editor's note: Formerly Chapter I, Section 13.01.F.14.]

Sec. 15. Paragraph 3. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

3. Compliance Review

The *Zoning Administrator* shall have the authority to conduct investigations to verify compliance with existing conditions imposed pursuant to any discretionary zoning approval authorizing the drilling, deepening or maintaining of an *oil, gas, or hydrocarbon well* site in either an *Oil Drilling District (O)* or within the M3 Zone within 500 feet of a more restrictive zone.

a. Authority

- i. The *Zoning Administrator* reserves the right to require an applicant to file for compliance review as a condition of a discretionary zoning approval and modify, add, or delete conditions of operation, and/or modify the grant, as needed, pursuant to *Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit*.

- ii. The *Zoning Administrator* reserves the right to modify, add, or delete conditions of operation, and/or modify the grant, as needed, if upon investigation, they find potential violation of any conditions of said discretionary zoning approval, pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)*.
 - iii. The *Zoning Administrator* additionally reserves the right to initiate Nuisance Abatement/Revocation proceedings pursuant to *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* should any documented evidence be submitted showing continued violations associated with the use or upon failure to file for, or comply with, any requisite compliance review.
- b. **Process**
- i. **Application**
 - a. Applicants shall file in accordance with procedures of *Sec. 13B.2.2.H. for a Modification Procedures for a Class 2 Conditional Use Permit, Sec. 13B.6.1 for an Evaluation of Non-Compliance, or Sec. 13B.6.2 for Nuisance Abatement/Revocation* proceedings with the *Department of City Planning* on a form provided by the Department, requesting a *Zoning Administrator* determination of the conditions under which the operations may be conducted, until such operations are required to cease pursuant to *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*.
 - ii. **Notification**
 - a. Regardless of the provisions of *Sec. 13B.2.2. (Class 2 Conditional Use Permit)*, an application for any Compliance Review, Evaluation of Non-Compliance, or Nuisance Abatement/Revocation proceedings pursuant to *this Paragraph (Compliance Review)* shall instead provide notification via mail to the owners and occupants of all property within 1,500 feet of the exterior boundaries of the *Oil, Gas, or Hydrocarbon well* site within and outside the *City* subject to the application.
 - b. The procedures of this Subdivision shall control over any contrary procedures prescribed by existing condition or grant in any discretionary zoning approval received prior to the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233).
 - iii. **Decision**
 - a. The *Zoning Administrator* shall make their written determination and shall forthwith transmit a copy to the applicant. The determination shall become final after an elapsed period of 15 days from the notification of

determination mailing to the applicant, unless an appeal is filed.

iv. Appeal

- a. If an appeal is filed within 15 days of the mailing of the notification of determination, the provisions of *Sec. 13B.2.2.G (Appeals)* shall apply for a Compliance Review determination, *Sec. 13B.6.1.G (Appeals)* shall apply for an Evaluation of Non-Compliance determination, and *Sec. 13B.6.2.G (Appeals)* shall apply for a Nuisance Abatement/Revocation determination, concerning the filing and consideration of appeals shall apply, except that in all instances notice of public hearing shall be given in the same manner as in *Sec. 8.2.4.3.b.ii. (Notification)*.

Sec. 16. Subsection E. of Section 12.1.2. of Division 12.1 of Article 12 of Chapter 1A of the Los Angeles Municipal Code shall be added to read as follows:

- E. All regulations applicable to *oil, gas, or hydrocarbon wells* in this *Article (Nonconformities)* shall be found in *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*.

Sec. 17. Section 12.5.4. of Division 12.5. of Article 12 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 12.5.4. NONCONFORMING OIL, GAS, OR HYDROCARBON WELL USE

A. Nonconforming Use Limitation of Oil, Gas, or Hydrocarbon Wells

For the purposes of this Section, all words/phrases shall be applied as defined in *Division 14.3. (Glossary)*.

1. All *oil, gas, or hydrocarbon well* sites are a nonconforming use as of the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) and shall conform to the following:
 - a. No new *oil, gas, or hydrocarbon well* for the production of oil, gas or other hydrocarbon substances may be drilled.
 - b. No existing *oil, gas, or hydrocarbon well* for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
 - c. The *oil, gas, or hydrocarbon well* site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited *oil, gas, or hydrocarbon well* activity under Suparagraph (a) and (b), or new permanent or temporary *oil, gas, or hydrocarbon well* site equipment are introduced beyond the limits of what was originally permitted.

- d. No existing *oil, gas, or hydrocarbon well* site operator or proponent shall request a modification of conditions of a discretionary zoning approval granted prior to the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233).
- e. The operation of all *oil, gas, or hydrocarbon well* sites shall cease within 20 years from the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) at which point the use shall be deemed terminated. The City reserves its discretion to alter or shorten this 20 year period, or otherwise abolish uses, at any *oil, gas, or hydrocarbon well* site. Nothing in this Ordinance shall be construed to grant vested rights to continue any use at any *oil, gas, or hydrocarbon well* site for the whole of this 20 year period.
- f. All *nonconforming oil, gas, or hydrocarbon well* sites shall be in strict accordance with all applicable local, state, and federal laws, regulations, rules, and standards for abandonment.
- g. If an *oil, gas, or hydrocarbon well* or *oil, gas, or hydrocarbon well* site operations are abandoned, discontinued or idled for a continuous period of one year, such well and/or use shall be deemed terminated. The *oil, gas, or hydrocarbon well* and/or use shall not be eligible for re-establishment after it has been deemed terminated.
- h. An *oil, gas, or hydrocarbon well* site operator as defined by [California Public Resources Code, Div. 3. \(Oil and Gas\), Sec. 3237](#). shall comply with the mitigation measures and mitigation monitoring program adopted with Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) in the plugging and abandoning of all *oil, gas, or hydrocarbon wells*, including the decommissioning of oil well facilities.

B. Well Servicing Exception of Oil, Gas, or Hydrocarbon Wells

Repair and servicing work may be carried out on an existing *oil, gas, or hydrocarbon well* site if the scope of work does not meet the criteria for Well Maintenance.

C. Health and Safety Exception of Oil, Gas, or Hydrocarbon Wells

Otherwise prohibited activities, equipment, or changes to operations may be approved on *nonconforming oil, gas, or hydrocarbon well* sites only in order to prevent, respond to, or cease a threat to public health and safety, or the environment in accordance with procedures set forth in this Section:

1. Eligibility

- a. The Department of City Planning shall determine compliance under Administrative Review only when the following Qualifying Criteria for Administrative Review are met. The Administrative Review process shall be conducted pursuant to *Sec. 13B.3.1. (Administrative Review)*, except

Sec. 13B.3.1.B.2. (*Initiation*) and Sec. 13B.3.1.F. (*Scope of Action*) shall not apply:

- i. A scope of work that satisfies either a formal order or requirement from any local, county, state, or federal agency indicating that the proposed scope of work is required in order to satisfy compliance with a documented notice, or
 - ii. A formal, written acknowledgement from any local, county, state, or federal agency to the operator about the need to perform specific *oil, gas, or hydrocarbon well* activities and/or install new equipment in order to prevent or respond to a threat to public health, safety, and/or the environment.
- b. The *Zoning Administrator* shall determine compliance under the procedures of Sec. 13B.2.2.H. for a *Modification Procedures for a Class 2 Conditional Use Permit*, when it does not meet the Qualifying Criteria for Administrative Review in *Subparagraph a.*, above.

i. **Application**

- a. An *application* pursuant to this Subsection (*Nonconforming Rights Related to the Health and Safety for Oil, Gas, or Hydrocarbon Wells*) shall be filed and reviewed pursuant to the procedures of Sec. 13B.2.2.H. (*Modification Procedures*), except the notice requirements and findings shall apply as indicated below in *Sub-subparagraphs ii. (Notice)* and *iii. (Findings)* below.

ii. **Notice**

- a. Notice shall be mailed to owners and occupants of all property within and outside the City within 1,500 feet of the exterior boundaries of the *oil, gas, or hydrocarbon well* site subject to the *application*.

iii. **Findings**

- a. The *Zoning Administrator* shall grant a use exception pursuant to Sec. 12.5.4.A. (*Nonconforming Use Limitation of Oil, Gas, or Hydrocarbon Wells*) if the following findings can be made:
 - (i) That the proposed scope of work for a legally *nonconforming oil, gas, or hydrocarbon well* site will not adversely affect any element of the General Plan, including those which address the prevailing inequities in environmental justice.

- (ii) That the use will not be detrimental to the public health, safety, and welfare of persons residing or working in the general vicinity, and will not be detrimental or injurious to property and improvements in the surrounding neighborhood, especially those identified as disadvantaged communities, pursuant to the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment's CalEnviroScreen.
- (iii) That the use will incorporate infrastructure and safety procedures to prevent disruption and nuisance impacts related to noise, odors, transportation and circulation, and other potential negative land use impacts on the surrounding vicinity.
- (iv) That substantial evidence demonstrates the requested scope of work is necessary to prevent, respond to, or cease a credible threat to public health, safety, and/or the environment and that the scope of work will not be executed for the exclusive purpose of expanding, intensifying, or extending the duration of the *oil, gas, or hydrocarbon well* use and its operations.

D. Cessation Standards for Nonconforming Sites

The following regulations shall apply to existing *nonconforming oil, gas, or hydrocarbon well* sites within the *City* of Los Angeles, until such uses are required to cease operations pursuant to *Section 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*:

1. All stationary drilling and service rigs, including their floors and foundations, shall be removed within 30 days after completion or abandonment of the *oil, gas, or hydrocarbon well* (notwithstanding any other provisions of this Code to the contrary).
2. The motors, engines, pumps and tanks of all such *oil, gas, or hydrocarbon 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 *oil, gas, or hydrocarbon 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 *oil, gas, or hydrocarbon wells* shall not exceed 15 feet above existing grade level.

5. The site of such *oil, gas, or hydrocarbon 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.

Sec. 18. Subparagraphs a. and b. of Paragraph 1. of Subsection H. of Section 13B.2.2. of Division 13B.2. of Article 13 of Chapter 1A of the Los Angeles Municipal Code are amended to read as follows:

H. Modification Procedures

1. Development of Site

- a. On any lot or portion of a lot on which an approved or deemed-approved conditional use is permitted pursuant to the provisions of this *Section*, new buildings or structures may be erected, enlargements may be made to existing buildings, and existing uses may be extended on an approved site, provided that plans are submitted to and approved by the *Zoning Administrator*, and, where applicable, the use is consistent with the provisions of *Chapter I. (General Provisions and Zoning), Sec. 12.24 C (Existing Uses)* or *Sec. 12.23 C.4* for lots subject to Chapter I, or *Sec. 12.5.1.E. (Use Not allowed Exceptions), Sec. 12.5.1.F. (Use Not allowed Exceptions), or Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* of this Zoning Code (Chapter 1A) for lots subject to this Chapter.
- b. The *Zoning Administrator* may deny the plans if the *Zoning Administrator* finds that the use does not conform to the purpose and intent of the findings required for a conditional use under this *Section*, or *Sec. 12.23 C.4* for lots subject to Chapter I, or *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* of this Zoning Code (Chapter 1A) where applicable, and may specify the conditions under which the plans may be approved.

Sec. 19. Division 14.3. of Article 14 of Chapter 1A of the Los Angeles Municipal Code is amended to amend the following term as follows:

Oil Well Class I or A: Oil well class I or A is defined as any *Oil, Gas, or Hydrocarbon Well* drilled, conditioned arranged, used or intended to be used for the production of petroleum, natural gas or other hydrocarbon substances.

Oil, Gas, or Hydrocarbon Well: Pursuant to *Sec. 5D.9.7. (Oil, Gas, or Hydrocarbon Well)*, Oil, gas, or hydrocarbon wells are defined as 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 the Los Angeles Fire Code* except any well operated by a public utility regulated by the California Public Utilities Commission. Oil, gas, or hydrocarbon wells shall also mean any associated facilities such as a production areas and other appurtenant structures and equipment located on the subject property/properties.

Well Maintenance: Well Maintenance is defined as any scope of work for oil, gas, or hydrocarbon substance extraction that meets either of the following two criteria: 1) A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division or 2) A scope of work that requires notification per the South Coast Air Quality Management District’s Rule 1148.2 - “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing. The term “maintain” and “maintained” shall have the same meaning and application as the definition of “Well Maintenance”.

Well Servicing: Well Servicing is defined as repair and servicing work that is carried out on existing Oil, Gas, or Hydrocarbon Well sites if the scope of work does not meet the criteria for Well Maintenance. Examples of Well Servicing may include activities such as: well pump replacement, the repair or replacement of existing underground and/or aboveground storage tanks, and repair or replacement of existing gas/oil pipelines that service the Oil, Gas, or Hydrocarbon Well operations. Well Servicing may also include the use of a workover rig to perform well pulling and efforts to retrieve tools from a well.

Sec. 20. STYLE AND FORMATTING CORRECTIONS. City Planning prior to publishing the Code shall ensure all of the following style and formatting corrections are made in Chapter 1A of the Los Angeles Municipal Code in consultation with the City Attorney’s Office:

- A. All numbering of chapters, articles, parts, divisions, sections, subsections, paragraphs, subparagraphs, sub-subparagraphs, and sub-sub-subparagraphs shall match the existing numbering format, style, and hierarchy in Chapter 1A of the Los Angeles Municipal Code (e.g., all numbering ends with a period, except sub-sub-subparagraphs which are punctuated with a parenthetical).
- B. Formatting and typeface style for all headings shall match the existing formatting and typeface style in Chapter 1A of the Los Angeles Municipal Code, including the following, paragraph breaks after subsection headers, no periods at the end of headers, headers of divisions and sections in all caps, and headers of subsections or any lower ordinal in title case with the first letter of each word capitalized.
- C. All internal citations to the Los Angeles Municipal Code shall match the formatting and style of the existing Chapter 1A of the Los Angeles Municipal Code, including adding periods at the end of the citation number, including the title that matches the cited section in parenthesis after the period (e.g., “Sec. 5A.2.2. (Use Applicability)”) or “Paragraph 2. (No Net Loss of Dwelling Units)”), and citations to Chapters of the Los Angeles Municipal Code shall use Roman numerals for the chapter number and include “of this Code” after the parenthetical of the title of the Chapter (e.g., “Chapter I (General Provisions and Zoning) of this Code”).
- D. All internal citations within Chapter 1A of the Los Angeles Municipal Code referring to content modified by this ordinance shall be updated to reflect the latest titles and Section references.
- E. All internal citations within Chapter 1A of the Los Angeles Municipal Code shall be updated to the correct citation where the cited Section number does not exist, but the Section name

is stated clearly (e.g. correct “Sec.13.2.10. (Multiple Approvals)” to “Sec. 13A.2.10. (Multiple Approvals)” because Sec. 13.2.10. does not exist).

- F. All citations stating “section” shall be updated to “Sec.” and those stating “division” shall be updated to “Div.” This does not apply to citations internal to the Division or Section being referenced, in which case the full term of Section or Division shall be used (e.g. “The intent of this Section (Roof Materials) is to...”).
- G. All citations to state law shall be updated to first state the name of the statute, followed by the referenced citation and the title of the referenced citation if available (e.g. California Government Code, Title 7. (Planning and Land Use)).
- H. Words and phrases that are included in the Glossary in Article 14 of Chapter 1A of the Los Angeles Municipal Code shall not be capitalized unless they are proper nouns, mapped areas under Article 1 of Chapter 1A, district names, or zone string components. Any glossary terms used in Chapter 1A shall be indicated by underline in the published Code and linked to the Glossary term in Article 14 of Chapter 1A of the Los Angeles Municipal Code.
- I. Consistent with Sec. 11.01. (Definitions and Interpretation), which states that, “the singular number includes the plural, and the plural, the singular,” singular or plural versions of existing glossary terms may be added into the Glossary in Article 14 of Chapter 1A of the Los Angeles Municipal Code as needed to ensure exact matches in the use of the term in the text of the LAMC and its entry in the Glossary, which is a requirement of the New Interactive Web-based Zoning Code in order to allow the definition to appear in the pop-up of a term when the site-user clicks on the term. Terms added shall include a glossary entry redirecting to the originally defined term (e.g. Applicable Story: See *applicable stories*).
- J. All fonts and/or typeface and spacing and layout (including indentations) of text, headings, graphs and tables, and colors shall match that of the existing published Chapter 1A of the Los Angeles Municipal Code.
- K. All numbers shall be written in accordance with the following protocol:
 - a. Numbers one through nine shall be written out, unless within a table.
 - b. Numbers written as the first word of sentence shall be written out (e.g. “One hundred percent of all affordable housing...”).
 - c. Fractions and numbers including fractions shall be displayed as numerals (e.g. “ $\frac{1}{2}$ ” instead of “one-half”, and $1\frac{1}{2}$ instead of “one and $\frac{1}{2}$ ”).
 - d. Ordinance numbers shall be written so that “Ordinance number” is abbreviated and includes a comma after 3 digits, and includes the effective or operative dates (e.g. “...as established by Ord. No. 176,445 (effective 3/9/05)...”).
 - e. FAR numbers and ratios remain per drafting standard.

- i. Example: "... a FAR of 2.5:1 shall be...",
- f. Zoning District numbers remain as a number.
 - i. Example: "...those lots with a Density District 6 or more restrictive..."
- L. All instances of the percentage symbol (%) shall be updated to "percent" or "percentage" as appropriate unless the percentage is shown within a table, in which case the percentage symbol (%) shall be used.
- M. All instances of reference to an Ordinance number intended to refer to the ordinance being published shall be updated to include the Ordinance number issued prior to publication.

Sec. 21. SEVERABILITY. If any portion, subsection, sentence, clause or phrase of this Ordinance is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this Ordinance. The City Council hereby declares that it would have passed this Ordinance and each portion or subsection, sentence, clause, and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

Sec. 22. URGENCY. The City finds that the continued existence and operation of oil and gas extraction activities, particularly in close proximity to residential areas, schools, and other sensitive land uses, poses a credible, immediate, and ongoing threat to the public health, safety, and general welfare of Los Angeles residents, disproportionately affecting disadvantaged communities. The recent reaffirmation of local authority to regulate or prohibit oil and gas operations through state law (AB 3233) necessitates the immediate implementation of this revised ordinance to prohibit new oil and gas drilling and clearly establish all existing extraction as a nonconforming use subject to a maximum 20-year phase-out period required for the immediate preservation of public health and safety. Therefore, this ordinance shall become effective upon publication pursuant to Section 253 of the Los Angeles City Charter.

Sec. 23. The City Clerk shall certify to the passage of this Ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

EXHIBIT B

Draft Ordinance (September 2025)

ORDINANCE NO. _____

An ordinance amending Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7., 5D.9.7, 8.2.4., 12.1.2., 12.5.4., 13B.2.2., and Division 14.3. of Chapter 1A of the LAMC to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones.

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

Section 1. Section 12.03. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended to delete the definition of TEMPORARY GEOLOGICAL EXPLORATORY CORE HOLE.

Sec. 2. Subdivision 17. of Subsection A. of Section 12.20. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

17. (None)

Sec. 3. Subdivision 4. of Subsection C. of Section 12.23. of Article 2 of Chapter I of the Los Angeles Municipal Code is amended as follows:

4. Oil Wells. (Amended by Ord. No. 188,XXX, Eff. X/XX/26). All applicable words/phrases defined in Section 13.01 B. (Definitions) of this Code shall apply to this Oil Wells Subdivision.

(a) Nonconforming Use Limitation. All Oil Well sites are a nonconforming use as of the effective date of this Ordinance and shall conform to the following:

- (1) No new Oil Well for the production of oil, gas, or other hydrocarbon substances may be drilled.
- (2) No existing Oil Well for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
- (3) The Oil Well site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited Oil Well activity under Subsections (1) and (2), or new permanent or temporary Oil Well site equipment are introduced beyond the limits of what was originally permitted.

- (4) No existing Oil Well site operator or proponent shall request a modification of conditions of a discretionary zoning approval granted prior to the effective date of this Ordinance.
- (5) The operation of all Oil Well sites shall cease within 20 years from the effective date of the ordinance at which point the use shall be deemed terminated.
- (6) All nonconforming Oil Well sites shall be in strict compliance and accordance with all applicable local, state, and federal laws, regulations, rules, and standards for abandonment.
- (7) If an Oil Well or Oil Well site operations are abandoned, discontinued or idled for a continuous period of one year, such well and/or use shall be deemed terminated. The well and/or use shall not be eligible for re-establishment after it has been deemed terminated.
- (8) An Oil Well site operator as defined by Public Resources Code Section 3237 shall comply with the mitigation measures and mitigation monitoring program adopted with this Ordinance in the plugging and abandoning of all wells, including the decommissioning of oil well facilities.

(b) **Well Servicing Exception.** Repair and servicing work may be carried out on an existing Oil Well site if the scope of work does not meet the criteria for Well Maintenance.

(c) **Health and Safety Exception.** Otherwise prohibited activities, equipment, or changes to operations may be approved on nonconforming Oil Well sites only in order to prevent, respond to, or cease a threat to public health, safety, or the environment in accordance with procedures set forth in this Section:

- (1) **Administrative Review.** The Department of City Planning shall determine compliance under Administrative Review only when the following Qualifying Criteria for Administrative Review are met. The Administrative Review process shall be conducted pursuant to Sec. 13B.3.1. (Administrative Review) of Chapter 1A of this Code, except Sec.

13B.3.1.B.2. (Initiation) and Sec. 13B.3.1.F. (Scope of Action) shall not apply:

- (i) A scope of work that satisfies either a formal order or requirement from any local, county, state, or federal agency indicating that the proposed scope of work is required in order to satisfy compliance with a documented notice, or
- (ii) A formal, written acknowledgement from any local, county, state, or federal agency to the operator about the need to perform specific oil well activities and/or install new equipment in order to prevent or respond to a threat to public health, safety, and/or the environment.

(2) **Quasi-Judicial Review.** The Zoning Administrator shall determine compliance under the procedures of Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit when it does not meet the Qualifying Criteria for Administrative Review above.

- (i) An application shall be filed and reviewed pursuant to the procedures of Sec. 13B.2.2.H. (Modification Procedures) of Chapter 1A of this Code, except the notice requirements and findings shall apply as follows:
 - a. **Notice.** Notice shall be mailed to owners and occupants of all property within and outside the City within 1,500 feet of the exterior boundaries of the Oil Well site subject to the application.
 - b. **Findings.** The Zoning Administrator shall grant an exception pursuant to Section 12.23 C.4(a) if the following Findings can be made:
 - i. That the proposed scope of work for a legally nonconforming Oil Well site will not adversely affect any element of the General Plan, including those which address the prevailing inequities in environmental justice.

- ii. That the use will not be detrimental to the public health, safety, and welfare of persons residing or working in the general vicinity, and will not be detrimental or injurious to property and improvements in the surrounding neighborhood, especially those identified as disadvantaged communities, pursuant to the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment's CalEnviroScreen.
- iii. That the use will incorporate infrastructure and safety procedures to prevent disruption and nuisance impacts related to noise, odors, transportation and circulation, and other potential negative land use impacts on the surrounding vicinity.
- iv. That substantial evidence demonstrates the requested scope of work is necessary to prevent, respond to, or cease a credible threat to public health, safety, and/or the environment and that the scope of work will not be executed for the exclusive purpose of expanding, intensifying, or extending the duration of the Oil Well site and its operations.

(d) **Cessation Standards for Nonconforming Sites.** The following regulations shall apply to existing nonconforming Oil Well sites within the City of Los Angeles, until such uses are required to cease operations pursuant to LAMC Section 12.23 C.4:

- (1) All stationary drilling and service rigs, 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).

- (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.

Sec. 4. Subdivision 18. of Subsection U. of Section 12.24. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

18. (None)

Sec. 5. Subdivision 47. of Subsection W. of Section 12.24. of Article 2 of Chapter I of the Los Angeles Municipal Code shall be amended as follows:

47. (None)

Sec. 6. Section 13.01. of Article 3 of Chapter I of the Los Angeles Municipal Code shall be amended to read as follows:

A. Applicability. No new Oil Drilling districts are permitted as of the effective date of this Ordinance. The provisions of this Section and Sec. 12.23 C.4 (Nonconforming Use of Land) shall apply to the districts established by ordinance and to remain until said district is terminated in accordance with City Charter Section 558. 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.

B. Definitions - For the purpose of this section the following words/phrases are defined:

“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 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 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.

“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 the Los Angeles Fire Code except any well operated by a public utility regulated by the California Public Utilities Commission. Oil Well shall also mean any associated facilities such as production areas and other appurtenant structures and equipment located on the subject property/properties.

“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, natural gas or other hydrocarbon substances.

“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”.

“Well Maintenance” shall mean any scope of work for oil, gas, or hydrocarbon substance extraction that meets either of the following two criteria: 1) A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division or 2) A scope of work that requires notification per the South Coast Air Quality Management District’s Rule 1148.2 - “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing. The terms “maintain” and “maintained” shall have the same meaning and application as the definition of “Well Maintenance”.

“Well Servicing” shall mean repair and servicing work that is carried out on an existing Oil Well site if the scope of work does not meet the criteria for Well Maintenance. Examples of Well Servicing may include activities such as: well pump replacement, the repair or replacement of existing underground and/or aboveground storage tanks, and repair or replacement of existing gas/oil pipelines that service the Oil Well operations. Well Servicing may also include the use of a workover rig to perform well pulling and efforts to retrieve tools from a well.

C. (None)

D. (None)

E. **Existing Standard Conditions.** Standard Conditions incorporated by ordinance through the establishment of an oil drilling district shall remain in effect for existing nonconfirming oil drilling districts.

1. **Nonurbanized Areas.** Each oil drilling district established in a nonurbanized 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 I or A may be established or maintained on each acre of land, except that there may be one Oil Well Class I or A on any land surrounded on all sides by public or approved private streets. Provided, however, in determining conditions for drilling, the Zoning Administrator may permit surface operations for more than one Oil Well Class I 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 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 116th 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 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 I 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 I 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, 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 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 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)**

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 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 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, 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 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 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 the problem and with those persons 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.
- (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.

F. Existing Additional Conditions. Additional Conditions imposed by the Council via ordinance, or the Zoning Administrator via approvals in each district as incorporated by reference and deemed necessary and proper shall remain in effect for existing nonconforming oil drilling districts and 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 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.
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. That no more than one well shall be bottomed in each five (5) acres of the drilling district.
14. **(None)**
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 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 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 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 used to prevent vertical movement of groundwater.
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 above the drilling or service rig floor not reasonably necessary for ingress and egress including the elevated portion thereof used as a hoist, shall be enclosed with fire-resistant 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 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, all boilers and all other drilling equipment shall be entirely removed from the premises unless such drilling or service rig 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 a 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. 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 Zoning 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)**

G. (None)

H. Compliance Review. The Zoning Administrator shall have the authority to conduct investigations to verify compliance with existing conditions imposed pursuant to any discretionary zoning approval authorizing the drilling, deepening or maintaining of an Oil Well site in either an oil drilling district or within the M3 Zone within 500 feet of a more restrictive zone.

1. Authority.

(a) The Zoning Administrator reserves the right to require an applicant to file for compliance review as a condition of a discretionary zoning approval and modify, add, or delete conditions of operation, and/or modify the grant, as needed, pursuant to Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit.

(b) The Zoning Administrator reserves the right to modify, add, or delete conditions of operation, and/or modify the grant, as needed, if upon investigation, they find potential violation of any conditions of said discretionary zoning approval, pursuant to Sec. 13B.6.1. (Evaluation of Non-Compliance).

(c) The Zoning Administrator additionally reserves the right to initiate Nuisance Abatement/Revocation proceedings pursuant to Sec. 13B.6.2. (Nuisance Abatement/Revocation) should any documented evidence be submitted showing continued violations associated with the use or upon failure to file for, or comply with, any requisite compliance review.

2. Procedures.

(a) **Filing.** Applicants shall file in accordance with procedures of Sec. 13B.2.2.H. for a Modification Procedures for a Class 2 Conditional Use Permit, Sec. 13B.6.1 for an Evaluation of Non-Compliance, or Sec. 13B.6.2 for Nuisance Abatement/Revocation proceedings with the Department of City Planning on a form provided by the Department, requesting a Zoning Administrator determination of the conditions under which the operations may be conducted, until such operations are required to cease pursuant to Section 12.23 C.4 of this Code.

(b) **Notice of Public Hearing.** For any Compliance Review, Evaluation of Non-Compliance, or Nuisance Abatement/Revocation proceedings, the Zoning Administrator shall set the matter for public hearing pursuant to the procedures set forth in Sec. 13B.2.2.C.1. (Notice of Public Hearing), except that:

(1) Notice shall be mailed to owners and occupants of all property within 1,500 feet of the exterior boundaries of the Oil Well site within and outside the City subject to the application.

(2) The procedures of this Subdivision shall control over any contrary procedures prescribed by existing condition or grant in any discretionary zoning approval received prior to the effective date of this Ordinance.

(c) **Decision.** The Zoning Administrator shall make their written determination and shall forthwith transmit a copy to the applicant. The determination shall become final after an elapsed period of 15 days from the notification of determination mailing to the applicant, unless an appeal is filed.

(d) **Appeal.** If an appeal is filed within 15 days of the mailing of the notification of determination, the provisions of Sec. 13B.2.2.G. (Appeals) shall apply for a Compliance Review determination, Sec 13B.6.1.G (Appeals) shall apply for an Evaluation of Non-Compliance determination, and Sec. 13.B.6.2.G (Appeals) shall apply for a Nuisance Abatement/Revocation determination, concerning the filing and consideration of appeals, except that in all instances notice of public hearing shall be given in the same manner as in Sec. 13.01 H.2(b).

I. (None)

J. (None)

K. (None) - See Section 12.23 C.4(c)

Sec. 7. Section 1.4.7. of Division 1.4. of Article 1 of Chapter 1A of the Los Angeles Municipal Code shall be amended to delete SEC. 1.4.7. WARREN E&P, INC. V. CITY OF LOS ANGELES AND OIL REGULATIONS in its entirety.

Sec. 8. Section 5D.9.7. of Division 5D.9. of Part 5D. of Article 5 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 5D.9.7. OIL, GAS, OR HYDROCARBON WELL

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 the Los Angeles Fire Code except any well operated by a public utility regulated by the California Public Utilities Commission. Oil, gas, or hydrocarbon well shall also mean any associated facilities such as the production areas and other appurtenant structures and equipment located on the subject property/properties.

Sec. 9. Subsection A. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 8.2.4. OIL DRILLING DISTRICTS (O)

A. Intent

An *Oil Drilling District (O)* establishes standards and procedures for *oil, gas, or hydrocarbon wells* in areas in the City where oil drilling and related operations were permitted, conditionally or otherwise, prior to the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233), which prohibits all new *oil, gas, or hydrocarbon wells* and deems all existing *oil, gas, or hydrocarbon wells* to be a *nonconforming use*.

Sec. 10. Paragraph 1. of Subsection B. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

B. Applicability

1. General Applicability

No new Oil Drilling districts are permitted as of the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233). The provisions of this *Section (Oil Drilling Districts(O)) and Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* shall apply to the Supplemental Districts established by ordinance and to remain until said district is terminated in accordance with *Sec. 13B.1.3. (Zoning Code Amendment)*. The provisions of this *Section (Oil Drilling Districts(O))* do not apply to the location of subterranean gas holding areas or *oil, gas, or hydrocarbon wells* that are operated as a public utility regulated by the California Public Utilities Commission.

Sec. 11. The first non-numbered text in Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended as follows, excluding the Paragraphs of Subsection C.:

C. **District**

Standards

Standard conditions incorporated by ordinance through the establishment of an *Oil Drilling District (O)* shall remain in effect for any existing nonconforming *Oil Drilling District (O)*.

Sec. 12. Sub-sub-paragraph b) of Sub-paragraph iii. of Subparagraph C. of Paragraph 1. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- b) Had not been abandoned in accordance with state regulations prior to January 24, 1982; and

Sec. 13. Subparagraph a. of Paragraph 2. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- a. Additional conditions imposed by the *City Council* via ordinance, or the *Zoning Administrator* via approvals in each *Oil Drilling District (O)* as incorporated by reference in an ordinance and deemed necessary and proper shall remain in effect for existing nonconforming *Oil Drilling Districts (O)* and are as follows:

Sec. 14. Sub-paragraph x. of Subparagraph a. of Paragraph 2. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

- x. (None) [Editor's note: Formerly Chapter I, Section 13.01.F.14.]

Sec. 15. Paragraph 3. of Subsection C. of Section 8.2.4. of Division 8.2. of Article 8 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

3. **Compliance Review**

The *Zoning Administrator* shall have the authority to conduct investigations to verify compliance with existing conditions imposed pursuant to any discretionary zoning approval authorizing the drilling, deepening or maintaining of an *oil, gas, or hydrocarbon well* site in either an *Oil Drilling District (O)* or within the M3 Zone within 500 feet of a more restrictive zone.

a. Authority

- i. The *Zoning Administrator* reserves the right to require an applicant to file for compliance review as a condition of a discretionary zoning approval and modify, add, or delete conditions of operation, and/or modify the grant, as needed, pursuant to *Sec. 13B.2.2.H. (Modification Procedures) for a Class 2 Conditional Use Permit*.
- ii. The *Zoning Administrator* reserves the right to modify, add, or delete conditions of operation, and/or modify the grant, as needed, if upon investigation, they find potential violation of any conditions of said discretionary zoning approval, pursuant to *Sec. 13B.6.1. (Evaluation of Non-Compliance)*.
- iii. The *Zoning Administrator* additionally reserves the right to initiate Nuisance Abatement/Revocation proceedings pursuant to *Sec. 13B.6.2. (Nuisance Abatement/Revocation)* should any documented evidence be submitted showing continued violations associated with the use or upon failure to file for, or comply with, any requisite compliance review.

b. Process

i. Application

- a. Applicants shall file in accordance with procedures of *Sec. 13B.2.2.H. for a Modification Procedures for a Class 2 Conditional Use Permit*, *Sec. 13B.6.1 for an Evaluation of Non-Compliance*, or *Sec. 13B.6.2 for Nuisance Abatement/Revocation* proceedings with the *Department of City Planning* on a form provided by the Department, requesting a *Zoning Administrator* determination of the conditions under which the operations may be conducted, until such operations are required to cease pursuant to *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*.

ii. Notification

- a. Regardless of the provisions of *Sec. 13B.2.2. (Class 2 Conditional Use Permit)*, an application for any Compliance Review, Evaluation of Non-Compliance, or Nuisance Abatement/Revocation proceedings pursuant to *this Paragraph (Compliance Review)* shall instead provide notification via mail to the owners and occupants of all property within 1,500 feet of the exterior boundaries of the *Oil, Gas, or Hydrocarbon well* site within and outside the *City* subject to the application.
- b. The procedures of this Subdivision shall control over any contrary procedures prescribed by existing condition or grant in any discretionary zoning approval received prior to

the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233).

iii. Decision

- a. The *Zoning Administrator* shall make their written determination and shall forthwith transmit a copy to the applicant. The determination shall become final after an elapsed period of 15 days from the notification of determination mailing to the applicant, unless an appeal is filed.

iv. Appeal

- a. If an appeal is filed within 15 days of the mailing of the notification of determination, the provisions of *Sec. 13B.2.2.G (Appeals)* shall apply for a Compliance Review determination, *Sec. 13B.6.1.G (Appeals)* shall apply for an Evaluation of Non-Compliance determination, and *Sec. 13.B.6.2.G (Appeals)* shall apply for a Nuisance Abatement/Revocation determination, concerning the filing and consideration of appeals shall apply, except that in all instances notice of public hearing shall be given in the same manner as in *Sec. 8.2.4.3.b.ii. (Notification)*.

Sec. 16. Subsection E. of Section 12.1.2. of Division 12.1 of Article 12 of Chapter 1A of the Los Angeles Municipal Code shall be added to read as follows:

- E. All regulations applicable to *oil, gas, or hydrocarbon wells* in this *Article (Nonconformities)* shall be found in *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*.

Sec. 17. Section 12.5.4. of Division 12.5. of Article 12 of Chapter 1A of the Los Angeles Municipal Code shall be amended to read as follows:

SEC. 12.5.4. NONCONFORMING OIL, GAS, OR HYDROCARBON WELL USE

A. Nonconforming Use Limitation of Oil, Gas, or Hydrocarbon Wells

For the purposes of this Section, all words/phrases shall be applied as defined in *Division 14.3. (Glossary)*.

1. All *oil, gas, or hydrocarbon well* sites are a nonconforming use as of the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) and shall conform to the following:
 - a. No new *oil, gas, or hydrocarbon well* for the production of oil, gas or other hydrocarbon substances may be drilled.
 - b. No existing *oil, gas, or hydrocarbon well* for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.

- c. The *oil, gas, or hydrocarbon well* site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited *oil, gas, or hydrocarbon well* activity under Suparagraph (a) and (b), or new permanent or temporary *oil, gas, or hydrocarbon well* site equipment are introduced beyond the limits of what was originally permitted.
- d. No existing *oil, gas, or hydrocarbon well* site operator or proponent shall request a modification of conditions of a discretionary zoning approval granted prior to the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233).
- e. The operation of all *oil, gas, or hydrocarbon well* sites shall cease within 20 years from the effective date of Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) at which point the use shall be deemed terminated.
- f. All *nonconforming oil, gas, or hydrocarbon well* sites shall be in strict accordance with all applicable local, state, and federal laws, regulations, rules, and standards for abandonment.
- g. If an *oil, gas, or hydrocarbon well* or *oil, gas, or hydrocarbon well* site operations are abandoned, discontinued or idled for a continuous period of one year, such well and/or use shall be deemed terminated. The *oil, gas, or hydrocarbon well* and/or use shall not be eligible for re-establishment after it has been deemed terminated.
- h. An *oil, gas, or hydrocarbon well* site operator as defined by [California Public Resources Code, Div. 3. \(Oil and Gas\), Sec. 3237](#). shall comply with the mitigation measures and mitigation monitoring program adopted with Ordinance No. _____ (Oil and Gas Drilling Ordinance per AB 3233) in the plugging and abandoning of all *oil, gas, or hydrocarbon wells*, including the decommissioning of oil well facilities.

B. Well Servicing Exception of Oil, Gas, or Hydrocarbon Wells

Repair and servicing work may be carried out on an existing *oil, gas, or hydrocarbon well* site if the scope of work does not meet the criteria for Well Maintenance.

C. Health and Safety Exception of Oil, Gas, or Hydrocarbon Wells

Otherwise prohibited activities, equipment, or changes to operations may be approved on *nonconforming oil, gas, or hydrocarbon well* sites only in order to prevent, respond to, or cease a threat to public health and safety, or the environment in accordance with procedures set forth in this Section:

1. Eligibility

- a. The Department of City Planning shall determine compliance under Administrative Review only when the following Qualifying Criteria for

Administrative Review are met. The Administrative Review process shall be conducted pursuant to *Sec. 13B.3.1. (Administrative Review)*, except *Sec. 13B.3.1.B.2. (Initiation)* and *Sec. 13B.3.1.F. (Scope of Action)* shall not apply:

- i. A scope of work that satisfies either a formal order or requirement from any local, county, state, or federal agency indicating that the proposed scope of work is required in order to satisfy compliance with a documented notice, or
 - ii. A formal, written acknowledgement from any local, county, state, or federal agency to the operator about the need to perform specific *oil, gas, or hydrocarbon well* activities and/or install new equipment in order to prevent or respond to a threat to public health, safety, and/or the environment.
- b. The *Zoning Administrator* shall determine compliance under the procedures of *Sec. 13B.2.2.H. for a Modification Procedures for a Class 2 Conditional Use Permit*, when it does not meet the Qualifying Criteria for Administrative Review in *Subparagraph a.*, above.

i. Application

- a. An *application* pursuant to this Subsection (*Nonconforming Rights Related to the Health and Safety for Oil, Gas, or Hydrocarbon Wells*) shall be filed and reviewed pursuant to the procedures of *Sec. 13B.2.2.H. (Modification Procedures)*, except the notice requirements and findings shall apply as indicated below in *Sub-subparagraphs ii. (Notice)* and *iii. (Findings)* below.

ii. Notice

- a. Notice shall be mailed to owners and occupants of all property within and outside the City within 1,500 feet of the exterior boundaries of the *oil, gas, or hydrocarbon well* site subject to the *application*.

iii. Findings

- a. The *Zoning Administrator* shall grant a use exception pursuant to *Sec. 12.5.4.A. (Nonconforming Use Limitation of Oil, Gas, or Hydrocarbon Wells)* if the following findings can be made:
 - (i) That the proposed scope of work for a legally *nonconforming oil, gas, or hydrocarbon well* site will not adversely affect any element of the General

Plan, including those which address the prevailing inequities in environmental justice.

- (ii) That the use will not be detrimental to the public health, safety, and welfare of persons residing or working in the general vicinity, and will not be detrimental or injurious to property and improvements in the surrounding neighborhood, especially those identified as disadvantaged communities, pursuant to the State of California Environmental Protection Agency Office of Environmental Health Hazard Assessment's CalEnviroScreen.
- (iii) That the use will incorporate infrastructure and safety procedures to prevent disruption and nuisance impacts related to noise, odors, transportation and circulation, and other potential negative land use impacts on the surrounding vicinity.
- (iv) That substantial evidence demonstrates the requested scope of work is necessary to prevent, respond to, or cease a credible threat to public health, safety, and/or the environment and that the scope of work will not be executed for the exclusive purpose of expanding, intensifying, or extending the duration of the *oil, gas, or hydrocarbon well* use and its operations.

D. Cessation Standards for Nonconforming Sites

The following regulations shall apply to existing *nonconforming oil, gas, or hydrocarbon well* sites within the *City* of Los Angeles, until such uses are required to cease operations pursuant to *Section 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)*:

1. All stationary drilling and service rigs, including their floors and foundations, shall be removed within 30 days after completion or abandonment of the *oil, gas, or hydrocarbon well* (notwithstanding any other provisions of this Code to the contrary).
2. The motors, engines, pumps and tanks of all such *oil, gas, or hydrocarbon 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 *oil, gas, or hydrocarbon 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 *oil, gas, or hydrocarbon wells* shall not exceed 15 feet above existing grade level.

5. The site of such *oil, gas, or hydrocarbon 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.

Sec. 18. Subparagraphs a. and b. of Paragraph 1. of Subsection H. of Section 13B.2.2. of Division 13B.2. of Article 13 of Chapter 1A of the Los Angeles Municipal Code are amended to read as follows:

H. Modification Procedures

1. Development of Site

- a. On any lot or portion of a lot on which an approved or deemed-approved conditional use is permitted pursuant to the provisions of this *Section*, new buildings or structures may be erected, enlargements may be made to existing buildings, and existing uses may be extended on an approved site, provided that plans are submitted to and approved by the *Zoning Administrator*, and, where applicable, the use is consistent with the provisions of *Chapter I. (General Provisions and Zoning), Sec. 12.24 C (Existing Uses)* or *Sec. 12.23 C.4* for lots subject to Chapter I, or *Sec. 12.5.1.E. (Use Not allowed Exceptions), Sec. 12.5.1.F. (Use Not allowed Exceptions), or Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* of this Zoning Code (Chapter 1A) for lots subject to this Chapter.
- b. The *Zoning Administrator* may deny the plans if the *Zoning Administrator* finds that the use does not conform to the purpose and intent of the findings required for a conditional use under this *Section*, or *Sec. 12.23 C.4* for lots subject to Chapter I, or *Sec. 12.5.4. (Nonconforming Oil, Gas, or Hydrocarbon Well Use)* of this Zoning Code (Chapter 1A) where applicable, and may specify the conditions under which the plans may be approved.

Sec. 19. Division 14.3. of Article 14 of Chapter 1A of the Los Angeles Municipal Code is amended to amend the following term as follows:

Oil Well Class I or A: Oil well class I or A is defined as any *Oil, Gas, or Hydrocarbon Well* drilled, conditioned arranged, used or intended to be used for the production of petroleum, natural gas or other hydrocarbon substances.

Oil, Gas, or Hydrocarbon Well: Pursuant to *Sec. 5D.9.7. (Oil, Gas, or Hydrocarbon Well)*, Oil, gas, or hydrocarbon wells are defined as 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 the Los Angeles Fire Code* except any well operated by a public utility regulated by the California Public

Utilities Commission. Oil, gas, or hydrocarbon wells shall also mean any associated facilities such as a production areas and other appurtenant structures and equipment located on the subject property/properties.

Well Maintenance: Well Maintenance is defined as any scope of work for oil, gas, or hydrocarbon substance extraction that meets either of the following two criteria: 1) A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division or 2) A scope of work that requires notification per the South Coast Air Quality Management District’s Rule 1148.2 - “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing. The term “maintain” and “maintained” shall have the same meaning and application as the definition of “Well Maintenance”.

Well Servicing: Well Servicing is defined as repair and servicing work that is carried out on existing Oil, Gas, or Hydrocarbon Well sites if the scope of work does not meet the criteria for Well Maintenance. Examples of Well Servicing may include activities such as: well pump replacement, the repair or replacement of existing underground and/or aboveground storage tanks, and repair or replacement of existing gas/oil pipelines that service the Oil, Gas, or Hydrocarbon Well operations. Well Servicing may also include the use of a workover rig to perform well pulling and efforts to retrieve tools from a well.

Sec. 20. SEVERABILITY. If any portion, subsection, sentence, clause or phrase of this Ordinance is for any reason held by a court of competent jurisdiction to be invalid, such a decision shall not affect the validity of the remaining portions of this Ordinance. The City Council hereby declares that it would have passed this Ordinance and each portion or subsection, sentence, clause, and phrase herein, irrespective of the fact that any one or more portions, subsections, sentences, clauses or phrases be declared invalid.

Sec. 21. The City Clerk shall certify to the passage of this Ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

EXHIBIT C

Council Instruction (January 2025)

Mayor's Time Stamp
CITY CLERK'S OFFICE
2025 JAN 22 PM 2:15
Mayor
CITY CLERK
BY Scott Klein
CREDITS

City Clerk's Time Stamp
CITY CLERK'S OFFICE
2025 JAN 22 PM 2:14
CITY CLERK
BY [Signature]
CREDITS

SUBJECT TO THE MAYOR'S APPROVAL

COUNCIL FILE NO. 24-1466

COUNCIL DISTRICT _____

COUNCIL APPROVAL DATE January 15, 2025

RE: THE CASE ENTITLED Oil Ordinance Litigation: Warren E&P. Inc., et al. v. City of Los Angeles, et al., Los Angeles Superior Court Case No. 23STCP00060 (Lead Case)

LAST DAY FOR MAYOR TO ACT February 3, 2025 - AS
~~January 31, 2025~~
(10 Day Charter requirement as per Charter Section 341)

DO NOT WRITE BELOW THIS LINE - FOR MAYOR USE ONLY

APPROVED

X

*DISAPPROVED

*Transmit objections in writing pursuant to Charter Section 341

DATE OF MAYOR APPROVAL OR DISAPPROVAL 01/28/2025

[Signature]
MAYOR

ITEM NO. 23

1/15/25 Council – Regular Meeting Agenda
Closed Session

MOTION

I HEREBY MOVE that the Council ADOPT the following recommendations in order to effect settlement in the case entitled Oil Ordinance Litigation: Warren E&P, Inc., et al. v. City of Los Angeles, et al., Los Angeles Superior Court Case No. 23STCP00060 (Lead Case), **SUBJECT TO THE APPROVAL OF THE MAYOR:**

1. AUTHORIZE the City Attorney to execute the attached stipulation and all other documents necessary to implement the stipulated judgment.
2. DIRECT the City Attorney’s Office to prepare all necessary documents to formally rescind Ordinance No. 187,709.
3. INSTRUCT the Department of City Planning to begin all necessary preliminary work for a new oil ordinance with an anticipated adoption sometime after January 1, 2025.

PRESENTED BY _____
JOHN LEE
Councilmember, 12th District

SECONDED BY _____
KATY YAROSLAVSKY
Councilmember, 5th District

AS 1.15.25
CF 24-1466

EXHIBIT D

**Ordinance No. 188,623 (Rescission of Oil and
Gas Drilling Ordinance No. 187,709)**

ORDINANCE NO. 188623

An ordinance rescinding Ordinance No. 187,709, which prohibited new oil and gas extraction and made existing extraction activities a nonconforming use in all zones.

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

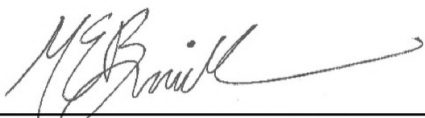
Section 1. Ordinance No. 187,709, which prohibited new oil and gas extraction and made existing extraction activities a nonconforming use in all zones, is rescinded.

Sec. 2. Upon the rescission of Ordinance No. 187,709, the amended or deleted definitions, paragraphs, subdivisions or subsections of Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter 1 of the Los Angeles Municipal Code, shall return to the same language and effect as they had prior to their amendment or deletion by Ordinance No. 187,709.

Sec. 3. The City Clerk shall certify to the passage of this ordinance and have it published in accordance with Council policy, either in a daily newspaper circulated in the City of Los Angeles or by posting for ten days in three public places in the City of Los Angeles: one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall; one copy on the bulletin board located at the Main Street entrance to the Los Angeles City Hall East; and one copy on the bulletin board located at the Temple Street entrance to the Los Angeles County Hall of Records.

Approved as to Form and Legality

HYDEE FELDSTEIN SOTO, City Attorney

By 
MARVIN BONILLA
Deputy City Attorney

Date May 5, 2025

File No. 17-0447-S2

m:\real prop_env_land use\land use\jennifer tobkin\oil litigation\council reports\r25-0221 draft ordinance (oil ordinance rescission) (final).docx

The Clerk of the City of Los Angeles hereby certifies that the foregoing ordinance was passed by the Council of the City of Los Angeles.

CITY CLERK

MAYOR





Ordinance Passed May 23, 2025

Approved 06/02/2025

Ordinance Posted: 06/06/2025
Ordinance Effective Date: 07/16/2025

EXHIBIT E

ENV-2025-2885-MND and Mitigation Monitoring Program (MMP)

MITIGATED NEGATIVE DECLARATION

Oil and Gas Drilling Ordinance



Environmental Case: ENV-2025-2885-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: All - 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 Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the 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 eliminate the provisions that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; end by-right oil and gas extraction in the M3-Heavy Industrial Zones (including in any Industrial Use District of Chapter 1A of the LAMC); and declare existing oil and gas extraction within the City a nonconforming use. Upon being deemed nonconforming, these uses will be subject to limitations, including:

1. No new Oil Well for the production of oil, gas, or other hydrocarbon substances may be drilled.
2. No existing Oil Well for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
3. The Oil Well site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited Oil Well activity under 1 and 2 above, or new permanent or temporary Oil Well site equipment are introduced beyond the limits of what was originally permitted.

The Ordinance permits otherwise prohibited activities, equipment, or changes to operations through a separate zoning process to cease a threat to 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 be required to cease operations and terminate, unless required to do so earlier due to idle status and/or inactivity.

PREPARED BY:

The City of Los Angeles
Department of City Planning

November 2025

INITIAL STUDY

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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-2025-2885-MND
Related Cases	CPC-2025-2884-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	Lilian Rubio
Address	200 N. Spring Street, Room 701 Los Angeles, California 90012
Phone Number	213-978-1840
Email	planning.oildrilling@lacity.org

Applicant	City of Los Angeles
Address	200 N. Spring Street, Room 701 Los Angeles, California 90012
Phone Number	213-978-1840

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 checked="" 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 checked="" 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.

Lilian Rubio

City Planner

PRINTED NAME

TITLE



November 26, 2025

SIGNATURE

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 Chapter 1 of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7., 5D.9.7., 8.2.4., 12.1.2., 12.5.4., 13B.2.2., and Division 14.3. 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 eliminate the provisions that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; end by-right oil and gas extraction in the M3-Heavy Industrial Zones (including in any Industrial Use District of Chapter 1A of the LAMC); and declare existing oil and gas extraction within the City a nonconforming use. Upon being deemed nonconforming, these uses will be subject to limitations, including:

1. No new Oil Well for the production of oil, gas, or other hydrocarbon substances may be drilled.
2. No existing Oil Well for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
3. The Oil Well site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited Oil Well activity under 1 and 2 above, or new permanent or temporary Oil Well site equipment are introduced beyond the limits of what was originally permitted.

The Ordinance permits otherwise prohibited activities, equipment, or changes to operations through a separate zoning process to cease a threat to 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 be required to cease operations and terminate, unless required to do so earlier due to idle status and/or inactivity.

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 relative to 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

includes an allowance for a separate zoning review to determine specific oil well site activities deemed necessary to protect public health, safety, or the environment, which may include, but are not limited to, maintenance, drilling, re-drilling, and deepening of existing production wells. The Ordinance in itself does not necessitate or compel these activities to occur; it only introduces the procedural requirements for their review, consideration, and potential approval. These limited, health- and safety-driven activities will not change existing conditions, as these activities, if necessary, would take place within the existing regulatory setting even without the Ordinance (see **Analysis & Assumptions** for further discussion). The following subsections provide a summary of the existing oil and gas extraction operations in the City and delineate the regulatory framework governing these operations. This information is based upon data and information currently available.

3.2.1 Regulatory Framework

In the City, oil and gas drilling sites and their 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 and gas operations. The following describes the primary regulatory requirements governing oil and gas extraction activities and the key agencies tasked with the oversight of oil and gas 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 developing and enforcing 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 manufacturing 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. While Section 1774 prescribes best maintenance practices, Senate Bill 1137 (SB 1137), passed in 2022, introduces an additional specific layer of protection for communities near oil and gas facilities, including existing ones, within buffer zones, from certain oil drilling activity. More specifically, SB 1137 established new safety measures to protect public health by creating buffer zones between oil and gas operations and

community spaces. The legislation created a 3,200-foot Health Protection Zone (HPZ) around homes, schools, hospitals, and other sensitive receptors. According to CalGEM mapping records, all of the oil wells in the City fall within a HPZ. Pursuant to the amended Public Resources Code sections, CalGEM cannot approve any permit within a health protection zone unless for specific exceptions, including to prevent or to respond to a threat to public health, safety, or the environment.

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. In December 2022, CARB adopted California's 2022 Scoping Plan for Achieving Carbon Neutrality (CARB's 2022 Scoping Plan). CARB's 2022 Scoping Plan establishes a path for the state to achieve carbon neutrality no later than 2045, as mandated by Assembly Bill 1279, which requires an 85 percent reduction in anthropogenic greenhouse gas (GHG) emissions below 1990 levels by that date. The plan's strategies include significant reductions in fossil fuel combustion via clean technologies, further cuts to short-lived climate pollutants, support for sustainable development, enhanced action on natural and working lands, and expanded carbon capture and storage.

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 2022 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 (2023) - "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, injection well acidizing, 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.

Southern California Association of Governments (SCAG)

On April 4, 2024, the SCAG's Regional Council adopted Connect SoCal 2024, which is the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for Southern California, a long-range plan developed by the Southern California Association of Governments (SCAG). It outlines a vision for the region through 2050, aiming to create a more resilient and equitable future by integrating transportation investments and policies with a forecasted regional development strategy. The plan considers all modes of transportation and is designed to meet federal planning factors and goals outlined in the California Transportation Plan. The ultimate goal is to guide the development and management of an intermodal transportation network while achieving significant greenhouse gas (GHG) emission reductions.

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 Codes (Chapter 1 and 1A of the Los Angeles Municipal Code (LAMC)), which references oil and gas drilling and other related activities in LAMC, Chapter 1 - Sections 12.03, 12.20, 12.23, 12.24, and 13.01; and Chapter 1A - Sections 1.4.7., 5D.9.7., 8.2.4., 12.1.2., 12.5.4., 13B.2.2., and Division 14.3.

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 properties 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 Section 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 34 Community Plan Areas. More than 87 percent of the City is developed with urban uses.

3.2.3 Existing Conditions

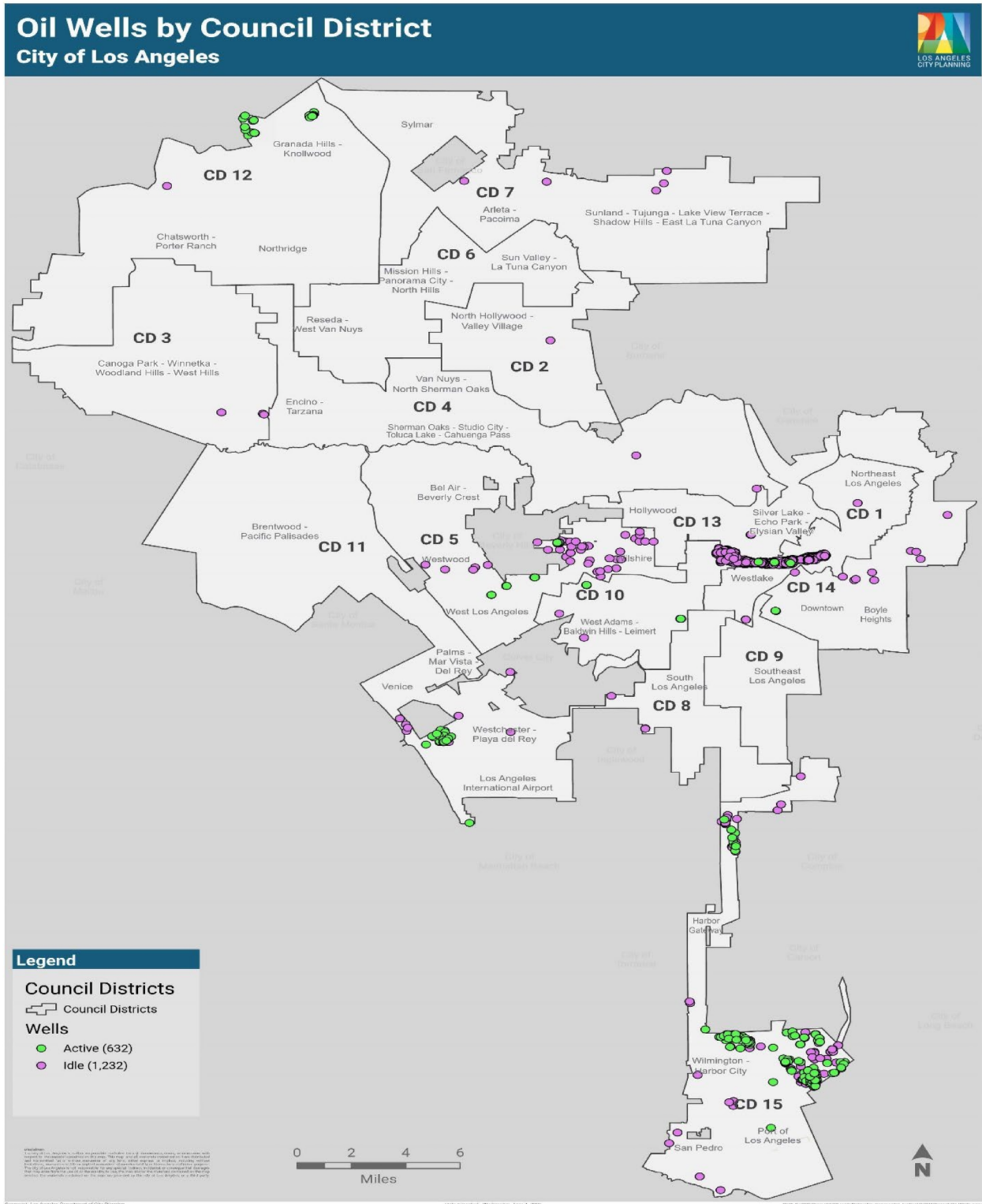
According to June 2025 data from CalGEM, the City has 28 oil and gas fields that intersect City boundaries and 5,278 oil and gas wells. There are approximately 632 active, 1,232 idle, 36 canceled, and 3,378 plugged wells.¹ There are 994 orphan wells in the City of LA, of which 889 are categorized as inaccessible (i.e. buried under buildings, etc.) and 105 categorized as accessible orphan wells that are within 50 feet of a sensitive receptor.² There are oil and gas facilities in nearly every section of the City.³ See **Figure 1, Oil Wells Within the City of Los Angeles By Council District**, 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.

¹An 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 Office of Petroleum and Natural Gas Administration and Safety Orphaned Oil and Gas Wells Report - April 2025. Available online: https://cityclerk.lacity.org/onlinedocs/2024/24-0585_misc_04-16-25.pdf, accessed August 11, 2025.

³ 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.

Figure 1
Oil Wells Within the City of Los Angeles By Council District



**Table 1
Oil Wells By Council District**

Council District	Active	Cancelled	Idle	Plugged	Total
1	2	0	619	303	924
2	0	0	1	3	4
3	0	0	3	2	5
4	0	0	2	3	5
5	131	2	67	521	721
6	0	0	0	11	11
7	0	0	5	27	32
8	0	0	4	47	51
9	0	0	0	9	9
10	82	4	72	76	234
11	30	1	10	345	386
12	41	2	5	90	138
13	10	0	207	41	258
14	5	1	32	53	91
15	331	26	205	1,847	2,409
Total	632	36	1,232	3,378	5,278

Source: City of Los Angeles, Department of City Planning and CalGEM, June 2025.

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	Canoga Park	1935	Abandoned	12
5	Cascade	1954	Producing	12
6	Cheviot Hills	1958	Producing	5
7	El Segundo	1935	Producing	11
8	Horse Meadows	1962	Abandoned	12
9	Howard Townsite	1947	Abandoned	12
10	Hyperion	1932	Abandoned	11
11	Inglewood	1924	Abandoned	5, 8, 10
12	La Cienegas	1924	Producing	1, 8, 9, 10
13	Los Angeles City	1892	Producing	1, 13
14	Los Angeles Downtown	1892	Producing	9, 14
15	Mission	1918	Abandoned	12
16	Pacoima	1974	Abandoned	6, 7
17	Playa del Rey ^a	1929	Producing	11
18	Potrero	1937	Abandoned	11
19	Rosecrans	1924	Producing	15
20	Rosecrans, South	1924	Abandoned	15
21	Salt Lake	1902	Producing	4, 5
22	Salt Lake, South	1902	Producing	4, 5, 10
23	San Vicente	1966	Producing	5
24	Sawtelle	1965	Abandoned	5, 11
25	Torrance	1922	Producing	15
26	Union Station	1892	Abandoned	14
27	Venice Beach	1929	Abandoned	11
28	Wilmington	1932	Producing	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, Department of City Planning and CalGEM, June 2025.

As shown in **Table 3A, Oil & Gas Drill Sites**, there are 74 drill sites (sites where multiple wells are concentrated) throughout the City where oil and gas operations occur. There are also eight idle drill sites in the City.⁴ The 66 remaining drill sites are dispersed throughout the City in urban and rural locations.

**Table 3A
Oil & Gas Drill Sites**

	Oil & Gas Drill Site	Council District
1	Doryon Well	1
2	Patel 1	1
3	St. James Drill Site	1
4	Beverly Hillcrest Drill Site	5
5	Rancho Park Drill Site	5
6	San Vicente Drill Site	5
7	West Pico Drill Site	5
8	Jefferson Drill Site	8
9	Fourth Avenue Drill Site	10
10	Murphy Drill Site	10
11	Packard Drill Site	10
12	Lower Area	11
13	Title Insurance Trust	11
14	Upper Area	11
15	Cascade Oil Field	12
16	Ff-35A	12

⁴ City of Los Angeles, Department of City Planning and CalGEM, June 2025.

17	Ma 5 Wellsite/Relief Knockout Tank	12
18	Mcalmond Lease	13
19	Broadway Drill Site	14
20	Andon Tank Farm	15
21	Bank Lease Tank Farm	15
22	Between 1386 and 1418 Oakhorne Drive	15
23	Between 23412 and 23528 President Ave	15
24	Brea Canon JU 3G	15
25	Brown & Bevis Lease	15
26	C-105, Palm Breeze Lane	15
27	C-108, Lighthouse Dr.	15
28	C & S Lease	15
29	Capital 71	15
30	Capital Lease Tank Setting	15
31	Capital Lease Tanks	15
32	Capital Tank Setting	15
33	Central Facility	15
34	Coast Line B Tank Setting	15
35	Conway 1 Tank Facility	15
36	Drill Site A4	15
37	Ferrell Lease Tanks	15
38	Figuera Lease	15
39	G Lease	15
40	G Lease Tanks	15

41	Girtin Lease	15
42	Girtin Lease Tanks	15
43	Halo #4 Lease	15
44	Howard Park Lease	15
45	J-1 Lease	15
46	Josephine/Frampton Ave. Setting	15
47	Joughin Unit Tank Farm	15
48	JU 6, NW Corner Normandie/Oakheath	15
49	Leith/Sutherland	15
50	Mahar Lease	15
51	Midge Lease	15
52	Nance Blinn Setting	15
53	North End of 760 West Lomita	15
54	Rosecrans 1-2 Tank Farm	15
55	Salter Lease Tanks	15
56	South Torrance Unit Tank Farm	15
57	South Torrance Unit Well Testers	15
58	Spring Lease Tanks (103976)	15
59	Spring Lease Tanks (47046)	15
60	Spring Lease Tanks (47047)	15
61	Spring Tank Setting	15
62	Sterling #1	15
63	Sterling #29-#30	15
64	Stone Lease Tank Setting	15

65	STU equipment storage	15
66	United Lease	15
67	Wallace Lease Tanks (47043)	15
68	Warren Lease	15
69	Watson B Lease	15
70	Well 12-C Setting	15
71	Westport Lease	15
72	Whitelaw Tank Setting	15
73	Wilmington Townlot Unit	15
74	Woodbury Drive drill site	15

Source: City of Los Angeles, Department of City Planning and CalGEM, June 2025.

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 605 wells are within 50 feet and 1,015 wells are within 100 feet of sensitive land uses identified as residences, schools, parks, daycares, nursing homes, or hospitals. With respect to the wells located in proximity to residences, the mapping identified wells near parcels with existing residential zoning and uses. 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).⁵ 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.⁶ Oil and gas production in the City

⁵ City of Los Angeles, Department of Public Works Office of the Petroleum and Natural Gas Administration and Safety. Oil and Gas Health Report, 2019. https://cityclerk.lacity.org/onlinedocs/2017/17-0447_pc_b_10-15-19.pdf, accessed August 11, 2025.

⁶ David Rigby and Michael Shin. The Oil and Gas Extraction Sector in the City of Los Angeles. October 2017. Available online at: https://cityclerk.lacity.org/onlinedocs/2017/17-0447_misc_81A_07-29-2019.pdf, accessed August 11, 2025.

represents approximately two percent of the State's total production.⁷

Current production data records provided by CalGEM reflect a trending decline in total oil production in the City. There has also not been a land use approval to drill a new well in the City since 2014. As shown below in **Table 3B, Oil Production in the City**, the City's oil production has decreased from 2018 to 2024. State data on oil production illustrates that in 2018, the total oil production amounted to 2.1 million barrels (bbl) of oil. In 2022, that decreased below two million to an approximate amount to 1.8 million barrels (bbl) of oil. In 2024, the total oil production volume decreased to 1.6 million barrels (bbl) of oil. Based on the 2024 oil production volume, the City's share of statewide oil production is approximately 1.4 percent. The decline in the City's oil production corresponds to a statewide decline in oil production. In 2017, the state produced over 174 million barrels (bbl) of oil. As of 2024, oil production across the state decreased to 113 million barrels (bbl) of oil.

Table 3B
Oil Production in the City

Year	Production Volume (bbl/oil)
2018	2.1 million
2019	2.2 million
2020	2.1 million
2021	2 million
2022	1.8 million
2023	1.7 million
2024	1.6 million

Source: CalGEM 2024 data on oil production volume.

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

⁷ City of Los Angeles, Office of Petroleum and Natural Gas Administration & Safety. Oil & Gas Health Report. 2019. Available online at: https://cityclerk.lacity.org/onlinedocs/2017/17-0447_pc_b_10-15-19.pdf, accessed August 11, 2025.

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.⁸

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 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 ratio⁹ 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 ratio¹⁰ 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

⁸ 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.

⁹ The gas to oil ratio is a measure of the natural gas content in the produced fluid from the formation.

¹⁰ The water to oil ratio is a measure of the water content in the production fluid.

national and statewide efforts to become energy efficient and independent led to a 2017 motion (CF-17-0447)¹¹ from 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 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 risks 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, 2022,¹² 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. Pursuant to the City Council directive, DCP drafted a proposed citywide Oil and Gas Drilling Ordinance No. 187,709 (Oil Ordinance No. 187,709), which was adopted by the City Council on December 2, 2022 (Council File No. 17-0447-S2). Ordinance No. 187,709, which prohibited new oil and gas extraction and made existing extraction activities a nonconforming use in all zones, became effective on January 18, 2023. To support the implementation of Ordinance No. 187,709, DCP's Office of Office of Zoning Administration (OZA) prepared a Zoning Administrator's Interpretation

¹¹ City of Los Angeles Department of City Planning, Health, Mental Health, and Education Committee. Motion CF- 17-0447. August 2017. Available online: https://cityclerk.lacity.org/onlinedocs/2017/17-0447_mot_04-19-2017.pdf, accessed August 11, 2025.

¹² City of Los Angeles. Budget and Finance Committee Report. November 2021. File No. 17-0447. Available online: [https://cityclerk.lacity.org/onlinedocs/2017/17-0447_misc_BF_112221_vF3%20\(2\).pdf](https://cityclerk.lacity.org/onlinedocs/2017/17-0447_misc_BF_112221_vF3%20(2).pdf), accessed August 11, 2025.

(ZAI) clarifying “well maintenance” and a Zoning Administrator (ZA) Memo No. 141, outlining the Health and Safety Exception application process administered by the OZA, to address public health, safety, or environmental threats. The validity of Oil Ordinance No. 187,709, the ZAI, and ZA Memo No. 141 were litigated, and the Court ruled that state law preempts local municipalities from regulating how oil and gas extraction happens. On September 25, 2024, after the court issued its preemption ruling in the Warren litigation, Governor Newsom signed into law Assembly Bill (AB) 3233, which added Section 3106.1 to the Public Resources Code, allowing local governments to enact and enforce “limitations or prohibitions related to the methods of oil and gas operations or development and the locations of oil and gas operations or development” - notwithstanding any state approval or permit. The Legislature’s intent in passing AB 3233 is stated in the bill text: Protecting public health, safety, and the environment is of the utmost importance to all Californians... Empowering cities and counties to regulate, limit, or prohibit oil and gas operations in their jurisdictions will therefore enable communities to make decisions that align with their needs.” AB 3233 became effective on January 1, 2025. On January 15, 2025, the City Council, acting on the City Attorney’s recommendation, approved entering into a stipulated judgment to take steps to rescind Oil Ordinance No. 187,709, along with its supporting implementation documents, the ZAI and ZA Memo No. 141 (Council File No. 24-1466), while preserving the City’s right to enact future oil and gas regulations in light of AB 3233. In January 2025, the City Council also adopted a motion directing the Department of Planning to prepare for the adoption of the Oil and Gas Drilling Ordinance under the authority granted by AB 3233. On May 23, 2025, the City Council acted to rescind Ordinance No. 187,709. On May 29, 2025, the OZA rescinded the ZAI and ZA Memo No. 141. The Mayor’s concurrence and approval of the rescission of Ordinance No. 187,709 was executed on June 2, 2025 (Ordinance No. 188,623; Council File No. 17-0447-S2). The rescission of Ordinance No. 187,709 led to the return of pre-existing oil regulations in the LAMC.

Another notable state legislation which became effective on June 28, 2024, was Senate Bill (SB) 1137. SB 1137 was signed by Governor Newsom on September 16, 2022, however, it was temporarily paused due to a potential ballot initiative that would have invalidated SB 1137. After the ballot initiative was withdrawn, SB 1137 became effective. CalGEM resumed implementation of the new regulations, including a prohibition on new drilling, deepening, and rework permits if the oil well is within 3,200-feet of a sensitive receptor. SB 1137 contains clear language that CalGEM can issue permits if the oil well activity is necessary to prevent or respond to a threat to public health, safety, or the environment. CalGEM is determining on a case-by-case basis if a scope of work meets the criteria for such a health and safety exception. Like AB 3233, SB 1137 underscores the Legislature’s recognition that oil and gas operations near sensitive receptors pose heightened risks. Together, AB 3233 and SB 1137 illustrate a growing legislative trend toward regulating or restricting oil and gas operations that present potential health and safety risks, providing important context for the City’s continued role in oil regulation.

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 Council File No. 17-0447, 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 parks.¹³ Consistent with the City’s policies on climate change (i.e., L.A.’s Green New Deal, Sustainable City pLAN,¹⁴ and the City’s Health, Wellness and Equity Element of the General Plan “Plan for a Healthy Los Angeles”¹⁵), 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.

¹³ 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.

¹⁴ Available on the City’s website at: https://plan.mayor.lacity.gov/sites/g/files/wph2176/files/2022-12/pLAN_2019_final.pdf

¹⁵ Available on the City’s website at: https://planning.lacity.gov/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf

	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.
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.
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
LA100	Comprehensive, scientific study conducted by the National Renewable Energy Laboratory (NREL) and the Los Angeles Department of Water and Power (LADWP) that analyzed pathways for Los Angeles to achieve its goal of a 100% renewable energy power system by 2045. Serves as a foundational scientific and technical analysis that informs and guides local policy for the city's transition to a 100% renewable energy and carbon-free electricity by 2045.
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)

Downtown Community Plan	LU 17.9 Support local, regional, state, and federal programs seeking to reduce greenhouse gas emissions, in an effort to minimize pollution sources and to improve air quality.
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)
	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	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
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	
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 renewable 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's Connect SoCal 2024 (2024-2050 RTP/SCS)	Environment Policy 49 - Support communities across the region to advance innovative sustainable development practices
	Environment Policy 50 - Recognize and support the diversity of communities across the region by promoting local place-making, planning and development efforts that advance equity, mobility, resilience and sustainability
	Environment Policy 51 - Reduce hazardous air pollutants and greenhouse gas emissions and improve air quality throughout the region through planning and implementation efforts
	Environment Policy 53 - Reduce the exposure and impacts of emissions and pollutants and promote local and regional efforts that improve air quality for vulnerable

	<p>populations, including but not limited to Priority Equity Communities and the AB 617 Communities</p> <p>Environment Policy 64 - Prioritize the most vulnerable populations and communities subject to climate hazards to help the people, places and infrastructure that are most at risk for climate change impacts. In doing so, recognize that disadvantaged communities are often overburdened</p> <p>Environment Policy 65 - Support local and regional climate and hazard planning and implementation efforts for transportation, land use, and other factors</p>
SCAQMD AQMP 2022	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	Achieve carbon neutrality no later than 2045
	Reduce GHG emissions by 85 percent
	Reduce petroleum use by 94 percent
	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's Connect SoCal 2024 (2024-2050 RTP/SCS)	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 Chapter I of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC to prohibit new oil and gas extraction and make existing extraction activities a nonconforming use in all zones within the City. Specifically, the Ordinance amends the LAMC to eliminate the provisions that allow for the creation of new “O” Oil Drilling Supplemental Use Districts; end by-right oil and gas extraction in the M3-Heavy Industrial Zones (including in any Industrial Use District of Chapter 1A of the LAMC); and declare existing oil and gas extraction within the City a nonconforming use. Upon being deemed nonconforming, these uses will be subject to limitations, including:

1. No new Oil Well for the production of oil, gas, or other hydrocarbon substances may be drilled.
2. No existing Oil Well for the production of oil, gas, or other hydrocarbon substances shall be maintained, drilled, re-drilled, or deepened.
3. The Oil Well site and its operations and equipment shall not be expanded or extended in any way, or intensified such that prohibited Oil Well activity under 1 and 2 above, or new permanent or temporary Oil Well site equipment are introduced beyond the limits of what was originally permitted.

The Ordinance permits otherwise prohibited activities, equipment, or changes to operations through a separate zoning review process to cease a threat to public health, safety, or the environment. Twenty years from the effective date of the Ordinance, all nonconforming non-exempt oil and gas extraction uses (excluding public utility wells) will be required to cease operations and terminate, unless required to do so earlier due to idle status and/or inactivity.

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 production and injection wells verified as 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 suitably restored for subsequent use, and (5) any well or gas storage facility 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 well closure and abandonment, nor does it regulate the abandonment of oil and gas wells that have permanently ceased operation, or mandate or regulate the remediation of well sites where extraction has permanently terminated (except where mitigation measures are required to reduce identified potentially significant impacts).¹⁶

3.3.2 Analysis & Assumptions

The Ordinance will designate existing oil and gas drilling operations within the City as legally nonconforming uses, subject to a 20-year phase-out period. This 20-year period was prescribed by Ordinance No. 99,923 in 1952 within the existing nonconforming use section of the LAMC (Section 12.23 C.4). As such, this Ordinance is utilizing a pre-existing timeframe that is well established and specific to the use of oil and gas within the City's Zoning Code. Existing oil and gas extraction activities and operations must cease prior to or no later than the conclusion of the phase-out period, unless operations are abandoned, discontinued, or idled for a continuous period of one year at which point use shall be deemed terminated. Upon the cessation of well operations, existing regulations mandate plugging and abandonment processes via various local, state, and federal regulations. However, existing regulations do not specify a timeframe for completing the abandonment process once a well ceases operation. As stated above, the Ordinance itself does not introduce new regulations concerning the timing of abandonment for wells that permanently cease operation. During the 20-year phase-out period, wells are expected to continue extracting oil and undergo routine operations, including well servicing and maintenance, similar to existing conditions and historical operations. Based upon data and information currently available, the most common well maintenance activities that take place within the existing environmental setting include well re-casing (a form of repair work, involving changing out the casing of an existing well) and maintenance acidization (cleaning and descaling a well using chemicals and solvents). These activities are short-term and intermittent in nature and occur on an as-needed basis. Currently, these

¹⁶ 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.

maintenance activities have been reviewed on a case-by-case basis, and operators have been informed that these activities require discretionary review and approval under LAMC Section 13.01 H. The likelihood of these activities occurring does not increase as a result of the Ordinance, as the Ordinance does not require any change to these regular and pre-existing operations.

However, to ensure the phase-out is realized, the Ordinance prohibits the expansion, extension, or intensification of the use unless otherwise reviewed and approved by the City under an exception with additional procedural requirements and findings. The Ordinance only allows for limited exceptions when this activity is deemed necessary through a separate zoning review process to prevent or address a threat to public health and safety. It would be speculative to estimate how frequently specific oil operators will seek to conduct such activities under the new regulations which require heightened findings affirming that the scope of work is not for the exclusive purpose of expanding, intensifying, or extending the duration of the Oil Well site and its operations. Nonetheless, any specific health and safety-related work would require case-by-case zoning review and CEQA analysis.

It should be noted that the Ordinance's health and safety exception aligns with existing state regulations and procedures that provide oversight over certain oil drilling activities that have the potential to adversely affect public health, safety, and/or the environment. Under Senate Bill 1137 (2022), CalGEM is prohibited from issuing drilling, re-drilling, or rework oil well permits unless it is to prevent or to respond to a threat to public health, safety, or the environment. SCAQMD Rule 1148.2 requires certain activity including maintenance acidizing to be reported to SCAQMD and that notice be provided to the public before any such work commences. As with work that may be approved through the Ordinance's limited health and safety exceptions, these state regulations are intended to sustain the environment at conditions not harmful to public health and safety.

Based upon the above, the Ordinance is not anticipated to alter the environmental baseline during the phase out period related to servicing and maintenance activities, including those that may expand or intensify the use.

The baseline conditions may change based on the permanent ceasing of oil well operations and the activities to abandon the oil well. However, 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 1,864 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, while others may continue to operate until the end of the 20-year phase-out 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 plugging 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 by the proposed law. 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 permanently stops operating, 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. The oil well abandonment process should not require excavation of previously undisturbed land and no new permanent structures would be constructed when a well is abandoned.

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.¹⁷ Well equipment

¹⁷ 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.

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.¹⁸ 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 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 at 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

¹⁸ California Geologic Energy Management Division "OG 100" and "OG 103" Forms related to Plug and Abandonment Activities (2019-2021) for Wells at the Jefferson Drill Site formerly operated by Sentinel Peak Resources, Inc.

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. Almost any redevelopment would require future legislative action to rezone or redesignate the land use and would be driven by future market conditions and individual decisions of the current or future property owners. 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 that 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 phase-out period.

Additionally, the project is not modifying any 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 (Appendix A) and the Noise and Vibration Technical Report (Appendix B), which are included as appendices to this Initial Study. The technical reports were completed in September 2022 and necessary clarification is outlined herein to ensure the analysis is based on the most updated information. The following data and policy have changed since the original analysis:

- 1) Project Description Clarification: Portions of the project description were updated to ensure alignment with the proposed version of the Ordinance;
- 2) Inventory Data Integration: The analysis integrated the most recent inventory data from June 2025 for existing oil and gas well operations, showing a decrease in the total number of wells subject to phase-out. This change reinforces the original technical finding by reducing the total cumulative burden (short-term abandonment impact and long-term avoided emissions), confirming that no adverse impact increase is expected;
- 3) Regional Planning Document Updates: The consistency analysis was updated to reflect the most current regional planning documents from the Southern California Association of Governments (SCAG) and the South Coast Air Quality Management District (SCAQMD), including reference to SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the 2022 Air Quality Management Plan (AQMP). These updated regional policy documents set more aggressive reduction goals and stronger regulatory policies; and,
- 4) Sensitive Receptors: The list of sensitive receptors located in proximity to wells throughout the City, as provided in Appendix A and B, may have fluctuated since September 2022, but the conclusions and recommendations of the technical studies are still accurate and relevant for evaluating localized impacts. Based upon the information currently available to the City, approximately 605 wells are within 50 feet and approximately 1,015 wells are within 100 feet of sensitive land uses (e.g., residences, schools, parks, daycares, nursing homes, or hospitals).

Furthermore, this analysis is consistent with the strategic direction set by the California Air Resources Board (CARB) 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). This plan identifies a path to achieve carbon neutrality by 2045 or earlier, maintains the goal of reducing greenhouse gas (GHG) emissions by at least 40 percent below 1990 levels by 2030, focuses on strategies for reducing California's dependency on petroleum to provide clean energy options, and integrates equity and protecting California's most impacted communities as a driving principle. The proposed Ordinance directly supports these goals by mandating the phase-out of fossil fuel extraction within the City, thereby removing long-term emission sources and eliminating incompatible land uses in predominantly overburdened, frontline communities.

Notwithstanding the necessary technical updates as indicated here and throughout this document, the detailed assumptions and reasonably foreseeable environmental impacts resulting from the adoption and implementation of the proposed Ordinance are valid. The core conclusion – that short-term abandonment impacts are less than significant or mitigated, and long-term impacts are beneficial due to the cessation of production – remains unchanged, confirming the continued validity of the environmental conclusions regarding Air Quality, Greenhouse Gas, Noise and Vibration impacts.

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 Chapter 1A Section 13.B.1.3, 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
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 phase-out 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 most sites will experience no visible change as a result of the Project. In addition, abandonment activities, while potentially occurring, will not introduce significant physical alterations to scenic vistas as these activities do not involve the construction of any new

structures which could obstruct views or otherwise negatively impact visual quality. Any abandonment activities would be temporarily occurring over the course of a few days or weeks at most sites, ensuring no permanent alteration to any scenic vista. Further, the Oil Ordinance's prohibition on new oil and drilling activities citywide will prevent the installation of permanent additional facilities that could be visible from a scenic vista, such as industrial structures, fences, and equipment. While the Ordinance allows for health and safety-driven activity and equipment under the exception, these activities would be speculative at this time and in any case are not anticipated to change baseline conditions as discussed above. As such, there will be no reasonably foreseeable impacts resulting from the Ordinance.

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.¹⁹ There are 1,177 wells within a half mile of radius of Scenic Highways in the City of Los Angeles. Out of these wells, 188 are Active Wells, and 989 are inactive and/or idle wells.²⁰

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 for the production of oil, gas, or other hydrocarbon substances and the redrilling of existing wells which will prevent the installation of new facilities within these areas preventing the possibility of future impacts. While the Ordinance allows for health and safety-driven activity and equipment under the exception, these activities would be speculative at this time and in any case are not anticipated to change baseline conditions as discussed above. Further, activities

¹⁹ California Scenic Highway Mapping System, available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed June 2, 2025.

²⁰ Caltrans, California Scenic Highway System Map, available at: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed June 2, 2025.

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. Thus, no reasonably foreseeable 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 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.²¹ 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 be permitted. While the Ordinance allows for health and safety-driven activity and equipment under the exception, these activities would be speculative at this time and in any case are not anticipated to change baseline conditions as discussed above. As such, no reasonably foreseeable 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

²¹ 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

glare, as none of the conditions described above would occur. Light sources during the phase out period are expected to remain the same as existing conditions. 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.

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:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| <p>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?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>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))?</p> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| <p>d. Result in the loss of forest land or conversion of forest land to non-forest use?</p> | <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*, dated September 2022 and included as **Appendix A** to this Initial Study. **Appendix A** established the foundational assumptions and methodology for this analysis. The core assumptions and impact analyses for Air Quality remain valid because the foreseeable effects of the project – the elimination of continuous, fugitive emissions from fossil fuel production – is unchanged relative to the air quality thresholds. While this Initial Study integrates updated information, these updates serve to validate and reinforce the initial conclusions of **Appendix A**. These updates include, but are not limited to, the project description, the most recent well inventory data from June 2025, and the use of new regional planning documents. The new regional planning documents include SCAG’s 2024–2052 RTP/SCS, the 2022 AQMP, and the 2022 Scoping Plan. As such, the initial conclusions of **Appendix A** remain valid and include, but are not limited to, that the permanent decrease in potential operational emissions resulting from the Ordinance is considered to have a positive impact on the air basin’s attainment of criteria pollutants. The methodology (using tools like CalEEMod) and the conclusions in **Appendix A**, continue to form the basis of the air quality findings presented in this document. Additionally, as described in the checklist questions below, the air quality analysis in **Appendix A**, established the framework that the Project’s short-term abandonment activities result in temporary, one-time criteria pollutant emissions, and that the long-term effect is a significant beneficial impact, avoiding criteria air pollutant emissions per year upon abandonment of all subject wells, primarily from eliminating fugitive emissions. This Initial Study incorporates updated information and context to confirm these conclusions. The overall long-term finding – that the Ordinance results in a reduction in criteria pollutant emissions and is consistent with applicable regional air quality plans – remains valid. As such, 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 this Initial Study and **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?

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?

c. Expose sensitive receptors to substantial pollutant concentrations?

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

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

Less than Significant Impact.

The proposed Ordinance demonstrates consistency with applicable air quality plans by aligning with federal and state mandates for emissions reduction and air quality attainment. 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 2022 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).²² The plan's pollutant control strategies are based on SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The initial technical analysis found in Appendix A (September 2022) was prepared when the currently adopted air quality plan was the 2016 AQMP and the relevant planning document was SCAG's 2016-2035 RTP/SCS. This Initial Study's consistency analysis now relies on the 2022 AQMP and SCAG's 2024–2052 RTP/SCS to ensure the Project is evaluated against the most current policy documents.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section

²² South Coast Air Quality Management District. 2022. *Air Quality Management Plan*. Available online at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edceb61_16, accessed June 17, 2025.

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 the first criterion.

With respect to Consistency Criterion No. 2, the 2022 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 projections in the AQMP for achieving air quality goals are now based on assumptions in SCAG's 2024-2054 RTP/SCS regarding population, housing, and growth trends, superseding the previously cited 2020-2045 RTP/SCS in **Appendix A**. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) Project mitigation measures; and (3) appropriate incorporation of AQMP control measures.

The Ordinance would not result in any changes to housing or population forecasts for the City or the region as a whole because it does not involve any amendments to land use designations or zoning except for making oil and gas uses non-conforming. During the phase-out period, the Ordinance requires operations to continue under current permits and regulations, ensuring the operational intensity and emissions do not increase above the current baseline. Additionally, any abandonment of an oil or gas well as a result of the Ordinance, would be consistent with AQMP control measures. Therefore, the Ordinance would not exceed the assumptions utilized to develop the 2022 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 considered 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.

During the phase-out period, ongoing operational activities are expected to continue at the existing level, and as such, no new or increased environmental impacts while wells are still operational are anticipated.

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.²³ 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.²⁴ 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.²⁵

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 NOx), PM10, and PM2.5. The methodology and assumptions used to calculate these

²³ 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.

²⁴ California Geologic Energy Management Division "OG 100" and "OG 103" Forms related to Plug and Abandonment Activities (2019-2021) for Wells at the Jefferson Drill Site formerly operated by Sentinel Peak Resources, Inc.

²⁵ California Geologic Energy Management Division "OG 100" and "OG 103" Forms related to Plug and Abandonment Activities (2019-2021) for Wells at the Jefferson Drill Site formerly operated by Sentinel Peak Resources, Inc.

short-term emissions remain valid and are relied upon for the environmental conclusion as the thresholds for air quality remain the same, advanced emissions control technologies for trucks and construction machinery continue to improve, and the emissions projections are below current thresholds. 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 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 related to short term or temporary air quality emissions and this impact is less than significant.

For context, it is unlikely that there would be an occasion where there would be 19 separate well abandonments in a day in the City. Simply put, there is insufficient capacity to carry out 19 separate well abandonments for a variety of basic reasons. First, LAFD and CalGEM inspectors have specific staff that perform in-person monitoring for the well abandonment activities. It would be challenging for inspectors to perform many inspections in a given day and may not even permit operators from carrying out work if said well abandonment work cannot be safely monitored by the responsible LAFD and CalGEM staff. Second, there is a limited availability of workover rigs that are required to complete the numerous steps involved in the plugging and abandonment activities. Operators are mindful that they are contracting out to oilfield service companies that also have clients in the County of Los Angeles, Orange County, Ventura County, Kern County and Santa Barbara County, among other areas of California. And finally, well abandonment activities entail the use of cement trucks for various plugging steps during the abandonment process. The availability of cement trucks varies with competing construction projects occurring across the City on a given day. It would be difficult for cement trucks to have the volume and staffing necessary to be present at 19 different well abandonment projects.

For the reasons discussed above, it is unlikely that more than 19 wells will be abandoned concurrently. However, if in the event more than 19 wells are abandoned at the same time, Mitigation Measure AQ-1 (MM AQ-1) requiring the use of Tier 4 engines would reduce air quality emissions during abandonment, further protecting public health. As shown in **Table 7** below, MM AQ-1 would serve to substantially reduce air quality emissions during abandonment, including particulate matter exhaust emissions. Specifically, particulate matter exhaust emissions would be reduced by approximately 68%. Tier 4 engines are currently in use on many construction sites and as older equipment is phased out over the 20-year phase-out period, Tier 4 equipment will be more readily available for use during abandonment of wells. Furthermore, the use of Tier 4 engines is considered feasible and it has been included for many projects in the City and throughout the state. The SCAQMD has also recommended projects use Tier 4 equipment to reduce air quality emissions from off-road sources.

Mitigation Measure

MM AQ-1 Emissions Standards for Off-Road Construction Equipment Greater than 50 Horsepower. All off-road diesel-powered construction equipment equal to or greater than 50 horsepower shall meet the U.S. Environmental Protection Agency's

(USEPA) Tier 4 Final emission standards, or highest possible standard, during abandonment of wells. Operators shall maintain records of all off-road equipment to document that each piece of equipment used meets these emissions standards.

**Table 7
Oil & Gas Well Abandonment Emissions (Per Well) – Pounds Per Day –
With Tier 4 Equipment**

Source	ROG	NOx	CO	SO ₂	PM10	PM2.5
Off-Road Equipment Emissions (Tier 4)	0.26	1.89	5.75	0.01	0.06	0.06
Off-Road Equipment Emissions (Draft IS/MND)	0.51	4.69	5.79	0.01	0.19	0.17
Emissions Reduction Due to Tier 4 (%)	49%	60%	0.7%	0%	68%	65%

Source: Impact Sciences, November 2022. See Attachment 1 to this Initial Study for calculation data.

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 ROGs (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.²⁶ Nevertheless, **Table 8, 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.²⁷ 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 8** 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 related to long term air quality emissions and this impact is less than significant.

Table 8
Avoided Oil & Gas Air Quality Emissions – Pounds per Day

Source	ROG	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
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

²⁶ Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

²⁷ See **Appendix A** to this Initial Study for further information related to calculations and assumptions utilized to prepare these estimates.

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.²⁸ The LSTs applicable to the Ordinance are presented in Table 8 of the Project's *Air Quality and GHG Technical Report* (see **Appendix A** to this Initial Study), which consolidates the most restrictive thresholds for all City SRAs for 1-acre site with receptors located at 25 meters. 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 9, 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.

**Table 9
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

²⁸ 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.

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 workdays. 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 five minutes, which would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions.²⁹ 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.

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, these operations include production, injection, servicing and maintenance of oil wells. Current operations, which are not anticipated to increase as a result of the proposed Ordinance, have a continued adverse effect today and contribute significantly to the production of emissions. 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.

While the Ordinance allows for health and safety-driven activity and equipment under the exception, these activities would be speculative at this time and in any case are not anticipated to change baseline conditions as discussed above.

An odor "event" is generally considered a scenario where odors are released and

²⁹ California Air Resources Board. 2022. *Frequently Asked Questions Regulation for In-Use Off-Road Diesel- Fueled (Off-Road Regulation)*. Available online at: <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>, accessed June 2, 2025.

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, 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. Furthermore, operators must comply with SCAQMD Rule 1148.2, which requires electronic notification prior to the start of well work, allowing the agency to proactively oversee activities that could generate odors. 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
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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?

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 phase-out period. There is one active well located within a Significant Ecological Area (SEA) that would be subject to the Ordinance.³⁰ The majority of well sites are disturbed, developed industrial parcels. Inactive and abandoned wells, including the single well in the SEA once it ceases operation, are required to comply with LAFD regulations regarding brush clearance and other general maintenance. These requirements make these well sites unlikely to provide significant, undisturbed habitat for candidate, sensitive, or special status species. Therefore, threatened, endangered, protected and sensitive species and habitats are not anticipated to be affected at these sites. Short-term abandonment activities, including those at the active well, 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. All activities during the phase-out period, including maintenance and abandonment, are subject to existing federal, state, and local regulations designed to protect biological resources, including but not limited to: 1) the federal Migratory Bird Treaty Act (MBTA), which protects migratory birds and their nests, 2) the California Endangered Species Act (CESA), which regulates activities that may result in the “take” of state-listed species, 3) the applicable California Department of Fish and Wildlife (CDFW) codes, and 4) the applicable City of Los Angeles Protected Tree and Shrub Regulations (Ordinance No. 186,873). As such, the Ordinance would have less than significant impacts related to this biological impact area.

Notwithstanding the impacts are less than significant, the City is adopting Mitigation Measure BIO-1 (MM BIO-1). MM BIO-1 will require a biological survey and plan for any

³⁰ City of Los Angeles GeoHub, Significant Ecological Area (SEA), 2025.

well site located within a Potential Habitat Area, as identified on the City's Planning and Zoning Maps as "Protected Area for Wildlife (PAWs)".

Mitigation Measure

MM BIO-1 Survey and Plan for Potential Habitats. Any well site located within a Potential Habitat Area, as identified on the City's Planning and Zoning Maps, such as areas mapped as "Protected Area for Wildlife (PAWs)", shall require a biological survey and report by a Qualified Biologist prior to any major decommissioning or abandonment activity that involves ground disturbance or vegetation removal outside of the immediate well pad area. If the survey identifies potential habitat for sensitive species, the operator shall prepare and implement a Biological Resources Management Plan, which shall include measures such as, but not limited to pre-construction surveys, worker environmental awareness training, and establishing avoidance buffer zones and seasonal restrictions where sensitive natural communities or riparian habitat are identified in compliance with all state and federal regulations (e.g., establishing bird nesting buffers as required by the MBTA), to ensure activities adhere to high standards of environmental protection.

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.

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 there is only one active well located within a SEA that would be subject to the Ordinance, 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. As such, the Ordinance would have less than significant impacts related to this biological impact area.

Notwithstanding the impacts are less than significant, the City is adopting MM BIO-1. MM BIO-1 would require a biological survey and plan for any well site located within a Potential Habitat Area, as identified on the City's Planning and Zoning Maps as "Protected Area for Wildlife (PAWs)".

- 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 and ongoing operations during phase out period 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. There are active and idle wells located near SEAs, including the Harbor Regional Park (Bayou Wetlands), the Ballona Wetlands, and the Santa Susana Mountains near the Aliso Canyon/Porter Ranch area of the City of Los Angeles. Due to the strict limitation of activities to previously disturbed wells, impacts to protected wetlands and riparian habitat 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, which, regardless, would be protected under Federal and State law as discussed under a). 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*). It is not reasonably foreseeable during the phase out period that ongoing operations would require the removal of trees or shrubs that would potentially conflict with the City's tree preservation policies and ordinance. 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. 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
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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"/> |
| 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 *State CEQA Guidelines* §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 phase-out period. The Ordinance also introduces a health and safety-driven exception through a separate zoning review, but it would be speculative at this time to predict and analyze whether any new equipment or activity may be proposed or authorized through said process. 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.³¹ 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;
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 the National Register, California Register, and local listing or designation as a historic resource. Seven 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

³¹ CEQA Guidelines §15064.5(a)(3).

Wells, the Los Angeles Downtown Oil Wells, the 23rd Street - St. James Place Oil Wells (Allenco Drill Site), the San Vicente Drill Site, the Wilmington Oil Field, and the Belmont Avenue pumpjacks. These are sites where oil operations are either currently occurring or have occurred in the past that may have historical significance for the City. According to CalGEM, the Belmont Avenue Oil Pumpjacks site remains an active oil extraction operation while nearly all of the oil wells in the Wilmington Oil Field Historic District have been plugged and abandoned. 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.^{32,33,34} In addition, the Ordinance and any associated abandonment activities will not require demolition or substantial alterations of existing 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. While it may be possible for some oil operators or land owners to seek subsequent approvals to redevelop some well sites, the extent of this potential redevelopment is currently unknown and any analysis of the number and extent of specific approvals under future land uses is speculative at this time. Further, while the Ordinance does not compel redevelopment, 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

³² National Park Service. National Register of Historic Places. Available online at: <https://www.nps.gov/subjects/nationalregister/database-research.htm>, accessed August 1, 2025.

³³ California Office of Historic Preservation. California Historical Resources. Available online at: <https://ohp.parks.ca.gov/ListedResources/>, accessed August 1, 2025.

³⁴ City of Los Angeles. Los Angeles Historic Resources Inventory. Available online at: <http://historicplacesla.org/search>, accessed August 1, 2025.

resources are unlikely to be uncovered when wells are abandoned, and during routine operations during the phase out period. Any grading occurring while wells are still operational is expected to remain the same as existing baseline conditions. Any grading occurring during abandonment would be minor, such as to perform temporary rough grading and slight excavation work to locate subsurface oil wells, and would foreseeably 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 under State law, if human remains are uncovered during any 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. Given the Ordinance's prohibition on new drilling and deepening, it is not reasonably foreseeable that significant grading is to occur during the phase out period. 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 human remains. 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.

The Ordinance is not anticipated to result in any significant operational changes during the phase out period that would result in a potentially significant increase to energy usage. 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. Key among these is CARB's 2022 Scoping Plan, which identifies a technologically feasible path to achieve net neutral carbon emissions by 2045, including a target of 85 percent reduction in Greenhouse Gas emissions and a 94 percent reduction in petroleum demand. 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"/> |
| 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, | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

subsidence, liquefaction, or collapse?

- 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?
- 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?

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. While the Ordinance would enable certain health and safety-driven activity under limited exceptions, it is speculative at this time to identify potential work that could require ground disturbance. Nonetheless, any potential impacts associated with future potential ground disturbance would require case-by-case CEQA analysis (if necessary) and compliance

with existing regulations intended to avoid substantial adverse effects. Any abandonment activities that would occur indirectly as a result of the ordinance would be conducted in accordance with CalGEM and LAFD requirements 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. Routine operations during the phase out period would remain the same as existing baseline conditions. 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 shear 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.³⁵ 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 through a separate zoning review process. 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 foreseeably include the construction of any new structures that would have the potential to be located on expansive soil during the phase out period or cessation. Well abandonment activities associated with cessation would be required to comply with applicable CalGEM and LAFD requirements. As such, substantial direct or indirect risk to life or property would not 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.

It is not reasonably foreseeable that the Project would 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

³⁵ City of Long Beach General Plan Program, Public Safety Element, May 1975 (reprinted 2004)

to be located due to past disturbance. Additionally, any grading occurring while wells are still operational is expected to remain the same as existing baseline conditions. 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*, dated September 2022 and included as **Appendix A** to this Initial Study. **Appendix A** establishes the foundational assumptions and methodology for this analysis. The core assumptions and impact analyses for GHG remain valid because the foreseeable effects of the project – the elimination of continuous, fugitive emissions from fossil fuel production – are unchanged. While this Initial Study integrates updated information, these updates serve to validate and reinforce the initial conclusions of **Appendix A**. These updates include, but are not limited to, the project description, the most recent well inventory data from June 2025, and the use of new regional planning documents. The new regional planning documents include SCAG’s 2024–2050 RTP/SCS, the 2022 AQMP, and CARB’s 2022 Scoping Plan. As such, the initial conclusions of **Appendix A** remain valid and include, but not limited to, that the permanent decrease in potential operational emissions resulting from the Ordinance is considered to have a positive impact on the State’s ability to achieve its GHG reduction goals, including carbon neutrality. Additionally, as described in the checklist question below, the GHG analysis in **Appendix A**, established the framework that the Project’s short-term abandonment activities result in temporary, one-time GHG emissions and that the long-term effect is a significant net benefit, avoiding GHG emissions per year upon abandonment of all subject wells, primarily from eliminating fugitive emissions. This Initial Study incorporates updated information and context to confirm these conclusions. The overall long-term finding – that the Ordinance results in a reduction in GHG emissions and is consistent with state and local climate goals – remains valid. As such, 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 this Initial Study and **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. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

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

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) an evaluation if the project conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. GHG checklist questions are typically evaluated together as the City does not have a quantitative threshold for GHG emissions and determines if there is an impact based on whether the project is consistent with the 2022 Scoping Plan and the other plans, policies and regulations adopted for purposes of reducing GHG emissions as discussed below. 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?**

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

Less than Significant Impact.

During the phase out period, ongoing operational activities are expected to continue at the existing level, and as such, no new or increased environmental impacts while wells are still operational are anticipated.

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 10, 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 10
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.³⁶ Nevertheless, **Table 11, Avoided Oil & Gas GHG Emissions**, which relies on assumptions validated in **Appendix A** 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.³⁷ Due to the programmatic nature of this analysis

³⁶ CARB, 2022 Scoping Plan for Achieving Carbon Neutrality, November 2022

³⁷ Intergovernmental Panel on Climate Change, Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories, Fugitive Emissions From Oil and Natural Gas Activities.

and the many variables at each oil and gas well throughout the City, the quantified estimates in **Table 11** are included for illustrative purposes. Furthermore, while it is clear and affirmed by the reduced inventory of wells requiring future abandonment that 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 as the City does not have a quantitative threshold for GHG emissions, including from an Ordinance regulating oil wells. 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.

Table 11
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.

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.³⁸ 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 2022 Update to the Climate Change Scoping Plan was approved by CARB in November 2022 and built upon the previous Scoping Plans. The 2022 Scoping Plan outlines a technologically feasible, cost-effective, and equity-focused path

³⁸ See **Appendix A** to this Initial Study for further information related to calculations and assumptions utilized to prepare these estimates.

to achieve carbon neutrality by 2045 or earlier. The major element of this plan is the aggressive reduction of fossil fuels by 86 percent in 2045 relative to 2022.³⁹

The Ordinance would be consistent with the objectives of CARB's 2022 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 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.

³⁹ CARB, California's 2017 Climate Change Scoping Plan, November 2017.

IX. HAZARDS AND HAZARDOUS MATERIALS

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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 carcinogenic. 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 wells 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.

Routine operations are anticipated to remain the same during the Ordinance’s phase out period. 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.⁴⁰

During the phase-out period, wells are required to abide by existing regulations to minimize the risk of methane release, including regular pressure testing, active monitoring, and routine inspections. Further, the termination of oil extraction activities would reduce the potential for upset and accident conditions associated with excessive methane from 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 abated due to a successful seal of the well. Some amount of residual methane is expected to seep out of

⁴⁰ 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 August 12, 2025.

the ground around the well after the well is successfully sealed. In keeping with current policy, the area would continue to be monitored by CARB and SCAQMD to ensure that methane levels remain below the 3 ppm threshold.⁴¹ 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.⁴²

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 accidental 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. While the Ordinance introduces a health and safety-driven exception to allow certain maintenance activities, it would not change baseline conditions as discussed above and also, it would be speculative at this time to predict whether any new equipment, activity, or operations may be proposed and authorized through this process. Therefore, any reasonably foreseeable impacts to releasing hazardous materials into the environment would be less than significant, no mitigation is required.

⁴¹ 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://conservation.ca.gov/calgem/Documents/Aliso/Process-to-Confirm-Aliso-Leak-Seal.pdf>, accessed June 2, 2025.

⁴² Air Quality Management District Community Emissions Reduction Plan for Wilmington, Carson, West Long Beach, September 2019, website: <https://www.aqmd.gov/nav/about/initiatives/environmental-justice/ab617-134/WCWLB/ceqp>, accessed June 2, 2025.

- 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 phase-out 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. While the Ordinance would enable certain health and safety-driven activity under limited exceptions for certain maintenance activities, it would not change baseline conditions as discussed above and also it is speculative at this time to precisely identify potential work that could emit hazardous materials, substances, or waste. Nonetheless, any potential impacts associated with future potential ground disturbance would require case-by-case CEQA analysis (if necessary) and compliance with existing regulations intended to avoid substantial adverse effects. The Ordinance's health and safety exception is also intended to provide regulatory oversight over certain oil drilling activities that have the potential to adversely affect public health, safety, and/or the environment. Work that may be approved through the Ordinance's limited health and safety exceptions would be for the purpose of sustaining the environment at conditions not harmful to public health and safety.

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 from the Ordinance 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 (including in any Industrial Use District of Chapter 1A of the LAMC). 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.

Routine operations are anticipated during the Ordinance’s phase-out period, and it is not reasonably foreseeable that activity will occur that will exacerbate hazardous conditions. 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) is required 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 those located on Cortese List, those actions would undergo additional environmental review in accordance with CEQA. With implementation of MM HAZ-1, impacts are considered less than significant.

Mitigation Measure

MM HAZ-1 For well sites in which the abandonment process requires any Los Angeles Department of Building and Safety (LADBS) permit 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/>);

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, the LAFD Hazard Mitigation Program, or the Department of City Planning. 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, they are Los Angeles International (LAX), Van Nuys, and Whiteman Airport, respectively. There are three inactive plugged wells located within one mile of LAX. However, it is not reasonably foreseeable that the project would 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. There are no active wells located within two miles of a public airport or public use airport; as such, it is not reasonably foreseeable that any wells would require abandonment in close proximity to an airport. Therefore, impacts would be less than significant and no mitigation measure is required.

- 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. During the phase out period, it is not anticipated that there will be activity that would impede emergency access that is not already regulated. 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 41 active wells, 125 idle wells, 223 plugged wells, and 3 canceled wells located in the City's designated Very High Fire Hazard Severity Zone, which would encompass those areas subject to wildland fires. It is not reasonably foreseeable that the Ordinance would 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 operation during the phase-out period, termination, and future abandonment would not impact state responsibility areas or lands classified as very high fire hazard severity zones. The LAFD Oil Wells Unit will issue permits for any well abandonment activities. The LAFD Oil Wells Unit will also conduct inspections, witness parts of the abandonment, and ensure that the operator follows all Fire Code requirements related to the abandonment activity. Therefore, 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
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"/>
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?

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

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. During the phase-out period, the Ordinance primarily prohibits expansion, intensification, or modification of the oil well sites. While the Ordinance prohibits new activities such as maintenance, re-drilling, or deepening, it includes limited exceptions for activity required to prevent or address a health and safety risk. Any activity, including routine maintenance and any action taken under the Health and Safety Exception, that involves potential contact with water or groundwater is subject to regulatory oversight and control. Specifically, any work order, modification, or potential discharge is subject to the permitting requirements of CalGEM and the Regional Water Quality Control Board. This regulatory framework ensures that no activity, whether routine or due to a Health and Safety Exception, would result in a change to existing water quality standards, waste discharge requirements, or otherwise impact surface or groundwater quality. Furthermore, future well abandonment that subsequently may occur would not involve demolition of existing structures, which may instead take place as part of any remediation (an activity outside the scope of this analysis). Internal roads, access ways and storm water retention, and other drainage features and facilities shall remain in place and under existing maintenance protocols. Because any activity that could affect water quality is subject to pre-existing, State and Regional permitting and oversight, implementation of the Ordinance would not result in any adverse 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.

Routine operations are anticipated during the Ordinance's phase out period, and it is not reasonably foreseeable that activity will occur that will differ greatly from existing baseline conditions and substantially decrease groundwater supplies or interfere substantially with groundwater recharge. 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. For instance, a recent comparable well abandonment required the use of approximately 95 barrels of water to complete the plugging process. The water to be used during the well abandonment process, is a temporary use rather than a continuous, consumptive use like production or irrigation. Even when considering all wells in the City that will eventually be abandoned, the individual and intermittent use of water for plugging is not expected to substantially 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.

During the phase out period, it is not reasonably foreseeable that there will be a change to existing drainage patterns from existing conditions. 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.

At this time, it is speculative to identify whether any limited health and safety-related activity authorized by the Ordinance during the phase-out period would necessitate changes to, or demolition of, existing drainage infrastructure. 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 flood hazard, tsunami, or seiche zones, activities related to abandonment would not increase the risk of release of pollutants involving flooding or inundation for because: 1) all wells would be required to be properly abandoned in accordance with CalGEM requirements, and 2) the materials used to plug the wells, such as cement are made up of naturally occurring minerals and when mixed with water result in a stable, solid, and non-toxic matrix. 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) the Ordinance is not anticipated to result in changes to existing baseline conditions during the phase out period. 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 non-hazardous materials necessary to plug and seal a well. Well plugging under the supervision of CalGEM is designed to protect aquifer zones from cross-contamination. These procedures utilize materials that are non-toxic and non-hazardous, including cement, mud, and fresh or brine water. Operators could use brine water or freshwater and cement mixture earlier in the abandonment process to prepare the wellbore. While the exact volume varies by well, records show that a single well abandonment may use approximately 95 barrels of water; this one-time, limited usage would not interfere with regional groundwater management. Furthermore, all physical work is restricted to previously developed areas, and neither new excavations nor the handling or release of hazardous materials (beyond residual, regulated substances) is involved. 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

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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. It is not reasonably foreseeable that any 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.

A conflict between a project and an applicable plan is not necessarily a significant environmental impact under CEQA unless the inconsistency would result in an adverse physical change to the environment (per CEQA Guidelines Section 15382). An excerpt from the legal practice guide Continuing Education of the Bar (CEB), Practice under the California Environmental Quality Act, Section 12.34 illustrates this point:

...if a project affects a river corridor, one standard for determining whether the impact is *significant* might be whether the project violates plan policies protecting the corridor; the environmental *impact*, however, is the physical impact on the corridor.

Under State Planning and Zoning law (Government Code Section 65000, et seq.) strict conformity with all aspects of a plan is not required. Generally, plans reflect a range of competing interests and agencies are given great deference to determine consistency with their own plans. A proposed project should be considered consistent with a general plan or elements of a general plan if it furthers one or more policies and does not obstruct other policies (Governor's Office of Planning and Research 2017). Generally, given that land use plans reflect a range of competing

interests, a project should be compatible with a plan's overall goals and objectives, but need not be in perfect conformity with every plan policy.

To determine the Project's potential to conflict with adopted policies, the City considered all of the City's General Plan elements, including but not limited to the Safety, Housing, Land Use Element (34 Community Plans), Conservation, Energy, Air Quality, A Healthy Plan for Los Angeles, all specific plans and overlays, the City's zoning ordinances, and the SCAG RTP-SCS (Connect SoCal 2024), and LA's Green New Deal.

Table 4 in the Project Description provides the relevant policies identified in these plans, policies and regulations.

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 countywide (L.A. Green New Deal)
- Reduce oil production by 40% below 2013 levels (L.A. Green New Deal)
- 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 and limit the expansion and intensification of the nonconforming use during the 20-year phase out period. The only policies that may arguably not be implemented by the Ordinance would be the Objective and Policy 1 in the Conservation Element, which provides:

Objective: conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits located within the city's jurisdiction so as to protect the petroleum resources for the use of future generations and to reduce the city's dependency on imported petroleum and petroleum products.

Policy 1: continue to encourage energy conservation and petroleum product reuse.

Programs 1, 2, and 3 intended to implement this objective and policy are related to energy conservation incentives and education, petroleum product recycling, and encouraging the use of alternative fuels and energy. As such, the Ordinance is not in conflict with these policies and objectives. The Ordinance will stop the extraction of existing oil and gas reserves and will preserve the petroleum product in place. While it may not meet the stated intent to reduce dependence on fossil fuels outside of the State or country, the Ordinance will support the City and State's numerous policies for use of renewable energy over fossil fuels. Additionally, as the Ordinance has a 20-year phase-out schedule it allows continued extraction of oil and gas while technologies continue to develop to move transportation and other sectors off of fossil fuels. Moreover, the Ordinance is consistent with the policies' intent for being "environmentally sensitive" as it supports protecting sensitive uses from the harmful effects of future oil and gas well activities as discussed in other sections, including Air Quality. There is no objective or policy or program in the Conservation Element mandating or encouraging the protection of existing production activities. And nothing in the policies in the Conservation Element shows those policies were adopted by the City Council to protect the environment.

As such, while the 2001 Conversation Element provides a map of the various oil fields in the City and discusses petroleum as a resource, as discussed above, it encourages reducing dependence and use of petroleum. Moreover, other General Plan policies recognize the activities associated with its extraction to be detrimental to public health, safety, and the environment and call for policies like the Ordinance. This is reflected in recent City initiatives and ordinances such as the Green New Deal, LA 100, 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.

The Ordinance is consistent with the City's General Plan and other goals and policies, discussed above and in the Project Description, 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 ‘Plan for a Healthy Los Angeles’, 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.⁴³

Cessation of oil and gas extraction activities is consistent with the City’s General Plan, specific plans and overlays and zoning, as well as the City’s Green New Deal and SCAG’s Connect SoCal 2024, 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.

The General Plan encourages the conservation and orderly extraction of non-renewable resources, including petroleum, where appropriate. The oil and gas resources are conserved under the ordinance and only restricted from extraction (i.e., they remain physically in the ground and are not consumed or destroyed), therefore this impact is considered less than significant especially when balanced against other policies in the General Plan that are furthered and met by the Ordinance. The Ordinance is strongly aligned with numerous other General Plan elements, including the Plan for a Healthy Los Angeles and the Safety Element, which explicitly call for the reduction of hazards from noxious activities. Additionally, in light of the State’s goals, codified in numerous statutes, bills, and policies, including the 2022 Scoping Plan adopted to comply with SB32, which calls for net neutrality and reduction of carbon emissions by 85% by 2045, and bills such as SB 1137 to protect sensitive users near oil wells to protect human health, eliminating oil production in the City would not result in an adverse environmental impact even if it were in conflict with General Plan policies. Therefore, the Ordinance does not have the potential to result in any significant impacts due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant, and no mitigation is required.

⁴³ 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, accessed August 11, 2025.

XII. MINERAL RESOURCES

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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.

As an initial matter, fossil fuels are not a mineral resource in the City's Conservation Element. (See Section 18 and 19 of the Conservation Element). The Conservation Element, as discussed above, has separate sections with different objectives and policies for mineral resources and fossil fuels. Additionally, in most geological treatises, minerals are distinct from fossil fuels. The differences are generally, although no rule is without exceptions, that although both are non-renewable, minerals are inorganic and formed by geologic process and generally have a crystalline structure.⁴⁴ Fossil fuels (coal, gas, oil) are deeply buried, dead organic material formed through high temperatures and pressure over hundreds of millions of years.⁴⁵ Additionally, State law and the Surface Mining and Reclamation Act of 1975 expressly does not include petroleum and natural gas in the definition of a mineral. (Pub. Resources Code Sections 2005 and 3501.)

⁴⁴ Minerals 101, USGS, <https://www.usgs.gov/science/science-explorer/minerals/minerals-101>, accessed June 2, 2025.

⁴⁵ Introduction to Fossil Fuels, Stanford Energy, Stanford University, <https://understand-energy.stanford.edu/energy-resources/fossil-fuel-energy/introduction-fossil-fuels>, accessed June 2, 2025.

While lead agencies, including the City, have historically prepared CEQA documents interpreting Appendix G questions on mineral resources as including fossil fuels, there is no intent shown in the plain language of the CEQA statute or guidelines to demonstrate it was intended to include fossil fuels. Time has shown that interpretations of thresholds in CEQA need to change with advancing knowledge of environmental impacts. For example, Senate Bill 743 (2013) was adopted to move transportation impacts from the experience of drivers sitting in delayed traffic to vehicle miles travelled to reflect that the actual impacts to the environment were caused by the release of greenhouse gases and air quality impacts from excessive car trips rather than the quality of the driver's experience sitting in traffic.

As discussed above and elsewhere in this Initial Study, the City has numerous adopted policies to move away from the use of fossil fuels and to protect residents from fossil fuel production, including the following:

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.

In light of the City's policies and the numerous policies of the State to make a transformative shift from the use of fossil fuels and move to a sustainable energy future without the use of GHG producing fossil fuels, including CARB's 2022 Scoping Plan calling for a 94% reduction in petroleum use in the State by 2045 and the State becoming carbon neutral, the City finds as a policy matter and based on substantial evidence, the loss of petroleum products is not an environmental impact and for purposes of this initial study, loss of the production or preservation of oil and gas is not a threshold of significance under this impact topic.

With the above-said, to the extent a court would disagree with the City's interpretation of "minerals" in the definition of "environment" in Public Resources Code Section 21060.5, the City will analyze the impact to oil and gas under the Appendix G mineral resource questions for informational purposes. The following analysis demonstrates even if oil and gas are a "mineral resource" for purposes of the Appendix G thresholds of significance, the Ordinance would not cause a significant impact.

The policies for mineral resources in the Conservation Element are the following:

Objective: conserve sand and gravel resources and enable appropriate, environmentally sensitive extraction of sand and gravel deposits.

Policy 1: continue to implement the provisions of the California Surface Mining and Reclamation Act (Public Resources Code Section 2710 et seq.) so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites.

The Ordinance will not result in any development that could remove or obstruct access to any sand or gravel deposits in the City, there would be no impact to those mineral resources identified in the Conservation Element. Additionally, there are active and idle wells located near identified sand or gravel resources. However, the phase-out and abandonment activities will not interfere with existing accessibility or extraction of these specific mineral resources for reasons such as but not limited to 1) the physical work involved in well abandonment is limited to the previously disturbed area of the well pad, and does not involve new, wide-scale excavation or deepening of existing excavations that would affect nearby sand and gravel deposits, 2) the activity does not add any new permanent structures that could obstruct access to the mineral deposits for future extraction, and 3) the primary activity is the vertical plugging of the existing wellbore with cement, mud, and soil, which is a localized action entirely contained within the subsurface and existing infrastructure and occurring for a short period of time.

Policies of the Safety and Conservation Element include the following policy related to oil and gas:

- Policy 1: Continue to encourage energy conservation and petroleum product reuse

This Ordinance is consistent with Conservation Element, Section 19 policies 1 to "encourage conservation of petroleum," as stopping future extraction will preserve oil

and gas reserves in place. Additionally, the Ordinance will allow extraction until 2045 when the State is supposed to be carbon neutral and have a 94% reduction in petroleum use. This is consistent with State policy and with the City's policies, including in the Conservation Element to move the City to renewable resources. See the programs adopted to implement Policy 1:

Program 1: public information and energy conservation incentives programs.

Program 2: petroleum products recycling.

Program 3: alternative fuel and energy sources research and use.

As previously stated, the annual cumulative oil production in 2024 in the City was 1.4 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, cessation of oil and gas extraction would not represent the loss of a mineral resource in that the resources remain within underground reservoirs and geological formations. Importantly, while the value of the resource to the region and residents of the state continues to diminish over time in terms of overall production, the statewide priorities shift considerably away from the use of fossil fuels and towards renewable energy. 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, the Ordinance would not be expected to impact mineral resources, including sand and gravel extraction.

Additionally, as discussed above, petroleum is not a mineral resource. Even if petroleum was a mineral resource, it is not a locally-important resource. This 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.”⁴⁶ 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, fossil fuels are no longer considered locally important, therefore, impacts would be less than significant and no mitigation is required.

⁴⁶ 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.gov/odocument/2442d4df-34b3-4683-8eb9-b5ea1182782b/Plan_for_a_Healthy_Los_Angeles.pdf for_a_Healthy_Los_Angeles.pdf

XIII. NOISE

The following is based on the Project's *Noise and Vibration Technical Report*, dated September 2022 and included as **Appendix B** to this Initial Study. **Appendix B** establishes the foundational assumptions and methodology for this analysis. The core assumptions and impact analyses for Noise and Vibration remain valid in that the analysis is limited to the short-term noise/vibration from well abandonment and the long-term changes resulting from the cessation of production. The analysis concludes that each well abandonment activity is assumed to last approximately two weeks and the analysis conservatively assumes all required equipment operates concurrently on a peak day to represent the work-case unmitigated impact. In addition, the analysis provides insight on the on-site equipment used. While the Initial Study integrates updated information, these updates serve to validate and reinforce the conclusions in **Appendix B** that the permanent elimination of operational noise results in a long-term beneficial impact for nearby sensitive receptors. These updates include, but are not limited to, the project description, the most recent well inventory data from June 2025, and the reference to the latest regional planning documents. The latest regional planning documents include SCAG's 2024–2050 RTP/SCS, the 2022 AQMP, and CARB's 2022 Scoping Plan. The Noise and Vibration analysis in **Appendix B** established the framework that the Project's short-term abandonment activities result in temporary, intermittent, and short-term noise and vibration impacts. Noise levels are calculated using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM), vibration levels are estimated using guidance from the FTA's Transit Noise and Vibration Impact Assessment Manual, and noise impacts are compared against the LAMC's regulatory standard in Section 112.05. This Initial Study incorporates updated information and context to confirm these conclusions. As such, the responses to the checklist questions below summarize the Project's potential Noise impacts found therein. For additional details related to noise and vibration setting, regulatory framework, assumptions, methodology, and impact analyses, please refer to this Initial Study and **Appendix B** to this Initial Study.

<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.

During the Ordinance’s phase-out period, ongoing operational activities are expected to continue at the existing level, and as such, no substantially new or increased noise levels while wells are still operational are anticipated.

Short-Term and Temporary Noise

It should be noted that the following analysis was prepared before the City’s construction noise thresholds were adopted by the Planning Department in September 2024. However, the threshold adopted in 2024 is not mandatory and the City may rely on other thresholds that are supported with substantial evidence. The following analysis relies on a threshold of significance based on the noise standards in Chapter XI of the LAMC (Noise Regulations). The construction noise analysis compared Project emissions against the most stringent and conservative standard in the LAMC. This is the Construction Noise Limit standard pursuant to LAMC Section 112.05, which indicates that noise from construction equipment operating within 500 feet of a residential zone shall not exceed 75 dBA at a distance of 50 feet from a noise source.

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.⁴⁷ 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 12, Temporary Noise Levels During Well Abandonment - Unmitigated**. As shown in **Table 12**, 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. While the total number of sensitive receptors located near oil wells may have fluctuated since the original analysis was run, this change does not affect the foundational findings and/or conclusions of the technical study. This is because Appendix B was conducted conceptually on a per-well basis and based on the total distance from a sensitive receptor. Furthermore, the cumulative number of wells within 50 feet, 75 feet, and 100 feet from sensitive receptors is for illustrative purposes only. Noise levels would diminish notably with distance from the site at a rate of 6 dB(A)

⁴⁷ 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.

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 12
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 12**, 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 Measure

MM NOI-1: Where well abandonment activities occur within 50 feet of a sensitive receptor, flexible sound control curtains shall be erected between the noise-producing equipment and the sensitive receptor(s), blocking the line-of-sight between the sources and receptor(s). 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. Sensitive receptors for purposes of this mitigation measure are schools, day cares, elder care facilities, adult residential facilities, parks, hospitals, or residences.

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.⁴⁸ 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.”⁴⁹ 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 13, 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 13
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.

⁴⁸ FHWA Noise Barrier Design Handbook, Terminology, July 14, 2011.

⁴⁹ FHWA Noise Barrier Design Handbook, Table 4, July 14, 2011

Other noise best practices are likely to 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 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

foreseeably 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.

During the phase-out period, ongoing operational activities are expected to continue at the existing level, and as such, no substantially new or increased groundborne vibration or groundborne noise levels while wells are still operational are anticipated.

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*,⁵⁰ groundborne vibration levels associated with abandonment activities are presented in **Table 14, Temporary Vibration Levels During Well Abandonment**. As shown in **Table 14**, 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 14** 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 14
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.

50 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

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- 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 two 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

	<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:

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)?

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

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. It is not reasonably foreseeable that any 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:

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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.

While wells remain operational during the Ordinance's phase out period, it does not

change baseline conditions and is not reasonably foreseeable that there will be a significant increase in demand for public services. LAFD oversees some well maintenance and well abandonment activities, and as such, there will be a need for inspections at sites as wells may be maintained, under limited exceptions, and 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) phase-out 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

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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"/>
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 ongoing operations during the phase out period and the eventual 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 Land Use and Climate Innovation (LCI), previously named 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, but these activities already occur within the existing environmental setting and do not result from the Ordinance. 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 and during routine operations during the phase out period, it is not anticipated that such closures would result in substantial delays to service providers. Any closures while wells are still operational are expected to remain the same as existing baseline conditions. 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:

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 and gas uses over a 20-year phase-out 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. Neither the implementation of the Ordinance nor the oil well abandonment and remediation process is anticipated to involve the excavation of soils or ground disturbance on undisturbed land. Furthermore, it is not reasonably foreseeable that any maintenance or other activities authorized under limited health and safety-related exceptions would require ground disturbance of undisturbed land, as these exceptions are designed to address immediate concerns on existing, disturbed sites. 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 May 29, 2025, notice of the Ordinance has been provided to tribes who have requested such notice in the City of Los Angeles. The opportunity to request consultation closed on June 30, 2025, and as of that date, no tribes have requested consultation.

XIX. UTILITIES AND SERVICE SYSTEMS

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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, as there would ultimately be a reduction in demand due to the cessation of oil and gas production uses. Nor would the Ordinance increase storm water runoff. The Ordinance does not affect natural gas managed by a public utility. As stated in **Land Use and Planning**, 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 and operation activities during phase out 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:

	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>
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 and during routine operations during the phase out period, it is not anticipated that such closures would result in substantial delays to service providers. Any closures while wells are still operational are expected to remain the same as existing baseline conditions. 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 26 active wells and 38 idle wells located in the City's designated Very High Fire Hazard Severity Zone. As described throughout this document, any well maintenance and other abandonment activities during phase out would occur in accordance with local and state regulations to ensure proper protocols are followed. With compliance with existing regulations governing well activities during phase out and 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. In addition, 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. Any exceptions for otherwise prohibited work during the phase out period would be to prevent risks to health, safety, and the environment and would not exacerbate fire risk. 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 routine operations during the phase out period and 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, in the event that the single well site within a SEA or any other area where ground disturbance is required, may have developed or contains riparian habitat or other sensitive natural community, a mitigation measure (MM BIO-1) has been adopted. The overall finding is that the impact is less than significant due to the disturbed nature of the sites and minimal work required. Potential impacts related to 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 routine operations during the phase out period and 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. Ultimately, the Ordinance will have beneficial impacts on human health by eliminating the risks created by fossil fuel production. For generations, residents in frontline communities have endured the hazards associated with living next to industrial oil and gas well sites. The Ordinance will ultimately minimize these adverse effects on frontline communities by removing the health hazards associated with these adjacent and incompatible land uses. Impacts would be less than significant and no further analysis is required.

5 CONCLUSION

Based upon the information set forth above, and the substantial evidence contained in the whole of the record of proceedings, the City finds that if the feasible mitigation measures set forth in this Initial Study are implemented, the adoption of this Ordinance will not have a significant effect on the environment, supporting the determination that a Mitigated Negative Declaration is appropriate for adoption.

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
Department of City Planning
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- 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.

2.1 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)
	24-Hour	50 µg/m ³	150 µg/m ³
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.

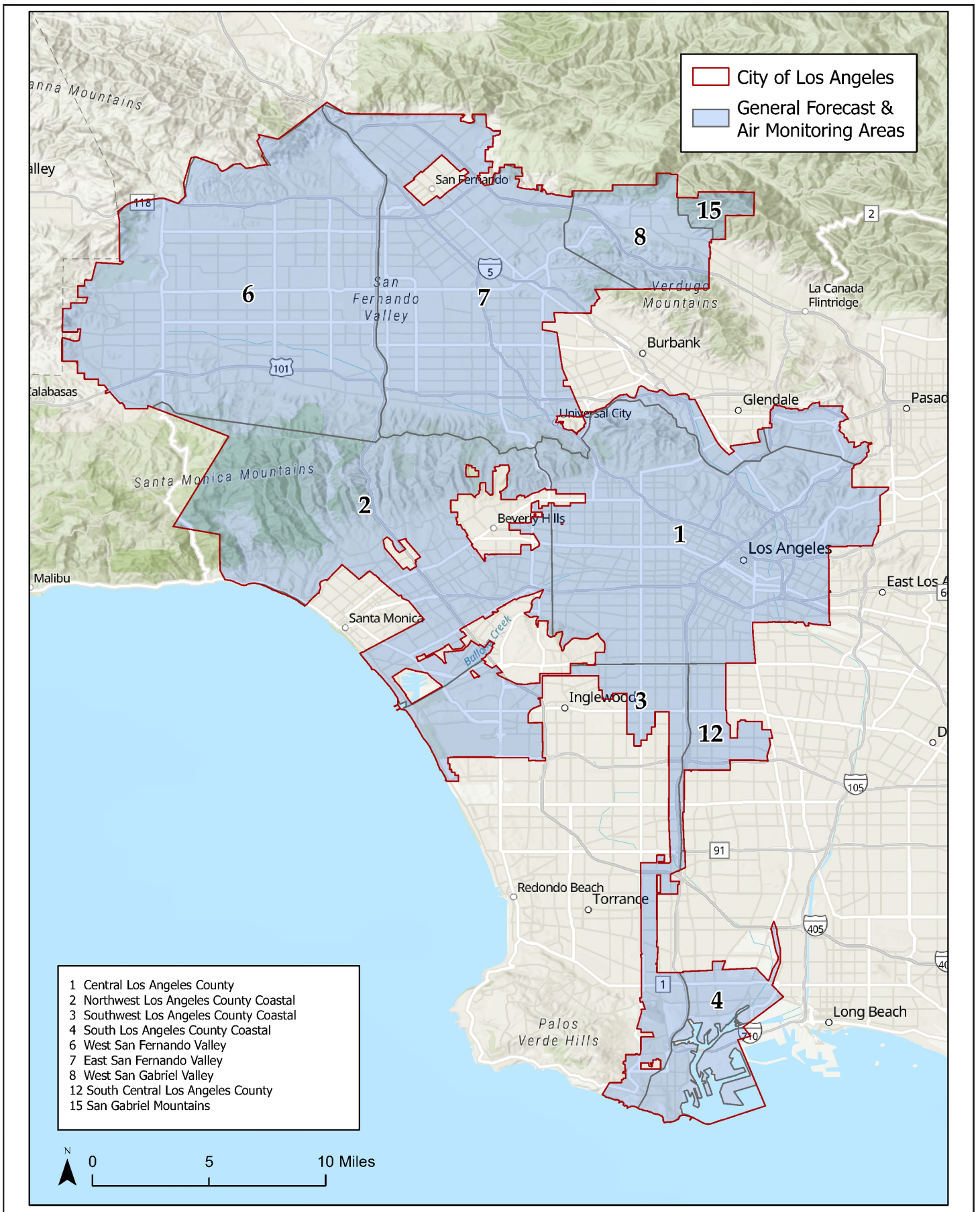
Local Air Quality

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, lightheadedness, 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 intention of protecting 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 ($\mu\text{g}/\text{m}^3$) 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 \geq 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas \geq 1 in 1 million) Chronic & Acute Hazard Index \geq 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		
NO₂ 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 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation) 1.0 $\mu\text{g}/\text{m}^3$	
PM2.5 24-hour average	10.4 $\mu\text{g}/\text{m}^3$ (construction) ^e & 2.5 $\mu\text{g}/\text{m}^3$ (operation)	
SO₂ 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 $\mu\text{g}/\text{m}^3$ (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 $\mu\text{g}/\text{m}^3$ (state) 0.15 $\mu\text{g}/\text{m}^3$ (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-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 NOx), PM10, and PM2.5. 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 ROGs (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 C_{ij}-Road Diesel-Fueled (C_{ij}-Road Regulation)*. Available online at: <https://ww3.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** (N₂O) is a colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N₂O 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 (SF₆) is an inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF₆ 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 CO₂, 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 CO₂. 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 (MMTCo_{2e}). 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 _{2e} 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=P100X14W.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 cf March 28, 2017: Promoting Energy Independence and Economic Growth*, Vol. 82, No. 61, March 21, 2017.

⁸³ Federal Register, *Executive Order 13990 cf 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 *NT*. 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 (MTCO_{2e}) to 545 million MTCO_{2e} (MMTCO_{2e}) (CARB 2011c). Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 MMTCO_{2e}, 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 MMTCO_{2e}.

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.

VMT 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 (MMTCO ₂ E)
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 MTCO_{2e} per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO_{2e} 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 MTCO_{2e} 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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IMPACT 
SCIENCES

APPENDIX A

Sensitive Receptors

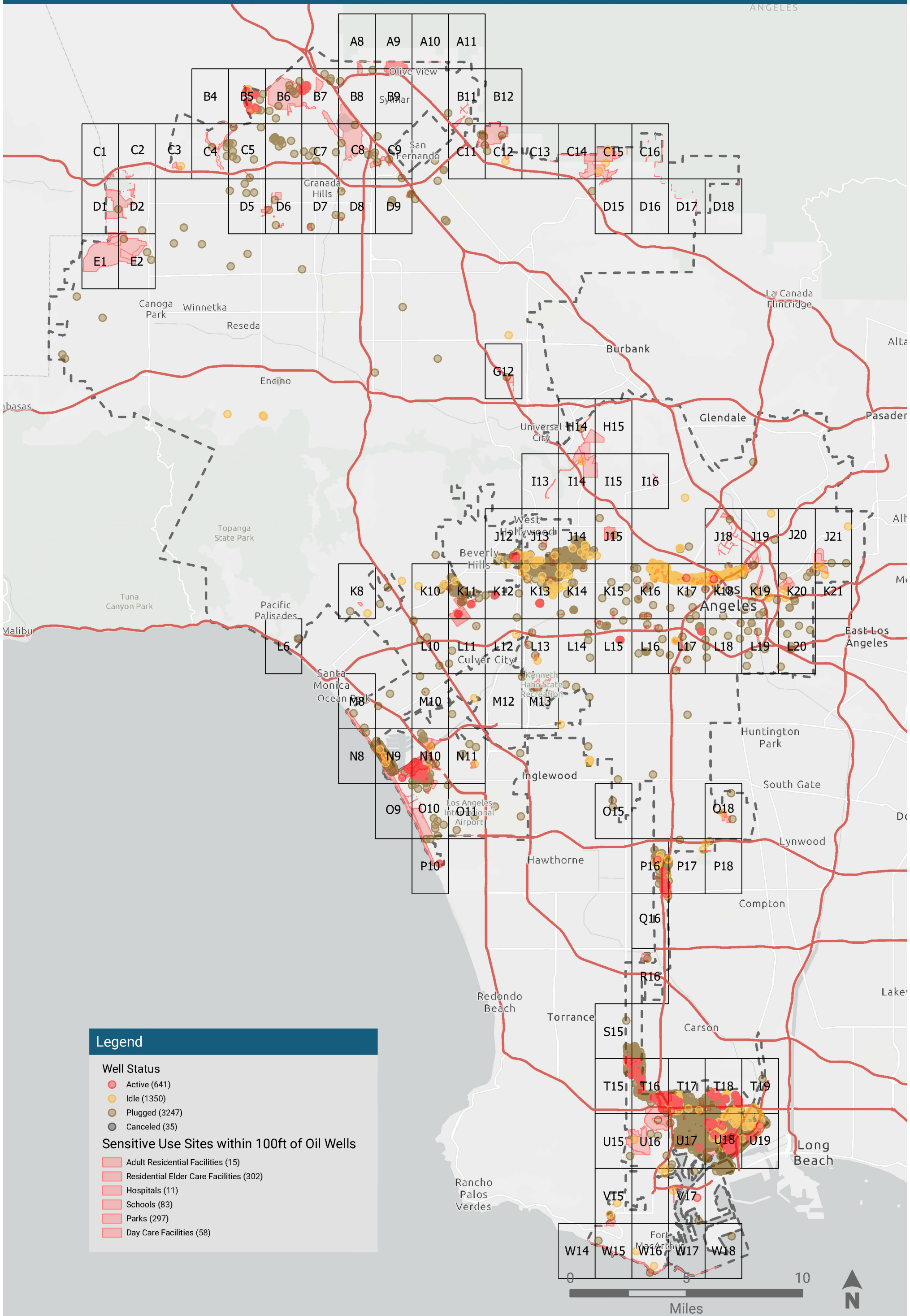
City of Los Angeles Oil Well Locations

Sensitive Use Sites Within 100 Feet of Oil Wells

DRAFT



ANGELES



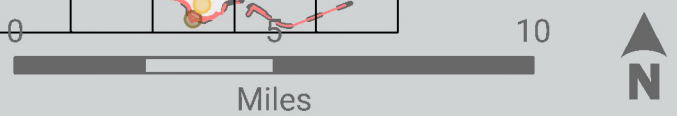
Legend

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

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5.13.1. Unmitigated

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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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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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

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5.10.1. Hearths

5.10.1.1. Unmitigated

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5.11. Operational Energy Consumption

5.11.1. Unmitigated

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5.12.1. Unmitigated

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5.13.1. Unmitigated

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5.15.1. Unmitigated

5.16. Stationary Sources

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5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

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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)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

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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

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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	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
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



Prepared for:

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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 ^a	65 VdB ^a	65 VdB ^a
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 Loading – 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

California Department of Transportation (Caltrans), *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, 2013 Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf>

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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

Los Angeles Municipal Code Chapter XI-Noise Regulation (Section 112.)

APPENDIX A

Sensitive Receptors

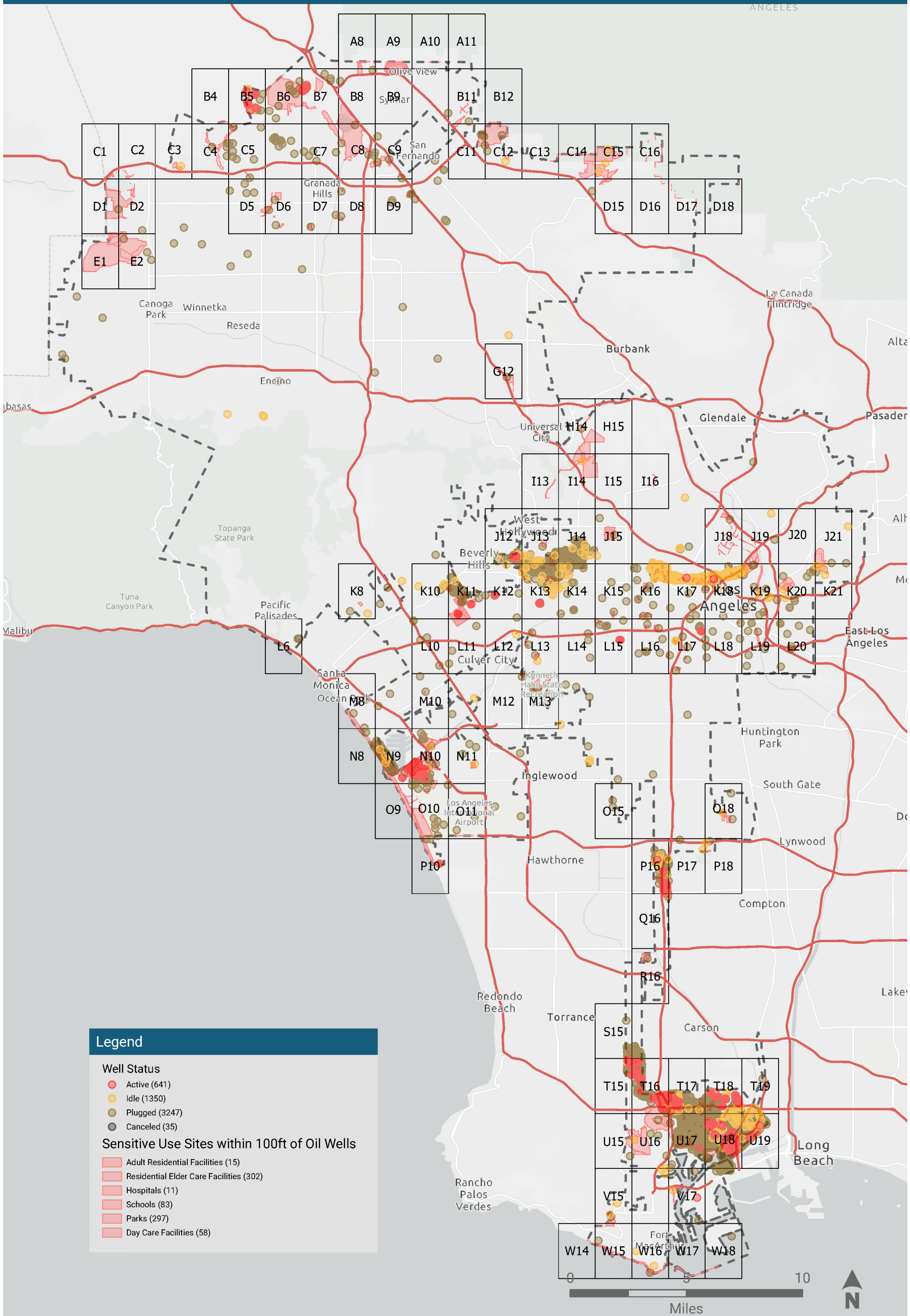
City of Los Angeles Oil Well Locations

Sensitive Use Sites Within 100 Feet of Oil Wells

DRAFT



ANGELES



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 Descriptor L.A. Oil & Gas Construction Noise

---- Receptor #2 ----

Description

Reference receptor at 75 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	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, 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 endure 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

Air Quality

Mitigation Measure

AQ-1 Emissions Standards for Off-Road Construction Equipment Greater than 50 Horsepower. All off-road diesel-powered equipment equal to or greater than 50 horsepower shall meet the U.S. Environmental Protection Agency's (USEPA) Tier 4 Final emission standards, or highest possible standards, during abandonment of wells. Operators shall maintain records of all offroad equipment to document that each piece of equipment used meets these emission standards.

Implementing Agency: DCP

Enforcement Agency: DCP and DBS

Monitoring Phase/Monitoring Actions: as oil wells are proposed for abandonment

Action Indicating Compliance: Equipment lists shall be provided as documentation of compliance.

Biological Resources

Mitigation Measure

MM BIO-1 Survey and Plan for Potential Habitats. Any well site located within a Potential Habitat Area, as identified on the City's Planning and Zoning Maps, such as areas mapped as "Protected Area for Wildlife (PAWs)", shall require a biological survey and report by a Qualified Biologist prior to any major decommissioning or abandonment activity that involves ground disturbance or vegetation removal outside of the immediate well pad area. If the survey identifies potential habitat for sensitive species, the operator shall prepare and implement a Biological Resources Management Plan, which shall include measures such as, but not limited to pre-construction surveys, worker environmental awareness training, and establishing avoidance buffer zones and seasonal restrictions where sensitive natural communities or riparian habitat are identified in compliance with all state and federal regulations (e.g., establishing bird nesting buffers as required by the MBTA), to ensure activities adhere to high standards of environmental protection.

Implementing Agency: DCP

Enforcement Agency: DCP and DBS

Monitoring Phase/Monitoring Actions: as oil wells are proposed for abandonment

Action Indicating Compliance: Preparation of a biological survey and report by a Qualified Biologist; preparation of a Biological Resources Management Plan as necessary.

Hazards and Hazardous Materials

Mitigation Measure

HAZ-1 For well sites in which the abandonment process requires any Los Angeles Department of Building and Safety (LADBS) permit 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://xapprod.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/>);

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, of 100 feet of an oil well site, 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, or a soil/groundwater contamination assessment shall also be prepared by a Qualified Environmental Professional. The Phase I and/or additional assessments 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. Any remediation plan recommended in 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: DCP and DBS

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, and that a No Further Action letter, or equivalent, from the regulatory agency overseeing remediation.

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: DCP and DBS

Monitoring Phase/Monitoring Actions: as oil wells are proposed for abandonment

Action Indicating Compliance: Equipment lists shall be provided as documentation of compliance.


INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

ENABLE BOOKMARKS ONLINE:

**If you are using Explorer, you will need to enable the Acrobat  toolbar to see the bookmarks on the left side of the screen.

If you are using Chrome, the bookmarks are on the upper right-side of the screen. If you do not want to use the bookmarks, simply scroll through the file.

If you have any questions, please contact the Commission Office at (213) 978-1300.

December 1, 2025

VIA EMAIL ONLY

cpc@lacity.org

Los Angeles City Planning Commission
c/o The Commission Executive Assistant
200 N. Spring Street, Room 763
Los Angeles, CA 90012

Re: *Council File No. 17-0447-S2; CPC-2025-2884-CA (December 11, 2025 CPC Meeting)
Warren's Initial Submission Opposing Proposed Oil and Gas Drilling Ordinance per AB
3233 and MND (ENV-2025-2885)*

Honorable Commissioners:

We represent Warren E&P, Inc.; Warren Resources of California, Inc.; and Warren Resources, Inc.; (collectively "Warren") and provide the following initial comments in advance of the City Planning Commission's ("CPC" or "Commission") December 11, 2025 meeting, in which Warren understands the CPC will consider the Proposed Oil and Gas Drilling Ordinance per AB 3233, as drafted September 2025 (herein, the "Oil Ordinance").¹

The Oil Ordinance proposes to amend Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter 1 of the Los Angeles Municipal Code (LAMC) and Sections 1.4.7, 5D.9.7, 8.2.4, 12.1.2, 12.5.4, 13B.2.2, and Division 14.3 of Chapter 1A of the LAMC to prohibit new oil and gas extraction, make existing extraction a nonconforming use in all zones, and prohibit expansion or intensification of oil well activities or new permanent or temporary site equipment beyond the limits of what was originally permitted. As explained on numerous prior occasions in connection with the previous (nearly identical) ordinance, and again detailed below, Warren opposes the adoption of the Oil Ordinance and the related Mitigated Negative Declaration ("MND"), which was just posted November 27, 2025 per the City's website (ENV-2025-2885).²

¹ Warren operates drilling and production sites within the City and would be detrimentally affected by the Project. It has a beneficial interest that would be adversely affected by the environmental impacts associated with the Project, and the Project will otherwise have a direct, substantial effect on Warren and its operations. Further, Warren makes these comments on behalf of the public interest, which interest would suffer if the City were not compelled to perform its duties under CEQA.

² Warren incorporates by reference all prior submissions in connection with the City's attempts to adopt Ordinance No. 187,709, including but not limited to the following: Warren's letter to the Planning

Warren urges the Commission to decline to adopt the Oil Ordinance because it is preempted by state and federal laws and is in direct contravention of the ruling, judgment, and writ of mandate (collectively referred to herein as the court’s “orders”) of the Los Angeles Superior Court in *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court Case No. 23STCP00060 and related cases (referred to herein as the “Warren related matters). While the MND contends that AB3233 is what now allows the City to adopt the same regulations on matters of statewide concern, AB3233 does not—and cannot—save the new Oil Ordinance. Simply put, the Legislature cannot allow a City to regulate a matter of statewide concern in this manner without first amending the Constitutional provisions that limit such regulation in Article XI Sections 5 and 7 of the California Constitution. The Legislature also cannot legislate around the California Supreme Court’s decision in *Chevron U.S.A. Inc. v. County of Monterey* (“*Monterey*”) (2023) 15 Cal.5th 135, holding that state law preempts local efforts to regulate oil and gas production methods and practices. The Oil Ordinance is thus unlawful and violates the prior orders.

Further, if adopted, the Oil Ordinance will effect an unconstitutional taking of Warren’s property and will deprive Warren and royalty owners of their vested rights. The Oil Ordinance also violates CEQA, is inconsistent with the City’s General Plan, and otherwise violates due process and equal protection rights under the constitution.

In addition to the below legal arguments, Warren objects to the extent the Commission intends to take any action whatsoever at its December 11 meeting because any action would be premature. Even though the CPC has scheduled its meeting for December 11, to date there has been no staff recommendation report made available to interested parties, nor has an agenda been posted. Most significantly, the City published the associated proposed MND on the Thanksgiving holiday, November 27, 2025, just four calendar days—and zero business days—before initial submissions (without any page limitations) on the Oil Ordinance were due. This timeline gives interested parties like Warren insufficient time to consider and comment on the Oil Ordinance and MND prior to the December 11 meeting and is thus a violation of due process. Further, the Commission is presumably considering making a recommendation to the City Council to approve the Oil Ordinance (and perhaps the MND) while the comment period on the MND is pending. The CPC may not recommend adoption of the Oil Ordinance (and MND) by the City Council until the CEQA review process is complete, certainly no sooner than the close of the public comment period on the MND of December 29, 2025.

For these reasons, Warren urges the Commission to defer taking action on the Oil Ordinance at its December 11 meeting so that it can fully consider the MND and all comments submitted in connection with both the Oil Ordinance and MND, and then Warren ultimately encourages the

Commission dated September 19, 2022; its letter dated October 5, 2022 to the Energy, Climate Change, Environmental Justice, and River Committee; its letter dated October 17, 2022 to the Department of City Planning as to the 2022 MND; its letters to City Council dated November 21 and December 1, 2022. Warren additionally incorporates by reference all submissions in opposition to the issuance of Zoning Administrator Interpretation ZA-2025-2976-ZAI (the “2025 ZAI”), and Zoning Administrator Interpretation ZA-2022-8997-ZAI (the “2023 ZAI”). Warren additionally incorporates by reference all arguments and evidence submitted by E&B Natural Resources Management Corporation and its related entities.

Commission to decline to adopt the Oil Ordinance and MND since they are in violation of state and federal law.

The Proposed Oil Ordinance is Preempted by State and Federal Law, Violates the Court's Orders and is Not Saved by AB 3233

The proposed Oil Ordinance is substantively identical to Ordinance No. 187,709 purporting to amend 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 and the accompanying prior 2023 ZAI. Despite Warren and others submitting collectively hundreds of pages of comment in opposition to Ordinance No. 187,709 and the related 2023 ZAI, the City plowed ahead, adopted the ordinance, and attempted to defend its actions in four related lawsuits in Los Angeles Superior Court. In September 2024, the Los Angeles Superior Court ultimately found that the ordinance and ZA documents attempted to regulate matters of statewide concern and were preempted by state law. *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court Case No. 23STCP00060 (Sept. 6, 2024) ("Sept. 6 Ruling," attached hereto as Exhibit A). The court thereafter entered judgment on the petitions and issued a writ commanding the City to refrain from enforcing the ordinance or ZA documents.

As the Los Angeles Superior Court stated in the orders, the City "here goes beyond the regulation of location and bars or regulates the oil production methods that may be used to extract oil from existing wells." (Ex. A [Sept. 6 Ruling] at p. 15.) The City is prohibited from regulating such methods and practices and the new Oil Ordinance is no different from the oil ordinance in this regard (and, in fact, it is substantially similar to the old ordinance). The new Oil Ordinance goes beyond location and still attempts to regulate the same matters of statewide concern. The City is bound by the court's prior orders on this point and cannot claim that it is no longer regulating a matter of statewide concern preempted by state law.

In ruling in Warren's favor on its preemption claim, the court stated that, "a writ of mandate shall issue, as the Ordinance and related guidance materials [the 2023 ZAI and ZA Memo 141] are preempted by state law and the 'home rule' doctrine does not save them from such preemption." (Ex. A [Sept. 6 Ruling].) To avoid continued litigation related to damages resulting from the City's violation of the law, the parties entered a stipulated judgment that included rescission of the ordinance, 2023 ZAI, and ZA Memo No. 141. (Exhibit B [judgment].) The final judgment of the court further provided that "the Court issues a judicial declaration that the Ordinance, ZA Memo 141 and ZAI are preempted by state law and additionally violate Article XI, Sections 5 and 7 of the California Constitution because [they] regulate a matter of statewide concern." [*Id.*]

The present, nearly-identical Oil Ordinance continues to be preempted and to unlawfully attempt to regulate matters of statewide concern for all the same reasons that the superior court found Ordinance No. 187,709 to be preempted and void. Citing to the California Supreme Court precedent set forth in *Monterey*, the court acknowledged that "CalGEM is 'tasked with overseeing the state's drilling, operation, maintenance, and plugging and abandonment of oil and gas wells.'" (Ex. A, Sept. 6 Ruling, citing *Monterey*, 15 Cal.5th at 140 (citing Pub. Res. Code §§ 3002, 3100, et seq., 3106(a)). Like in *Monterey*, the court found the ordinance to be preempted by section 3106 of the Public Resources

Code because “the Ordinance and related guidance contradict ‘section 3106’s mandate that the state ‘shall’ supervise oil operation in a way that permits well operators to ‘utilize all methods and practices’ the supervisor has approved.’” (Ex. A, Sept. 6 Ruling, quoting *Monterey*, 15 Cal.5th at 145.) The recently drafted Oil Ordinance is substantively identical to the preempted ordinance and thus is preempted for the same reasons.

Significantly, the court also found Ordinance 187,709 was not saved by the “home rule doctrine” applicable to charter cities because the ordinance attempts to regulate a matter of statewide concern—not a purely municipal affair. “[W]ith respect to oil and gas production, the Supervisor is charged with balancing those concerns for all Californians, along with meeting the energy needs of the state. The Court therefore finds that Division 3 of the Public Resources Code, including section 3106, addresses a matter of statewide concern.” Sept. 6 Ruling at 14. In other words, section 3106 directs the State Oil and Gas Supervisor to oversee oil and gas operations and to regulate them in a way that serves the dual purpose of ensuring the state has adequate oil and gas resources, while also protecting the environment. That dual purpose is a matter of statewide concern, and because section 3106 is reasonably related to that statewide concern, the home rule doctrine cannot save a conflicting city measure. The same is true here.

Presumably, the City relies on Assembly Bill (AB) 3233 for its authority to enact this more recent Oil Ordinance. AB 3233 added section 3106.1 to the Public Resources Code, purporting to negate the preemption rulings of both *Monterey* and the *Warren* related matters. Specifically, section 3106.1 attempts to give local entities authority to regulate oil and gas operations, despite the Supreme Court’s clear holding that such regulations are preempted by state law. The preemption holding of the Supreme Court in *Monterey*, however, was based on the constitutional provisions that provide for preemption by state law over conflicting local ordinances. Because the California Supreme Court is the final arbiter of state constitutional issues, unless a constitutional amendment is adopted, the legislature cannot overrule the Supreme Court. Once the Court has spoken on a constitutional issue, only a constitutional amendment can trump its holding. Consequently, AB 3233 is itself unlawful and cannot be relied upon to negate *Monterey*’s ruling, nor can it otherwise grant conflicting authority to local governments.

Nor can the legislature delegate to local governments regulation of a matter determined to be a statewide concern. Pursuant to Article XI, sections 5 and 7 of the California Constitution, local governments may regulate matters of municipal affairs. Nothing in the Constitution gives cities and counties, whether charter or not, authority to regulate matters of statewide concern, nor can the legislature delegate authority to cities and counties in a way that contravenes the Constitution. AB 3233 does exactly that by attempting to give cities and counties the right to pass ordinances to regulate a matter of statewide concern. For this distinct reason, AB 3233 is itself unlawful and void, and cannot save the Oil Ordinance from the court’s preemption ruling.

Finally, the Oil Ordinance is also preempted by federal law, and specifically the Federal Safe Water Drinking Act, as it conflicts with the federal government’s delegation of authority to CalGEM to regulate UIC wells. “Congress intended that states retain authority respecting underground injection so long as it does not impinge on the UIC program administered by the EPA.” (*Bath Petroleum Storage, Inc. v. Savas* (N.D.N.Y. 2004) 309 F.Supp.2d 357, 367-368.) Since the Oil Ordinance regulates injection wells, it is preempted by federal law. Further, to the extent AB 3233 attempts to permit cities and counties to regulate injection wells, the state exceeds the authority delegated to it by the federal government.

The Proposed Oil Ordinance Effects and Unconstitutional Taking and Deprivation of Vested Rights.

The Oil Ordinance, if adopted in its current form, will deprive Warren—and the royalty owners that it serves—of their real property rights. The U.S. and California Constitutions require the City to compensate Warren and its mineral owners for these losses. The Oil Ordinance, however, unlawfully makes no provision for such compensation.

The Oil Ordinance prohibits Warren from engaging in the customary operations necessary to maintain production from its existing wells. Warren’s only operations are located within the City of Los Angeles and new wells are prohibited by the Oil Ordinance. As a result, the Oil Ordinance would unquestionably result in taking of Warren’s vested rights, putting Warren out of business and leaving its employees jobless, their families without necessary financial support and its royalty owners without income that they have relied on for decades.

To date, Warren has invested over \$400MM to develop its mineral estate in the City of Los Angeles through three well cellars at a consolidated drilling facility (the “Site”). The current LAMC allows for these operations as a *permitted right*. Warren’s investment of over \$400MM was incurred not merely for its existing production at the Site but also for additional operations on existing wells within the three well cellars, so that production can be maintained over the projected life of the wells, and for the drilling of new wells in the same three cellars. The Oil Ordinance will affect a zoning change that deprives Warren of engaging in its business at the Site and its business as a whole, subjecting the City’s action to heightened scrutiny under the independent judgment standard. (*See e.g., Goat Hill Tavern v. City of Costa Mesa* (1992) 6 Cal.App.4th 1519, 1525.)

Warren and its royalty owners will be deprived of their reasonable investment-backed expectations and of the right to develop the remaining reserves. The Oil Ordinance thus will result in a taking of Warren’s and its royalty owner’s real property rights under the U.S. and California Constitutions, thereby subjecting the City to damages for this lost value—a significant liability for the taxpayers of the City of Los Angeles. (*See e.g., Penn Cent. Transp. Co. v New York City* (1978) 438 U.S. 104; *Hansen Brothers Enterprises v. Board of Supervisors* (1996) 12 Cal.4th 533, 553-554 (holding that “absolute prohibition [on mining] . . . practically amounts to a taking of the property”).)

Warren limited its operations to the Site and to the three well cellars at the City’s specific request. Also at the City’s specific request, Warren agreed to give up its right to redrill 560 wells located outside the Site and agreed to a phased process of plugging and abandoning wells in the nearby area in return for the City agreeing that Warren could drill 540 wells at the Site with up to 5 well cellars.³⁴ To date,

³ Zoning Case ZA 20725-0 (PA1) dated July 20, 2006 and Zoning Case ZA 20725-0 (PA2) dated October 2, 2008 (the “Approvals”).

⁴ Warren was not required under the LAMC relating to the Approvals to give up the redrill rights to 560 wells and conduct the plugging and abandonment of 56 wells in the residential areas outside the Site within a certain time period. Neither were these measures related to the mitigation of environmental impacts. Accordingly, there was no essential nexus and rough proportionality as would be required if the Approvals were interpreted solely as permits under *Nollan v. California Coastal Comm’n*, 483 U.S. 825 (1987) and *Dolan v. City of Tigard*, 512 U.S. 374 (1994). Accordingly, the Approvals constituted a contractual obligation and give rise to a vested property right for that and other reasons. (*See M. J. Brock & Sons, Inc. v. City of Davis*, 401 F.Supp. 354, 361 (1983); *Morrison*

Warren has plugged and abandoned 139 wells since 2006 and has plans to plug and abandon more wells as its business continues to operate in the City.

If the Oil Ordinance is adopted, Warren will not be allowed to complete its project under the terms agreed upon by the City since no new wells will be allowed (221 wells have been drilled to date) and existing production cannot be maintained. Warren, however, has a legally protected and vested property right to utilize the Site for these additional operations. (*See e.g., Avco Community Developers, Inc. v. South Coast Regional Com.* (1976) 17 Cal. 3d 785, 791.)

The *Avco* rule provides that when a property owner has performed substantial work and incurred substantial liabilities in good faith reliance upon an entitlement issued by an agency, the party acquires a vested right to complete the construction of the project. This is particularly true for Warren in that not only did Warren obtain all necessary approvals from the City, but it also gave up its rights to redrill 560 wells in the Wilmington neighborhood outside the Site. Accordingly, Warren must be allowed to complete its project.

Warren's situation is similar to that presented in the case *Goat Hill Tavern v. City of Costa Mesa* (1992) 6 Cal.App.4th 1519, 1530. In that case, as in Warren's, the owner had an underlying right to use the property as a tavern. The owner subsequently obtained a conditional use permit to expand the business. When that permit expired, the City argued that the owner's rights had expired. However, the *Goat Hill Tavern* court held that "once [an approval] has been properly issued the power of a municipality to revoke it is limited . . . Where [an approval] has been properly obtained and in reliance thereon the [grantee] has incurred material expense, he acquires a vested property right to the protection of which he is entitled." (*Goat Hill Tavern*, 6 Cal.App.4th at 1530.)

Similar to *Goat Hill Tavern*, where the tavern owner had an underlying nonconforming use right, Warren also has a right to use the Site as an oil and gas well drilling site by virtue of the City's February 25, 1972 approval of a drilling and production site within the Nonurbanized Oil Drilling District No. 5 in the R4 and M2-1-O zones and by virtue of the Approvals. The *Goat Hill Tavern* court cited to multiple cases in which an agency action would ultimately force the company out of business, which as discussed above is what will happen here with Warren. (*Id.* at 1528-1529.) The court also emphasized that "interference with the right to continue an established business is far more serious than when an agency denies a request for a permit in the first instance." (*Id.* at 1529.) Once a permittee has acquired such a vested right it may be revoked only if the permittee "fails to comply with *reasonable* terms or conditions *expressed* in the permit granted." (*Id.* at 1530 (emphasis added).) Here, the Oil Ordinance completely revokes Warren's vested rights despite its compliance with terms and conditions expressed in the 1972 approval of the "O" drilling district and in the Approvals, and thus Warren will be deprived of its vested real property rights.

Warren must either continuously drill and maintain its wells, or go out of business. The California Supreme Court recognized in *Hansen Brothers Enterprises v. Board of Supervisors* (1996) 12 Cal.4th 533 that unlike other uses that operate within an existing structure or boundary, the use of land for mining and, in this instance, oil and gas drilling, anticipates the need to continuously expand the reach

Homes Corp. v. City of Pleasanton. 58 Cal.App.3d 724 (1976).) The Oil Ordinance thus would improperly deny Warren a vested property right in violation of due process of law.

of the extraction activity. Warren must drill new wells and redrill and maintain old wells on the Site to maintain its current business. As stated by the California Supreme Court in *Hansen Brothers*, “this is not the usual case of a business conducted within buildings, nor is the land held merely as a site or location whereon the enterprise can be conducted indefinitely with existing facilities. . . the land itself is a material resource. It constitutes a diminishing asset.” *Id.* at 553-554. Accordingly, “the ordinary concept of use must yield to the realities of the business in question and nature of its operations.” *Id.* Given Warren’s substantial economic investment, Warren’s drilling rights are a vested property right and if the City chooses to terminate these rights, Warren would be entitled to compensation under the California and United States Constitutions.

It is Premature for the Commission to Consider the Oil Ordinance and MND and the MND Violates CEQA; A Complete EIR is Required

The California Supreme Court has explicitly rejected the ability of a reviewing body to take action on a proposed project prior to the completion of the CEQA review process, including the public comment period. Accordingly, if the Commission takes action on the proposed Oil Ordinance and/or the MND at its December 11 meeting, it would be doing so in violation of CEQA since the comment period on the MND does not expire until December 29, 2025.

In particular, in *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 388, 394 the Supreme Court stated that:

A fundamental purpose of [a CEQA document] is to provide decision makers with information they can use in deciding whether to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved. If post approval environmental review were allowed, [CEQA documents] would likely become nothing more than post hoc rationalizations to support action already taken. We have expressly condemned this.

Accordingly, under not only its own requirements, but also under basic CEQA law, the Commission cannot make a recommendation at its December 11 meeting without completion of the CEQA process. Doing so would deprive the public of the right to participate in the process and prevent the Commission from engaging in informed decision making.

Further, a brief review of the MND⁵ indicates that the Planning Department has understated the impacts that will result from this proposed project. It is clear that, ultimately, the City will be required to prepare an EIR, just as the County of Los Angeles is doing for its similar ordinance regulating oil operations.

By way of example, the MND’s conclusion that impacts to mineral resources are insignificant is based on a flawed view of what is a mineral resource—a view that contradicts the City’s own prior interpretation of that term—and directly contradicts the County of Los Angeles’s conclusion that its similar ordinance would result in a potentially significant environmental effect on mineral resources, requiring the preparation of an EIR. To be clear, the Planning Department’s conclusion on this point directly contradicts that of the County where the City is seated. (See Exhibit C for the County of Los Angeles Department of Regional Planning Initial Study in connection with the County’s Revised Oil

⁵ Warren will be submitting more fulsome comments to the MND prior to the December 29, 2025 deadline.

Well Ordinance which is designed to phase out oil production activities in the County.) The County concludes that preparation of an EIR is required in connection with the adoption of the County's Revised Oil Well Ordinance due to the potentially significant impacts to mineral resources. Since the Oil Ordinance bans new wells and maintenance activities on existing wells in support of the City's goal of eliminating production of petroleum resources, an EIR under CEQA is similarly necessary in the City just as it is with the County's ordinance. The City's Oil Ordinance will undoubtedly have an impact on availability of mineral resources, among other potential environmental impacts that the City has failed to consider despite Warren and others urging such consideration.

The City's analysis as to impacts to the "loss of availability" of mineral resources ignores the explicit standard in both the CEQA Guidelines and in the City's own CEQA thresholds of significance, and instead focuses on things like policies to reduce oil production, and the current production occurring in the City. The California Energy Commission, however, has published a report in response to Governor Newsom's request for recommendations for state policy changes to help "ensure that Californians have access to safe, affordable, and reliable transportation fuels and that petroleum refiners continue to see value in serving the California market . . ." (CEC Report, June 27, 2025, attached hereto as Exhibit D.) The State thus is concerned with the loss of availability of petroleum resources within the State and the CEQA guidelines require an analysis of the loss to the State, not just the City. The MND improperly ignores the expert CEC report.

Also, the CEQA Guidelines require an analysis not of the loss of production, but of the loss of availability, of the known mineral resource. The City's own Oil and Gas Health Report dated July 25, 2019, which is incorporated herein by reference, confirms that *1.6 billion barrels* of recoverable oil and gas reserves remain beneath the City:

Even after more than century of prolific production, the US Geological Survey estimates 1.6 billion barrels of recoverable oil remain in place beneath the City, *rivaling the reserves in the Middle Eastern countries, like Saudi Arabia, Iraq, and Kuwait 14,000 miles away.*⁶

Similarly, a report by the US Geological Service dated February 2013 describes the Los Angeles Basin, which is partly encompassed by the City, as containing "one of the highest concentrations of crude oil in the world. Sixty-eight oil fields have been named . . . including 10 accumulations that each contain more than 1 billion barrels of oil. One of these, the Wilmington-Belmont, is the fourth largest oil field in the United States." USGS Fact Sheet 2012-3120, which is incorporated herein by reference.⁷ Accordingly, based on this expert evidence alone it is undeniable that the Oil Ordinance will have a significant impact on the availability of mineral resources and an EIR is thus required.

The MND also severely underestimates the potential air quality and health risk impacts from the condensed schedule to plug and abandon wells and uses incorrect assumptions in calculating those

⁶ https://clkrep.lacity.org/online/docs/2017/17-0447_rpt_BPW_07-29-2019.pdf at page 19. Warren also incorporates by this reference the entire Administrative Record in the Warren related matters, which includes this document.

⁷ <https://pubs.usgs.gov/fs/2012/3120/fs2012-3120.pdf>. Warren also incorporates by reference this document from the Administrative Record in the Warren related matters.

impacts. Warren incorporates by reference its expert submissions on the prior oil ordinance from Yorke Engineering, Inc. (“Yorke”) on these issues. Yorke’s submissions reflect that the Oil Ordinance will result in a significant impact to air quality.

CEQA requires that where there is substantial evidence supporting a fair argument that the project could have a significant non-mitigable effect the City must prepare an EIR. (CEQA Guidelines Section 15064(f)(1).) Even where there is “disagreement among expert opinion supported by the facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.” (CEQA Guidelines Section 15064(g).) The Yorke expert analyses and the County’s conclusions both demonstrate a disagreement among experts such that an EIR should be prepared.

The MND’s analysis of greenhouse gas emissions (“GHGs”) is also deficient because it only analyzes the direct impacts related to curtailing oil and gas production in the City. It does not analyze any indirect impacts related to the termination of oil and gas production and reclamation of the sites to new uses, which it is required to do under CEQA. (CEQA Guidelines Section 15064(d).)

There is No Evidence to Support that Warren’s Operations Result in Negative Health Effects

Warren not only complies with California’s stringent environmental regulations, but it also agreed with the City to use electric sources for its operations except for two combustion sources which produce minimal emissions and are not a significant impact for the City.

In 2019, the City of Los Angeles Office of Petroleum and Natural Gas Administration and Safety conducted an exhaustive review of government reports and studies and concluded that:

There is a lack of empirical evidence correlating oil and gas operations within the City of Los Angeles to widespread negative health impacts. The lack of evidence of public health impacts from oil and natural gas operations has been demonstrated locally in multiple studies by the Los Angeles County Department of Public Health, the Los Angeles County Oil & Gas Strike Team, the South Coast Air Quality Management District and the comprehensive Kern County Environmental Impact Report and Health Risk Assessment.⁸

The City’s position now is contrary to that prior report and not supported by the evidence. Warren’s equipment and operations do not emit significant quantities of air pollutants and do not pose a significant health risk to the community residents or the public. Warren participates in annual emissions reporting to the SCAQMD, which includes mandatory reporting of air pollutants regulated by the Clean Air Act. Warren facility’s actual emissions are low and based on these reported emissions the facility has never been required to obtain a federal operating air permit as it remains below major source thresholds for all pollutants. Further, low emissions of regulated pollutants are evidenced by the fact that Warren does not participate in the SCAQMD’s RECLAIM program for large sources of oxides of nitrogen (NOx) and sulfur (SOx). Lastly, as a minor stationary source located in a heavily industrialized area of Wilmington, Warren has not permitted or installed new equipment or modified existing equipment in over 6 years.

⁸ https://clkrep.lacity.org/online/docs/2017/17-0447_rpt_BPW_07-29-2019.pdf at page 145. Warren incorporates by reference this document from the Administrative Record in the Warren related matters.

In addition to regulated pollutants, Warren has consistently reported low emissions of air contaminants. The facility routinely reports emissions to the SCAQMD yet has never been required by the SCAQMD to prepare a Health Risk Assessment (HRA) because of low emissions. For example, as determined by Yorke, Warren's reported emission of air pollutants and associated health risk impacts are on par with that of a supermarket with a fast-food restaurant or of a fast-food restaurant with a drive through.

Warren has obtained the appropriate air quality permits for all operating equipment. Restricting maintenance, testing, and repair of the existing equipment would not represent an emission reduction or result in any improved air quality for the area or the region.

Furthermore, and in violation of the Equal Protection Clause as applied through the Fourteenth Amendment to the U.S. Constitution, the City is unlawfully discriminating against one industry by prohibiting its operations within the City without taking similar actions against other industries or uses that provide similar or even more emissions than the oil and gas industry.

For all these reasons and those contained in the prior submissions to the City by Warren and other industry participants, Warren urges the Commission to not take action on the Oil Ordinance and MND at this time and ultimately to deny approval of the Oil Ordinance.

Sincerely,

DAY CARTER & MURPHY LLP



Tracy K. Hunckler

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Attachments