



# Los Angeles County Department of Regional Planning

*Planning for the Challenges Ahead*



**Amy J. Bodek, AICP**  
Director of Regional Planning

**Dennis Slavin**  
Chief Deputy Director,  
Regional Planning

April 14, 2020

TO: Pat Modugno, Chair  
Laura Shell, Vice Chair  
David W. Louie, Commissioner  
Elvin W. Moon, Commissioner  
Doug Smith, Commissioner

FROM: Adrienne Ng  
Regional Planner, Ordinance Studies Section

**SUBJECT: SUPPLEMENTAL MATERIALS  
PROJECT NO. 2020-00246-(1-5)  
RPPL2020000624  
April 15, 2020 - Agenda Item: 9**

Staff has received four letters regarding this item. The letters are attached to this document.

In response to the evolving coronavirus emergency, Los Angeles County facilities are closed to the public at this time. For the most current information about available services, public meeting schedules, and planning projects, please visit [planning.lacounty.gov](http://planning.lacounty.gov).

Should you have any questions, please contact Adrienne Ng via email at [ang@planning.lacounty.gov](mailto:ang@planning.lacounty.gov).

BS:BD:AN

Attachments:

A letter dated April 8, 2020 from Nielsen Merksamer Parrinello Gross & Leoni LLP

A letter dated April 8, 2020 from STAND-LA Coalition, Natural Resources Defense Council, Sierra Club, Redeemer Community Partnership, SCOPE, Esperanza Community Housing, Center for Biological Diversity, and Liberty Hill

A letter dated April 9, 2020 from Los Angeles/Orange Counties Building and Construction Trades Council

A letter dated April 14, 2020 from Los Angeles County Business Federation



April 8, 2020

**VIA PDF E-MAIL & 1ST CLASS MAIL**

[ang@planning.lacounty.gov](mailto:ang@planning.lacounty.gov)

County of Los Angeles Department of Regional Planning  
Attention: Adrienne Ng, Ordinance Studies Section  
320 West Temple Street, 13th Floor  
Los Angeles, CA 90012

Re: **Oil Well Ordinance Discussion Draft**

Dear Ms. Ng:

We write on behalf of our client, Californians for Energy Independence ("CEI"), to express serious concerns regarding a discussion draft of an amended Oil Well Ordinance presented by staff to members of the oil and gas industry dated March 5, 2020. On behalf of the County's oil and natural gas producers and thousands of oil and gas workers, we have serious concerns about the proposed discussion draft and we urge the County Department of Regional Planning ("Department") to postpone any plans to move forward with that draft in light of the public health and economic emergencies caused by the global spread of the coronavirus disease COVID-19. Nevertheless, because our client was asked by staff to provide comments on the discussion draft, we believe it is imperative to provide a timely response.

**The COVID-19 Pandemic Has Exposed the Need for California and Los Angeles County to Produce More Goods and Energy Locally, So We Are Better Prepared for Disasters and Supply Disruptions.**

Your Board and the County Department of Public Health have done admirable work in addressing the spread of COVID-19, enforcing social distancing through your Safer at Home Order while authorizing critical infrastructure businesses and workers to deliver essential energy, goods and services, and seeking to prevent overloading of hospitals. However, the COVID-19 pandemic has demonstrated that Los Angeles County and our State rely too heavily on foreign producers and manufacturers for vital prescription drugs, basic safety equipment like gloves and masks, medical supplies like plastic

ventilator tubing and test kits, and medical devices, as well as countless other manufactured goods.

Despite having enormous energy resources in the County and the State, the lack of local energy production is also acute, with California importing 60 percent of its crude oil consumption from foreign countries – a 500% increase since the 1980s. Last week alone, there were 12 supertankers stacked up offshore Southern California to unload over 13 million barrels of foreign crude oil in local ports – 8 percent of California’s total in-state production for an entire year. COVID-19 has exposed that the County urgently needs to become more self-sufficient in essential manufactured goods, raw materials, and energy. Angelenos should never again face shortages in basic necessities, like medicine, hospital and household supplies and energy, which put lives and our society at great risk. Pursuing an Oil Well Ordinance that would prohibit new oil and gas production in most unincorporated areas of the County and significantly restrict existing production in the remainder would increase our dependence on imported energy at exactly the wrong time.

At the outset, CEI strongly encourages the Department to postpone any plans to proceed with the discussion draft or any other measures that would impose additional costs on operators of oil wells and associated facilities (or businesses of any kind), diminish or eliminate the value of oil reserves and royalties, restrict or prohibit access to mineral rights, or create additional uncertainty for operators, rights-holders, and—most significantly—workers at a time of unprecedented stress for not only the energy production industry but for the County and the nation as a whole.

Oil and Gas Wells and Facilities in the County Are Critical Infrastructure and Petroleum Workers Are an Essential Workforce.

Governor Newsom’s COVID-19 Executive Order and Essential Critical Infrastructure List specifically identify oil and natural gas drilling, extraction, production, processing, storage, and transportation as critical infrastructure, as do the County’s Safer at Home Order and the U.S. Department of Homeland Security. These orders authorize the thousands of workers who safely operate and maintain wells, rigs and facilities every day to continue working as an essential workforce while practicing enhanced health measures such as physical distancing. As with many Americans, oil and gas operators, workers, rights-holders, and our partners in the construction, trucking, refining and utility industries are focused on making necessary adjustments to their

businesses and personal lives to protect the County's energy supply as COVID-19 spreads and continues to impact society. Moving forward with consideration of the discussion draft would require affected parties to divert resources that are being utilized to respond to the current market and public health emergencies.

As the County's Healthcare Measures Succeed in Mitigating the COVID-19 Virus, the Public and Private Sector Will Need to Prioritize Rapid Recovery of Employment and Our Economy.

Recovering rapidly from the COVID-19 crisis and its impacts on public health, employment, government resources and revenues, private investment and economic activity should be the shared primary mission of all levels of government and the private and non-profit sectors. With the effects of COVID-19 shutdowns decimating the County's economy, budget, tax base and unemployment, local operators and workers – just like thousands of other businesses and millions of other Angelenos – face unprecedented threats of dislocation and hardship. The proposals in the March 5, 2020 discussion draft of the Oil Well Ordinance would greatly exacerbate these strains.

CEI requests that the Department defer consideration of proposals, such as the Oil Well Ordinance, that would impose additional costs on operators of oil and gas wells and associated facilities, diminish or eliminate the value of oil reserves and royalties, restrict or prohibit access to mineral rights, restrict other construction by expanding setbacks around oil and gas wells and facilities, or create additional uncertainty for operators, rights-holders, and—most significantly—workers at this time of unprecedented stress. Both the County and the State have a critical role in permitting new construction, manufacturing and production so Angelenos who have lost jobs and businesses that have been closed can get back to work and greatly improve our resiliency for the next natural disaster. The draft Oil Well Ordinance would interfere with and detract from the economic rebound from COVID-19 that our society desperately needs. On August 13, 2019, the Board requested the Department of Public Works and the Chief Sustainability Officer to report on the resiliency of the County's energy supplies and infrastructure, and the Department should study that resiliency report and incorporate its findings into any drafting or consideration of an amended Oil Well Ordinance.

The Discussion Draft Would Significantly Impact Surface and Mineral Rights, Requiring Substantial Notice to Ensure Due Process for Affected

Property Owners and Workers and an Environmental Impact Report  
under CEQA.

The discussion draft is incomplete, vague, and full of placeholders that are material to the proposed regulatory scheme and its effects on operators, mineral rights-holders, other surface rights-owners, and workers. For instance, the discussion draft does not define key terms, describe what operators must include in applications, or set forth standards for the review, appeal, or revocation processes. The outline lacks details regarding numerous critical provisions (e.g., performance standards, fencing and containment, well maintenance, plugging and abandonment, restoration, and monitoring), many of which are already governed by comprehensive state and federal law, but that are, apparently, to be modified by the County in any number of potentially significant ways. Further, the few portions of the core elements of the draft that are provided are internally inconsistent. As just one example, the flow chart for new well applications on Page 1 of the draft lists various procedures and standards that are nowhere to be found in Section 8 (i.e., the actual, operative component) of the draft. Suffice to say, CEI is concerned with the lack of coherence, clarity, and administrability of the discussion draft and does not believe that it is ready for comments or meaningful public debate.

Moreover, we are very concerned with the lack of notice and outreach to those impacted by the draft ordinance. Even assuming the several issues noted above had been addressed, the County has, to our knowledge, also failed to provide operators, workers, mineral rights-holders, surface rights-holders, and the general public with substantial and meaningful notice of their right to express their views and protect their interests. Listening sessions held by the Department in 2018 did not support an immediate ban of future oil and gas drilling and production in much of the unincorporated area of the County as envisioned in the discussion draft, or significant restriction of oil and gas production in the remainder.

As currently drafted, and despite the lack of key details, it is clear the proposal would have unprecedented and far-reaching consequences for one of the County's largest industries. It would dramatically affect existing operators and the workers they employ and diminish or eliminate the value of oil reserves and even prohibit access to mineral properties in all residential, commercial and watershed zones throughout the unincorporated areas of the County, thus directly taking the property of mineral rights-holders and those entitled to royalties. Other property owners, including but not limited to the

owners of impacted surface property, also deserve adequate notice of the proposal so they can analyze and understand the several ways in which the draft ordinance will harm their property value (e.g., making future residential uses impossible within the expanded setback distance proposed in the discussion draft). Practically speaking, it is not clear how affected parties would be able to organize and effectively voice their concerns about the proposal given the imperative to practice social distancing and follow public health recommendations and mandates.

Given the complexity of the legal and technical issues and the magnitude of foreseeable injuries—including the real risk of substantial litigation that would adversely affect County taxpayers—the County should halt all work on the discussion draft until it develops a comprehensive plan to notify and meaningfully communicate with the various categories of individuals and businesses that would be affected by the draft.

The Department should also be mindful of the County’s obligations under the California Environmental Quality Act (“CEQA”) that would arise from moving forward with the discussion draft. As you are aware, a measure that would dramatically alter the rules governing current energy production facilities and have the effect of limiting future local energy production would qualify as a “project” under CEQA.<sup>1</sup> Further, environmental review would be necessary, because none of the statutory or categorical exemptions in Sections 21080 or 21084 of the Public Resources Code apply or, at the very least, because the measure would result in “unusual circumstances” that will likely adversely affect the environment.<sup>2</sup> Last, given the far-reaching impacts that the proposed discussion draft would have on widespread energy production facilities in the County and the overall mix of energy production and use in the County, the need for increased crude oil imports by supertanker to offset

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<sup>1</sup> See Pub. Res. Code § 21065 [project is an activity “which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment”]; *Save the Plastic Bag Coalition v. City and County of San Francisco* (2013) 222 Cal.App.4th 863 [not disputed that ordinance banning the sale of plastic bags was a “project” for purposes of CEQA]; *Magan v. County of Kings* (2002) 105 Cal.App.4th 468, 474-75 [ordinance phasing out and banning land application of sewage sludge was a “project” for purposes of CEQA].

<sup>2</sup> CEQA Guidelines, § 15300.2(c). Here, given the widespread nature of energy production in Los Angeles County and the unprecedented nature of a restrictive County-wide measure in a county with extensive production, it is straightforward that the “unusual circumstances” doctrine would apply. See generally *Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1207-08.

reduced local production, and even the use and development of surface property within an expanded setback distance around existing wells, the project would likely have a significant environmental impact, thus requiring an Environmental Impact Report (“EIR”).<sup>3</sup>

Beyond these procedural considerations, there are two primary legal issues that the Department should be mindful of if it nevertheless decides to proceed with the discussion draft. First, as currently proposed, the ordinance would almost certainly result in extremely substantial financial liabilities to the County under the “takings” clause of the Fifth Amendment to the United States Constitution and comparable provisions of the California Constitution. These measures require payment of just compensation when a government entity inversely condemns and therefore “takes” private property for a public use. The factors established in the seminal case of *Penn Central Transportation Company v. New York City* and elaborated in subsequent decisions would likely favor numerous categories of operators and rights-holders, in which case the County would be required to pay compensation in the hundreds of millions of dollars, or even more.

Although some cases could be litigated together, other challenges could be adjudicated and resolved on a case-by-case basis depending on the unique impacts of the measure on the operator and/or property owner. Thus, even if certain claims were unsuccessful, they would still result in substantial and sustained litigation costs for the County, potentially in the millions of dollars per year or more.<sup>4</sup>

Second, many of the proposals in the discussion draft would likely be invalidated by a court because they are preempted by state or federal law. It is undisputed that local governments have authority, within limits, to make land use decisions, including for conservation and environmental protection purposes.<sup>5</sup> However, this authority does not extend to the regulation of

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<sup>3</sup> See generally *Tomlinson v. County of Alameda* (2012) 54 Cal.4th 281, 286.

<sup>4</sup> See generally *Chevron U.S.A. Inc., et al. v. County of Monterey* (Sup. Ct. Monterey Co., Case No. 16CV003978 [Dec. 28, 2017]); Chelcey Adami, *Fracking ban case settled in Monterey County*, The Californian (May 15, 2018) [“The county’s \$36 million budget deficit next fiscal year contributed to the board of supervisor’s decision to settle. It allows the county to avoid potentially millions of dollars in attorney fees and costs, according to county officials.”].

<sup>5</sup> See 59 Ops.Cal.Atty.Gen. 461 (1976).

“subsurface activities,” where state law occupies the field.<sup>6</sup> The discussion draft clearly exceeds the delineated boundaries of local authority over oil drilling and production (e.g., it addresses methods of drilling, completion and maintenance of wells, oil and gas recovery methods, and plugging and abandonment).<sup>7</sup> The proposal is, at its core, an unprecedented attempt to establish a comprehensive regulatory scheme for the drilling, operation and maintenance of wells and associated production facilities at the county level. It is simply not plausible to construe the discussion draft as limited to surface land use regulations (e.g., hours of construction activity or truck access routes).

\* \* \* \* \*

For these reasons, we strongly encourage the Department to halt any and all consideration of the discussion draft and instead continue to work with industry, workers, and County property owners to develop targeted, administrable solutions to address any legitimate issues to ensure that the County maintains its production of vital local energy supplies.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sean P. Welch", with a long horizontal flourish extending to the right.

Sean P. Welch  
David J. Lazarus

SPW/pas

cc: Supervisor Kathryn Barger, Chair, Los Angeles County Board of Supervisors  
Supervisor Hilda Solis, Los Angeles County Board of Supervisors  
Supervisor Mark Ridley-Thomas, Los Angeles County Board of Supervisors  
Supervisor Sheila Kuehl, Los Angeles County Board of Supervisors  
Supervisor Janice Hahn, Los Angeles County Board of Supervisors  
Amy J. Bodek, Director, Department of Regional Planning  
Bruce Durbin, Supervising Regional Planner, Dept. of Regional Planning  
Timothy Stapleton, Senior Regional Planner, Dept. of Regional Planning

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<sup>6</sup> Id.

<sup>7</sup> Id.; see also Pub. Res. Code § 3106; 14 Cal. Code Regs. tit. 14, § 1714.





April 8, 2020

Amy Bodek

Director, Los Angeles County Department of Regional Planning  
320 West Temple Street, 13th Floor  
Los Angeles, California 90012

Dear Ms. Bodek:

We are writing to you today regarding the Los Angeles County Department of Regional Planning's process to update Title 22, the Planning and Zoning Code for the unincorporated parts of LA County, specifically regarding the Oil Well Ordinance. We the undersigned health, faith-based, environmental justice and community organizations represent tens of thousands of Angelenos who are deeply concerned about the impacts of neighborhood oil drilling on our health, environment and climate.

Community members are closely following the Department's efforts to amend Title 22 "in order to ensure that oil and gas facilities may no longer operate by right in the unincorporated portions of the County, and ensure that the regulations reflect best

practices and current mitigation methods and technologies, minimize environmental impacts and protect sensitive uses and populations” following [the order](#) from the Board of Supervisors on March 29, 2016.

This evaluation and process have been long overdue to protect the health and safety of residents in LA County as well as our environment from the negative impacts of urban oil drilling, including exposure to toxic emissions and dangerous chemicals. However, these efforts can only be successful with meaningful opportunity for input and feedback from the impacted communities, which is impossible in the midst of this unprecedented public health crisis.

Given the current global coronavirus pandemic and Safer at Home orders from Governor Newsom and the County Health Officer, we are seriously concerned that impacted community residents will have significantly limited ability to participate in this process. As you know, officials and health experts are encouraging County residents to implement social distancing techniques, while parents are dealing with widespread school closures. COVID-19 has also burdened communities and residents with heavy concerns such as financial and housing instability and food insecurity.

Therefore, it is our recommendation that this process be paused temporarily until the shelter in place orders have been rescinded and there are adequate time and resources to properly engage the public, especially through meaningful, well-planned and publicized in-person public hearings. This process must account for the time needed for the re-establishment of effective lines of communication between agencies and communities and for communities to adjust to an environment where public gatherings once again feel safe to attend.

Ensuring robust public participation is especially important given concerns raised by several of the undersigned organizations that public meetings held by the Department thus far have not adequately informed residents living near oil sites of the existing health risks for them or of the implications for them of policies under consideration.

Our organizations are committed to working with your office to ensure strong recommendations are implemented for LA County. Thank you for taking our request under consideration.

Sincerely,

Martha Dina Arguello

Executive Director, Physicians for Social Responsibility Los Angeles  
Co-Chair, STAND-LA Coalition

Bahram Fazeli  
Director of Research and Policy, Communities for a Better Environment  
Co-Chair, STAND-LA Coalition

Damon Nagami  
Senior Attorney, Natural Resources Defense Council

Monica Embrey  
Associate Director, Beyond Dirty Fuels, Sierra Club

David Haake  
Chair, Clean Break Committee, Sierra Club

Richard Parks  
Executive Director, Redeemer Community Partnership

Laura Muraida  
Research and Communications Director, SCOPE

Rabeya Sen  
Policy Director, Esperanza Community Housing Corporation

Eric Romann  
Coalition Coordinator, STAND-LA Coalition

Maya Golden-Krasner  
Deputy Director of the Climate Law Institute, Center for Biological Diversity

A. Bayoán Rosselló-Cornier  
Senior Program Manager, Environmental Health & Justice , Liberty Hill Foundation

CC: Honorable Los Angeles County Board of Supervisors  
Bruce Durbin, Department of Regional Planning  
Adrienne Ng, Department of Regional Planning



**Los Angeles / Orange Counties  
Building and Construction  
Trades Council**

*Affiliated with the Building & Construction Trades Dept., AFL-CIO*

1626 Beverly Boulevard  
Los Angeles, CA 90026-5784  
Phone (213) 483-4222  
(714) 827-6791  
Fax (213) 483-4419



**RON MILLER**

*Executive Secretary*

April 9, 2020

Supervisor Kathryn Barger  
500 West Temple Street - Room 869  
Los Angeles, CA 90012  
[kathryn@bos.lacounty.gov](mailto:kathryn@bos.lacounty.gov)

**Re: Draft Oil Well Ordinance**

Dear Chair Barger:

On behalf of the more than 140,000 skilled women and men within local unions and district councils across 14 Trades in the Greater Los Angeles Region, I am writing to request an extension on releasing the Los Angeles County Department of Regional Planning's Draft Oil Well Ordinance.

The Los Angeles/Orange Counties Building and Construction Trades Council consider Los Angeles County a close partner, and we urge the County to defer the release of the draft Oil Well Ordinance, at the very minimum by 90 days, to ensure our workforce can participate in this critical process that will have a tremendous impact to their livelihoods.

At this current time, our women and men are providing essential services to maintain critical energy infrastructure and ensure reliable and affordable energy supplies during the COVID-19 pandemic. I really don't want to distract our members now to participate in an extensive rulemaking process, and I believe the County has far higher priorities too.

I know you know better than anyone the effect COVID-19 has had on the physical, emotional and financial security of working families throughout the County and beyond, and we hope you will take a pause on considering the Oil Well Ordinance in order to allow our essential workers on the County's energy frontlines to focus on doing their jobs and staying healthy during this uncertain and unprecedented time.

We commend you on your leadership on COVID-19 efforts and look forward to working together with you to weather the pandemic and achieve a rapid recovery that puts Angelenos back to work soon.

Sincerely,   
Ron Miller  
Executive Secretary

CC: Supervisor Hilda Solis  
Supervisor Sheila Kuehl  
Supervisor Mark Ridley-Thomas  
Supervisor Janice Hahn

April 14, 2020

County of Los Angeles Department of Regional Planning  
Attention: Adrienne Ng, Ordinance Studies Section  
320 West Temple Street, 13th Floor  
Los Angeles, CA 90012

VIA PDF E-MAIL  
[ang@planning.lacounty.gov](mailto:ang@planning.lacounty.gov)

**Re: Oil Well Ordinance Discussion Draft**

Ms Ng:

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. We are an alliance of over 190 business associations who represent 400,000 employers with 3.5 million employees in Los Angeles County. We are writing to you to express our serious concerns with the Oil Well Ordinance discussion draft to be reviewed on April 15.

In light of the COVID-19 pandemic, it has become apparent that now is not the time to be considering additional regulations. Businesses and residents are struggling to survive during this unprecedented time and the county's sole focus should be on providing resources to help them stay afloat and to find solutions that will help bolster the economy when this pandemic lifts. As such we find it inappropriate that the county is still considering a draft ordinance that has the potential to place even more people out of work when this is over.

COVID-19 has also highlighted the need for Los Angeles County, and our state as a whole, to rely on more local resources. Specifically, we need to become more self-sufficient in essential manufactured goods, raw materials, and energy. Imposing a new set back would increase our already heavy dependence on foreign oil at exactly the wrong time. We don't know when the economy will be opening back up and when it does, we don't know when another COVID-19 or similar instance will hit. We should take lessons learned from this time to make sure we do not have shortages like this again.

The County has applied reasonable setbacks for decades, and an increase in setbacks would harm cost of living and quality of life by establishing large, reciprocal "no build" zones. Because health-based setbacks are reciprocal, this would have an enormous impact on the cost of living and quality of life in a high-density region like Los Angeles, which is already facing a deepening housing crisis. Had Los Angeles imposed a 2,500-foot setback on current oil and natural gas operations, more than 1.2 million housing units, 170 educational institutions and 7 hospitals would never have been built.

The LA City Petroleum Administrator's report acknowledges that studies have not shown a causal relationship between oil and gas production in Los Angeles and adverse health effects. It also places the cost of implementing a setback in the billions of dollars.

Thank you for your consideration of our comments. If you have any questions, please contact [sarah.wiltfong@bizfed.org](mailto:sarah.wiltfong@bizfed.org).

Sincerely,



Sandy Sanchez  
BizFed Chair  
FivePoint



David Fleming  
BizFed Founding Chair



Tracy Hernandez  
BizFed Founding CEO  
IMPOWER, Inc.



## BizFed Association Members

Action Apartment Association  
Alhambra Chamber of Commerce  
American Beverage Association  
American Hotel & Lodging Association  
American Institute of Architects – Los Angeles  
Angeles Emeralds  
Apartment Association, California Southern Cities  
Apartment Association of Greater Los Angeles  
Arcadia Association of REALTORS  
AREAA North Los Angeles SFV SCV  
Asian Business Association  
Association of Club Executives  
Association of Independent Commercial Producers  
Azusa Chamber of Commerce  
Bell Gardens Chamber of Commerce  
Beverly Hills Bar Association  
Beverly Hills Chamber of Commerce  
BNI4SUCCESS  
Boyle Heights Chamber of Commerce  
Building Industry Association, LA / Ventura  
Building Industry Association, Baldyview  
Building Owners & Managers Association, Greater LA  
Burbank Association of REALTORS  
Burbank Chamber of Commerce  
Business & Industry Council for Emergency Planning & Preparedness  
Business Resource Group  
CA Natural Resources Producers Assoc  
CalAsian Chamber  
CalCFA  
California Apartment Association, Los Angeles  
California Asphalt Pavement Association  
California Association of Food Banks  
California Bankers Association  
California Bus Association  
California Business Roundtable  
California Cannabis Industry Association  
California Cleaners Association  
California Construction and Industry Materials Association  
California Contract Cities Association  
California Fashion Association  
California Gaming Association  
California Grocers Association  
California Hispanic Chamber of Commerce  
California Hotel & Lodging Association  
California Independent Oil Marketers Association  
California Independent Petroleum Association  
California Life Sciences Association  
California Manufacturers & Technology Association  
California Metals Coalition  
California Restaurant Association  
California Retailers Association  
California Small Business Alliance  
California Society of CPAs -Los Angeles Chapter  
California Sportfishing League  
California Trucking Association  
Californians for Balanced Energy Solutions  
Carson Chamber of Commerce  
Carson Dominguez Employers Alliance  
CDC Small Business Finance  
Central City Association  
Century City Chamber of Commerce  
Cerritos Regional Chamber of Commerce  
Citrus Valley Association of REALTORS  
Commercial Industrial Council/Chamber of Commerce  
Construction Industry Air Quality Coalition  
Construction Industry Coalition on Water

Quality  
Council on Trade and Investment for Filipino Americans  
Covina Chamber of Commerce  
Culver City Chamber of Commerce  
Downey Association of REALTORS  
Downey Chamber of Commerce  
Downtown Center Business Improvement District  
Downtown Long Beach Alliance  
El Monte/South El Monte Chamber  
El Segundo Chamber of Commerce  
Employers Group  
Engineering Contractor's Association  
EXP  
F.A.S.T. - Fixing Angelenos Stuck In Traffic  
FilmLA  
Friends of Hollywood Central Park  
Fur Information Council of America  
FuturePorts  
Gardena Valley Chamber of Commerce  
Gateway to LA  
Glendale Association of REALTORS  
Glendale Chamber of Commerce  
Glendora Chamber of Commerce  
Greater Antelope Valley Association of REALTORS  
Greater Lakewood Chamber of Commerce  
Greater Los Angeles African American Chamber  
Greater Los Angeles Association of REALTORS  
Greater Los Angeles New Car Dealers Association  
Harbor Trucking Association  
Historic Core Business Improvement District  
Hollywood Chamber of Commerce  
Hong Kong Trade Development Council  
Hospital Association of Southern California  
Hotel Association of Los Angeles  
Huntington Park Area Chamber of Commerce  
Independent Cities Association  
Industry Business Council +  
Inglewood Airport Area Chamber of Commerce  
Inland Empire Economic Partnership  
International Warehouse Logistics Association  
La Cañada Flintridge Chamber of Commerce  
L.A. County Medical Association  
L.A. Fashion District BID  
L.A. South Chamber of Commerce  
Lancaster Chamber of Commerce  
Larchmont Boulevard Association  
Latino Food Industry Association  
LAX Coastal Area Chamber of Commerce  
League of California Cities  
Long Beach Area Chamber of Commerce  
Los Angeles Area Chamber of Commerce  
Los Angeles County Board of Real Estate  
Los Angeles County Waste Management Association  
Los Angeles Gateway Chamber of Commerce  
Los Angeles Gay and Lesbian Chamber of Commerce  
Los Angeles Latino Chamber of Commerce  
Los Angeles Parking Association  
Marketplace Industry Association  
Motion Picture Association of America  
MoveLA a Project of Community  
NAIOP Southern California Chapter  
National Association of Royalty Owners  
National Association of Tobacco Outlets  
National Association of Women Business Owners  
National Association of Women Business Owners – Los Angeles

National Hispanic Medical Association  
National Latina Businesswomen  
Orange County Business Council  
Pacific Merchant Shipping Association  
Pacific Palisades Chamber of Commerce  
Panorama City Chamber of Commerce  
Paramount Chamber of Commerce  
Pasadena Chamber of Commerce  
Pasadena-Foothills Association of Realtors  
PhRMA  
Planned Parenthood Southern Affiliates of California  
Pomona Chamber of Commerce  
Propel L.A.  
Rancho Southeast Association of REALTORS  
Recording Industry Association of America  
Regional Black Chamber - San Fernando Valley  
Regional Hispanic Chamber of Commerce  
Regional Chamber of Commerce-San Gabriel Valley  
Rosemead Chamber of Commerce  
San Dimas Chamber of Commerce  
San Gabriel Chamber of Commerce  
San Gabriel Valley Economic Partnership  
San Pedro Peninsula Chamber of Commerce  
Santa Clarita Valley Chamber of Commerce  
Santa Clarita Valley Economic Development Corp.  
Santa Monica Chamber of Commerce  
Sherman Oaks Chamber of Commerce  
South Bay Association of Chambers  
South Bay Association of REALTORS  
South Gate Chamber of Commerce  
Southern California Contractors Association  
Southern California Golf Association  
Southern California Grantmakers  
Southern California Leadership Council  
Southern California Minority Suppliers Development Council Inc. +  
Southern California Water Coalition  
Southland Regional Association of REALTORS  
Sunland-Tujunga Chamber of Commerce  
The Young Professionals at the Petroleum Club  
Torrance Area Chamber  
Town Hall Los Angeles  
Tri-Counties Association of REALTORS  
United Chambers San Fernando Valley & Region  
United States-Mexico Chamber  
Unmanned Autonomous Vehicle Systems Association  
US Green Building Council  
US Resiliency Council  
Valley Economic Alliance  
Valley Industry & Commerce Association  
Vernon Chamber of Commerce  
Vietnamese American Chamber of Commerce  
Warner Center Association  
West Hollywood Chamber of Commerce  
West Los Angeles Chamber of Commerce  
West San Gabriel Valley Association of REALTORS  
West Valley/Warner Center Association Chamber  
Western Manufactured Housing Association  
Western States Petroleum Association  
Westside Council of Chambers  
Westwood Community Council  
Westwood Village Rotary Club  
Whittier Chamber of Commerce  
Wilmington Chamber of Commerce  
World Trade Center Los Angeles  
Young Professionals in Energy - LA Chapt