



# 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 22, 2021

TO: Supervisor Hilda L. Solis, Chair  
Supervisor Holly J. Mitchell  
Supervisor Sheila Kuehl  
Supervisor Janice Hahn  
Supervisor Kathryn Barger

FROM: Alex Garcia, Supervisor *AG*  
Zoning Enforcement Special Projects

## **ADVISORY PANEL REPORT ON BOARD MOTION REGARDING THE OIL AND GAS STRIKE TEAM FOR UNINCORPORATED LOS ANGELES COUNTY (MARCH 29, 2016 – AGENDA ITEM NO. 12)**

On March 29, 2016, the Los Angeles County Board of Supervisors (Board) passed a motion instructing the Director of Regional Planning, in coordination with the Fire Chief, Director of Public Health, and Director of Public Works to convene a Strike Team to assess the conditions, regulatory compliance and potential public health and safety risk associated with existing oil and gas facilities in unincorporated Los Angeles County. The Board instructed the Strike Team to report back on a biannual basis with a summary of its findings and any recommendations on legislative and regulatory positions that the Board should consider.

The Board also requested that a five-member Advisory Panel be established, comprised of one appointee from each Supervisor with an expertise in oil and gas exploration and production, to work in conjunction with the Strike Team to assess the team's findings and recommendations and to provide a report to the Board on this assessment no later than 30 days after the Strike Team's report is submitted to the Board. The appointed Advisory Panel members are:

- First District Board Office appointee – Julia May
- Second District Board Office appointee – Andrew Weissman
- Third District Board Office appointee – Timothy O'Connor
- Fourth District Board Office appointee – Matt Rezvani
- Fifth District Board Office appointee – R. Rex Parris

Each Supervisor  
April 22, 2021  
Page 2

The Advisory Panel meeting was held on April 20, 2021 to discuss the Advisory Panel's assessment of the Strike Team's report. The Advisory Panel members who participated in the meeting were:

- First District Board Office appointee – Julia May
- Third District Board Office appointee – Timothy O'Connor
- Fourth District Board Office appointee – Matt Rezvani

This submittal includes the Advisory Panel's assessment of the Strike Team's ninth biannual report, including written comments from Advisory Panel members appointed by the First and Third Supervisorial Districts. The Advisory Panel report can be accessed on DRP's web page at [planning.lacounty.gov/oil-gas/strike](http://planning.lacounty.gov/oil-gas/strike).

The next Oil and Gas Strike Team report to the Board is due on September 29, 2021, and the Advisory Panel report will follow no later than 30 days after that date. Should you have any questions about this report, please contact Ai-Viet Huynh, Zoning Enforcement Special Projects section, at [ahuynh@planning.lacounty.gov](mailto:ahuynh@planning.lacounty.gov).

AG:ah

Attachment: [planning.lacounty.gov/assets/upl/project/oil-gas\\_advisory-panel\\_20210422-report.pdf](http://planning.lacounty.gov/assets/upl/project/oil-gas_advisory-panel_20210422-report.pdf)

c: Executive Office, Board of Supervisors  
Chief Executive Office  
County Counsel  
Department of Public Works  
Department of Public Health  
Fire Department

FIRST DISTRICT  
ADVISORY PANEL MEMBER  
JULIA MAY  
COMMENTS

Date: 4/13/2021

From: Julia E. May, First District Repres., LA County Oil & Gas Strike Team Advisory Committee

To: Ai-Viet Huynh, Regional Planner, Advisory Committee Members, and Board of Supervisors, Los Angeles County Oil & Gas Strike Team

Re: **Comments on Oil and Gas Assessment Project Phase II – Report 4**, March 21, 2021, (Report # 9 in full series), County of Los Angeles, regarding Abandoned & Orphaned Wells, Pipelines, Oil & Gas Storage, and Hazardous Materials use

The following are my preliminary comments, which may be supplemented by discussion during the upcoming O&G Strike Team Advisory Committee planned for April 20<sup>th</sup>, 2021.

1. **Once again, a great deal of important documentation on specific hazards has been carried out through this latest report, despite the very hard year of 2020** (for wells – hazards related to pressure, H2S presence, community characteristics, age, production and accident history, abandonment, idling, etc., as well as hazards from pipelines, oil and gas storage, and chemical use). Over time, this site-specific information has added substantially to the body of evidence regarding hazards from oil and gas operations in unincorporated parts of the County, much of which was previously very hard-to-access information buried in hard copy files, or entirely missing. In addition, the severe challenges of 2020 hampered Strike Team efforts, including in-person inspection (among other more extreme burdens of the year). It is important to acknowledge barriers as well as important progress as we look forward to better times.
2. **However, the overall Strike Team process which began in 2016, has been too slow-moving in reaching the point of action, to reduce and eliminate Oil and Gas hazards that continue to threaten local, regional, and planetary health and safety.** Low-income and communities of color are disproportionately impacted by Oil and Gas operations and associated well-to-wheel impacts of fossil fuels, including toxic emissions, smog-forming chemicals, odors, greenhouse gases, hazardous chemical transport, and climate impacts. These dangers cannot be treated separately, as if they exist in a vacuum. Last year brought home the immediate and severe dangers of climate change, during the out-of-control wildfires and other fossil-fueled disasters. Latinx, Black, Indigenous, other people of color are hardest hit. The body of evidence documenting these racial inequities and widespread health and environmental hazards is extensive; I will not try to repeat them in this short memo.
3. **At the same time, the pandemic highlighted options to accelerate clean energy, and some fossil fuel operations have even closed.** This begs the question – will the Strike Team move beyond evaluation only of separate components of hazards in oil and gas operations? The times have moved beyond that--even the oil industry is discussing phaseout. I urge that the Strike Team broaden the discussion to include the much-needed fossil fuel phaseout and Just Transition.
4. **Los Angeles County adopted a sustainability plan and goals, including “A fossil-free LA County”, which states: “By eliminating fossil fuels, we are seeking to mitigate global climate change and its impacts throughout the region.”**<sup>1</sup> Similarly, the Strike Team should include this goal and begin evaluating how to carry this out.

---

<sup>1</sup> *Our County, Los Angeles Countywide Sustainability Plan*, August, 2019, Goal 7: A fossil fuel-free LA County, p. 104, <https://ourcountyla.lacounty.gov/wp-content/uploads/2019/07/OurCounty-Final-Plan.pdf>

5. **Disadvantaged communities of color in the region and statewide, are clamoring for phaseout of drilling in California. It is time for the Strike Team to also begin to evaluate how to phase out Oil and Gas operations, not just incrementally mitigate impacts.** This is also consistent with the State of California's climate goals, and with the County's sustainability and Environmental Justice goals.
6. The County Sustainability Plan's Goal #1 is to establish: **"Resilient and healthy community environments where residents thrive in place. The County will protect low-income communities and communities of color from pollution, reduce health and economic inequities, and support more resilient and inclusive communities."** Fossil fuel operations are inherently at odds with this goal; phaseout plans need to be developed as soon as possible.
7. **My past comments, and those of my fellow Advisory Committee Members have not been fully addressed.**
8. **One example – In past comments, I documented pipeline spills in Wilmington which caused severe odors and health hazards through quantities of crude oil spilled directly onto residential streets.** Pipelines cross between unincorporated and incorporated areas, so those spills are relevant to unincorporated areas. It would be useful to include documentation of the Wilmington pipeline spills and reasons for the rupture in the next report, as well as identifying whether these risks are present in unincorporated areas.
9. **Earthquake risks increase all the hazards identified –** these need to be evaluated and updated.
10. **Thank you to Matt Rezvani, fellow Advisory Committee member, for providing expertise on pipelines and other matters to the team.**

Thank you to the County staff and consultants, the Advisory Committee Members, and the County Board of Supervisors for consideration and extensive work to eliminate these widespread hazards.

**Julia E. May, First District Representative, Advisory Committee, LA County Oil & Gas Strike Team** (Senior Scientist, Communities for a Better Environment, CBE, [julia@cbeocal.org](mailto:julia@cbeocal.org) )

Date: **4/21/2021**

*Supplemental Comment on Report #9*

From: Julia E. May, First District Repres., LA County Oil & Gas Strike Team Advisory Committee

To: Ai-Viet Huynh, Regional Planner, Advisory Committee Members, and Board of Supervisors, Los Angeles County Oil & Gas Strike Team

Re: **PART 2 - Comments on Oil and Gas Assessment Project Phase II – Report 4, March 21, 2021**, (Report # 9 in full series), County of Los Angeles, regarding Abandoned & Orphaned Wells, Pipelines, Oil & Gas Storage, and Hazardous Materials use

**These are to supplement my written comments of 4/13/2021**, and to memorialize some of the points brought up by fellow Advisory Committee members, myself, the consultant, and staff, in the useful discussion yesterday.

1. **Regarding the potential for oil and gas operation phaseout, consistent with the County Sustainability plan, several helpful steps were discussed yesterday:**
  - a. **In the next report, it would be helpful to list new policies developed since the Strike Team process began** which impact this process (including phaseout, the County Sustainability plan goals, and perhaps other policies).
  - b. **Identifying Oil and Gas operations which are out of compliance with existing regulatory requirements or which are idled operations, would be useful information to consider as part of phaseout, in order to eliminate potential hazards and harmonize with fossil-free goals.** This may include non-compliance related to fees, record-keeping, inspection, safety, leaks, odors, chemical usage, and other requirements, and may include idled operations that are generally in compliance (but out of use). These could represent one body of candidates for permanent closure. For example, long-idled pipelines and drilling operations, many which have been idle for years or decades, represent hazards over time that should be eliminated, and are especially incompatible with residential communities. Seismic risks in the region continually increase these risks, and this is especially problematic in already pollution-burdened communities of color. **This can be in addition to evaluation of phaseout of other priority hazardous operations, as additional steps in the broader fossil fuel phaseout plan.**
2. **Pipeline sulfur content (e.g. H2S and others) would be useful information to have for individual pipelines**, since this can drastically increase corrosion. Although the County doesn't presently have this data, discussion indicated that industry may have some of this information available (e.g. Kinder Morgan).
3. **Considering the Wilmington pipeline ruptures which resulted in residential streets being covered by highly odorous crude oil, sickening people**, would be useful. (See my April 2019 comments.) The causes would help evaluation of rupture risks in unincorporated areas, especially since pipelines cross jurisdictions. The consultant provided a helpful commitment to follow-up.
4. **It will be important to have extended review time on the next draft Strike Team report, especially since this is expected to be the final report, with final recommendations.** Inspections had to be postponed due to the pandemic, so some information won't be available until this next draft. The Advisory Committee could also be invited to participate directly in the final Strike Team meeting, before the final Advisory Committee meeting.

Thank you again for all the hard work developing the body of data and analysis.

-- **Julia E. May, First District Representative, Advisory Committee, LA County Oil & Gas Strike Team**  
(Senior Scientist, Communities for a Better Environment, CBE, [julia@cbeocal.org](mailto:julia@cbeocal.org) )

THIRD DISTRICT  
ADVISORY PANEL MEMBER  
TIMOTHY O'CONNOR  
COMMENTS

April 21, 2021

Ai-Viet Huynh  
Regional Planner, Los Angeles County  
By EMAIL: [AHuynh@planning.lacounty.gov](mailto:AHuynh@planning.lacounty.gov)

**Subject: Comments from Tim O'Connor (3<sup>rd</sup> District Rep., LA County Oil & Gas Strike Team Advisory Committee) on the March 21, 2021 Oil and Gas Assessment Project Phase II Report, (Report # 9)**

Dear Ms. Huynh and members of the LA County Oil & Gas Strike team,

Please accept these comments on the March 21, 2021 Oil and Gas Assessment Project Phase II Report, (Report # 9). I submit these comments in my personal capacity as the 3<sup>rd</sup> District Representative on the Advisory Committee. Although these comments are my own, they are formed by years of experience working on oil and gas issues in California for my present employer the Environmental Defense Fund, and in prior experience before that.

As a high level observation, I commend the Strike Team and the professional services firm MRS for its continued examination of the public health, safety and environmental issues facing oil and gas production in Los Angeles County. The multi-year examination has resulted in significant amounts of data and observations, and will no doubt lead to important recommendations that can shape the course of oil and gas production, transmission and storage in the region forever. As the region grapples with the continued need to reduce climate pollution, improve air quality, reduce community exposure to toxic materials, protect water quality, and support economic growth, the findings and recommendations of this effort can serve as a basis for the future of oil and gas within that paradigm.

Given the level of investment that has gone into this effort over the last 4 years, it is clear that the deliberations that go into the final report should not follow that same form and substance as has been used for the prior eight.

In particular, as has been noted in the past, while the Advisory Panel is afforded the opportunity to comment on the report, that opportunity generally takes the form of an add-on comment after the report has been developed and finalized by the consultant MRS, and not in the deliberative or development phase. Accordingly, it is unclear whether and to what extent the input from the Advisory Panel will be incorporated, if at all, into the findings and recommendations for policies and actions of the final report. As a result, as was raised in the April 20, 2020 meeting, I recommend the Advisory Panel be afforded the ability to have all members attend the Strike Team meeting to discuss the final report in an open and public forum, and to engage in a deliberative process with the members of the Strike Team.

In addition to ensuring effective participation by the Advisory Panel in the development of the final report's conclusions and recommendations, I also recommend the next three months include an examination of the changed circumstances that have occurred in the Los Angeles region as it relates to oil and gas production, and incorporate observations about those changes into the final report and



recommendations. In particular, the final report should include an examination of the scope and precedent of recent actions of both Culver City (moratorium and phase out of oil and gas production) and Los Angeles City (moratorium on new drilling) and evaluate whether the Strike Team report should incorporate similar actions into its recommendations. Making sure final report catalogues major changes in science and policy in the region since the initiation of the Strike Team process is important to ensuring a robust final product that leads to an effective decision-making process.

As it relates to the content of Report # 9, once again I commend the team for an excellent job. In addition, prior to the final report being issued, I offer the following comments.

- As it relates to oil and gas idle and abandoned wells, it is unfortunate that the inspection data could not be collected for high priority wells prior to the development of the March 2021 report. Since the next report will be the final, it is important that the Strike Team and Advisory Panel be afforded the opportunity to see the data from the inspections prior to the final report and recommendations being written. In short, the Strike team spent significant effort to develop a prioritization matrix for well identification and inspection, and the results of that process should be incorporated into the final report in a deliberative manner. Those inspections, which will be done on the wells that are the most susceptible to leakage and human health exposure are the culmination of an important process that can shape policy going forward. Accordingly, I respectfully request MRS proactively release the data as soon as it is available, and before the development of the report recommendations.
- As it relates to pipeline inspections, while the report and presentation make it clear that MRS evaluated pipelines based on a range of factors, it appears that the status of pipeline compliance with requirements to maintain their franchise agreements (payment and renewal) was not part of the review. Whether a pipeline operator maintains basic upkeep of its ability to operate its pipelines in compliance with contractual obligations and easements should be considered a core indicia of the focus and attention it pays to its obligations to protect the public health, safety and the environment in other contexts – such as through inspection and maintenance. As a result, I recommend the review of pipelines be expanded to include review of this material prior to final conclusions being made.

Thank you for considering these points.

Sincerely,



Tim O'Connor  
3<sup>rd</sup> District Representative, Los Angeles Oil and Gas Strike Team Advisory Panel