



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
SHEILA KUEHL
JANICE HAHN
KATHRYN BARGER

Correspondence Received

Agenda #	Relate To	Position	Name	Comments
The following individuals submitted comments on agenda item:				
8.		Favor	Fred Brown	
			Gladys Delgadillo	<p>The Center for Biological Diversity submits the following attachments in support of agenda item 8.</p> <p>The first is a petition from Los Angeles County residents, and Center supporters, urging the Board to phase out oil drilling throughout the County (including the Inglewood Oil Field) within 5 years. It has been collecting signatures since the Board's first motion on this topic.</p> <p>The second is an excel sheet w/ comments our supporters submitted specifically in response to agenda item 8, once the agenda item was posted.</p> <p>Please let me know if you have any questions.</p> <p>Thank you for your consideration.</p> <p>Sincerely, Gladys Delgadillo (she/her) Organizer, Climate Law Institute Center for Biological Diversity</p>
			Paulina Torres	
		Oppose	Ben T	Bring down our gas prices. Stop sending our California oil to China and Ukraine.
		Debra Layton	<p>September 26, 2022</p> <p>The Honorable Board of Supervisors County of Los Angeles 383 Kenneth Hahn Hall of Administration 500 W Temple Street Los Angeles, CA 90012</p> <p>RE: Hearing on Project No. PRJ2020-000246-(1-5) and Advance Planning Case No. RPPL2020000624-(1-5) Signal Hill Petroleum is providing the following comments relating to the Los Angeles County proposed amendment to the Oil Well Ordinance. We ask that these comments be made part of the record of proceedings regarding this ordinance.</p> <p>Signal Hill Petroleum is a privately owned, California-based energy group specializing in responsible and sustainable exploration, development, and production of oil and gas in Southern California. All of Signal Hill Petroleum's production goes to local refineries and returns to the region as the critically</p>	



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
SHEILA KUEHL
JANICE HAHN
KATHRYN BARGER

Correspondence Received

			<p>important liquid transportation fuels: gasoline, diesel and jet fuel.</p> <p>Our comments are:</p> <ol style="list-style-type: none"> 1. Application of Amortization is Improper <ol style="list-style-type: none"> a. Amortization constitutes an unconstitutional taking of private property without just compensation. 2. The finding of a Public Health Risk is not supported. The studies cited to support the ordinance did not: <ol style="list-style-type: none"> a. Show evidence of harm from traditional wells operated in California. b. Account for environmental health factors other than oil operations such as effects proximity to transportation corridors and proximity to other industries and commercial uses. c. Conduct actual air sampling and analysis. 3. The determination of a Categorical Exemption per CEQA is flawed and incorrect. 4. The determination that the ordinance has no potential for causing a significant effect on the environment is not justified. The ordinance will have significant impacts on the environment. 5. The ordinance will most likely increase the prices for gasoline and diesel in Southern California. <p>According to the US Energy Administration, oil inventory on the West Coast is at its lowest level in about a decade while gas prices are continuing to rise. California electricity prices are amongst the highest in the nation, the Russian Ukraine war adds extreme uncertainty to the global energy market and our national security is at risk. The Oil Well Ordinance you decide today will only exacerbate the unnecessary energy mess that the State of California has created. The policy decisions you make could make affordable energy UNATTAINABLE for Angelinos.</p> <p>Please consider your role when an Angelino must take transportation to work to support their family, or when they need heat or cool their home or are looking for employment with no college degree and find work in the oil and gas industry. We urge you all to support the California families and not pass this politically driven ordinance based on misinformation.</p> <p>Sincerely,</p> <p>Debra Montalvo Layton Vice President Signal Hill Petroleum</p>
	Eloy Armendariz		
	Jacob Itzkowitz		
	Jennifer Heighton	If adopted, this ordinance would bring about the phase out of oil and gas production in Los Angeles County and result in the condemnation of our private property. I understand, and fully agree, that protecting the public is an	



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
SHEILA KUEHL
JANICE HAHN
KATHRYN BARGER

Correspondence Received

	important goal, however, I am also concerned that the revenue we receive from oil production, that has helped us to support our property for many years, will be coming to an end. Our property was purchased by my Great Grand Father in 1911. The property has been a treasured family retreat for 111 years. If you are going to take away my mineral rights, I feel that I should be compensated accordingly. We will be forced to sell our property if we don't have the income to help support it. Thank you for your time and consideration.
Jessica Paquette	This ordinance is going to force small operators into Bankruptcy and the county is going to get stuck with orphan wells. With SB1137 why is the county taking the litigation risk. Let the state take control
Jessica Paquette	
Jonathan Gregory	
Kary Weybrew	There is no safe oil well drilling or fracking in our neighborhoods. This has been clearly demonstrated in many states and communities. Drinking water, unsettling our earth's foundation, natural gases, it is not worth the trouble it stirs up. Regardless of what "cost" or "reliance" on foreign or domestic oil producer, it is clear California is moving to become NOT reliant on fossil fuels by moving to NO fossil fuels by not selling gas dependent cars by 2035 so why would we move to loosen our regulations on this? This is clearly a financial move if passed and not one that is meant to enhance our environment or the health of our residents of our communities.
Oliver Sweningsen	
Pamela C McVicar	Please protect small minority businesses and oppose the oil well ordinance. These businesses are critical to the economic viability of our community
Pamela C McVicar	I recommend delaying a vote on this ordinance until a complete evaluation of the full life-cycle economic consequences of this ordinance to all stakeholders is completed.
Ralph Combs	Please see the attached letter in opposition to the Oil Well Ordinance. Thank you.
Sarah Taylor	Please see attached comment letter.
Scott R Evans	Please see attached PDF letter
Seth D Briones	The oil industry has provided for me and my 3 siblings and continues to do so for my wife and 3 children as I am a second generation oilfield worker. I grew up right next door to the field that I have currently operated for 25 years. My entire 42 years I have been in or near oil and have zero health effects to speak of. The thought of my livelihood being taken away is a terrifying reality that would devastate mine and thousands of other families. I strongly OPPOSE this ordinance because it would be another step in completely eliminating the industry that has been the life blood of my entire family.
Sigrid Waggener	



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
SHEILA KUEHL
JANICE HAHN
KATHRYN BARGER

Correspondence Received

		Silas A Briones	<p>I am opposed to this Ordinance.</p> <p>I've had the opportunity to work at an oil facility for 42 years, and also have been a resident in the city of Whittier for over 40 years. My family and I are of Hispanic ethnicity. In the city of Whittier oil wells have been part of this community since the 1900's and have provided employment for me and others. In all the years working at the oil facility, and living directly next-door to one, neither myself or my family members have experienced health issues or have been diagnosed by a professional licensed medical/ health official stating we have had any health issues related to the drilling of the oil facility. Having the opportunity to work at this facility has provided my source of income to provide for me and my family of Hispanic ethnicity. Opposing this Ordinance, will continue to allow for future employment, supply source of energy to homes and fuel, lead to a better economy, and reduces us to rely on Foreign OIL.</p>
		Theodore Cordova	Letter submitted
		Wayne Brechtel	
	Other	Glenn La Fevers	
		Josue Aguilar	<p>Dear County Board of Supervisors:</p> <p>Please accept these 223 public comments from LA County members and online activists of the Natural Resources Defense Council (NRDC) urging you to support the ordinance that prohibits new wells and phases out existing oil drilling in Los Angeles. Right now, there are nearly 7000 active and idle oil wells throughout Los Angeles and 3.8 million residents live within a quarter mile of drilling operations. Los Angeles communities of color and low-income communities live disproportionately near oil and gas wells and suffer greater health harms. Neighboring communities suffer from both the acute and chronic harms associated with oil drilling. These include but are not limited to headaches, nausea, nosebleeds, respiratory disease, preterm birth, and cancer.</p> <p>Los Angeles is already overburdened with poor air quality and industrial drilling operations are a major contributor. These sites are known to emit toxic hydrogen sulfide gas, known carcinogens, and endocrine disruptors. Further, the risk of catastrophes like chemical leaks, toxic releases, and explosions create an immediate threat to surrounding communities. Even worse, these operations are often taking place right next to schools, hospitals, and homes.</p> <p>We need immediate steps to prioritize the health and safety of L.A. residents. By preventing new wells from being drilled and phasing out existing operations, we can take a huge step forward to better protect our communities.</p> <p>Please support the ordinance that bans new wells and phases out oil drilling in Los Angeles.</p>

				Thank you,
		Item Total	25	
Grand Total			25	

September 21, 2022

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street,
Room 381B
Los Angeles, CA 90012

Re: Oil Well Ordinance / Project No 2020-000246-(1-5)
Case No RPPL2020000624

Honorable Board of Supervisors:

This office represents Christopher Hayes, who in his capacity as Trustee of the Orcutt Trust, represents the owners of a 50% interest in an approximately 640-acre property in the County of Los Angeles commonly known as Oat Mountain Ranch property (“Ranch”). This, and other properties in the area, have been the site of the responsible operation of oil wells for at least 80 years. Owners of Oat Mountain Ranch depend on royalties from the continued operation of oil wells operated by the Termo Company. The unilateral termination of those rights as proposed would impose an unfair and unnecessary hardship for our clients that can and should be avoided.

As an initial matter, the regulations do not seem to be applied in a uniform manner, as certain landowners have been arbitrarily exempted from the regulations.

We support the detailed and thoughtful comments that have been submitted by the Termo Company regarding the merits of the proposed Oil Well Ordinance. Of particular importance is the negative impact the proposed regulations would have on air quality in California and the reduction of greenhouse gases worldwide. Reducing the consumption of oil and gas is a long-term process that requires development of alternative means of providing energy, a process that is underway. However, the need for oil and gas will continue into the foreseeable future and shutting down local oil production will not shut down local oil consumption. The only difference will be increased importation of oil and gas from foreign oil companies that do not adhere to the strict environmental regulations applied to local producers.

Areas Of Practice

Real Estate
Estate Planning &
Administration
Business
Land Use &
Environmental
Litigation
Public Agency

Attorneys

D. Wayne Brechtel
Kristen McBride
Jason R. Schingler
Tomer T. Gutman
Gregory L. Murrell
Of Counsel
D. Dwight Worden
Retired
W. Scott Williams
Retired

Office

462 Stevens Avenue
Suite 100
Solana Beach
California 92075
(858) 755-6604
wordenwilliams.com



The use of CEQA exemptions 15301, 15308 and 15061 is not appropriate, given the unusual circumstances of this proposal and the potential for significant indirect and cumulative impacts that could result from the proposed termination of local oil and gas supplies. (CEQA Guidelines § 5300.2 subd. (b) and (c).)

We urge you to take a step back and either reject the proposed Oil Well Ordinance outright or delay its consideration until after an environmental impact report (EIR) that fully considers the potential impacts of the proposed law can be prepared.

Very truly yours,
WORDEN WILLIAMS LLP

D. Wayne Brechtel

D. Wayne Brechtel, Esq.

CC: Client

September 21, 2022

Dear Supervisor Janice Hahn and LA County Board of Supervisors,

Regarding Oil Well Ordinance, PRJ2020-000246, Plan No. RPPL2020000624, September 27, 2022 Meeting:

Thank you for allowing me to enter public comment on the proposed oil ordinance.

I am a 33 year resident of La Habra Heights, and I am an elected Director and Vice-President of the La Habra Heights County Water District. My family has lived in La Habra Heights for 4 generations. I raised my children in this beautiful city.

I live next door to one of Matrix Oil's operating well sites in the city of La Habra Heights and can report that they are excellent neighbors and are a benefit to the community. I encourage any Los Angeles County Supervisors or staff member to visit my home to see how little impact the wellsite has on my enjoyment of my property.

Residents of La Habra Heights receive over \$1,000,000/year in royalties from Matrix Oil Company, and over 60% of them voted in favor of maintaining oil operations in La Habra Heights when we had a ballot initiative to eliminate oil operations in our city.

Matrix Oil Company participates in our community events including being a Platinum Sponsor of La Habra Meals on Wheels and the La Habra Heights Improvement Association's Music in the Park Summer concert series. I am on the Board of Directors of both of these organizations and have been very impressed by Matrix's involvement and support in our community.

I think that Los Angeles County should be supporting partnerships with minority businesses that provide financial benefit to the community and employment opportunities for Los Angeles County residents, rather than eliminating these businesses.

I personally urge you to vote NO on the proposed Oil Ordinance.

Thank you again for allowing me the opportunity to comment.

Sincerely,

Pamela McVicar

Director and Vice President, La Habra Heights County Water District

Treasurer, La Habra Meals on Wheels

Director, La Habra Heights Improvement Association

2253 Hillside Ct., La Habra Heights, CA 90631

Phone: 714-504-3415

Email: pmcvicar@earthlink.net

From: [ExecutiveOffice](#)
To: [PublicComments](#)
Cc: [ExecutiveOffice](#)
Subject: FW: Community Prevention & Population Health Task Force SUPPORT for Oil Well Ordinance (Plan No. RPPL2020000624)
Date: Friday, September 23, 2022 7:28:14 AM
Attachments: [CPPH TF Oil Well Ordinance Letter_092222.pdf](#)

From: Nagami, Damon <dnagami@nrhc.org>

Sent: Thursday, September 22, 2022 10:30 AM

To: First District <firstdistrict@bos.lacounty.gov>; Holly J. Mitchell <HollyJMitchell@bos.lacounty.gov>; Sheila <Sheila@bos.lacounty.gov>; Supervisor Janice Hahn (Fourth District) <fourthdistrict@bos.lacounty.gov>; Barger, Kathryn <Kathryn@bos.lacounty.gov>

Cc: ExecutiveOffice <ExecutiveOffice@bos.lacounty.gov>; Cespedes, Anthony <ACespedes@bos.lacounty.gov>; Weinberg, Elise <EWeinberg@bos.lacounty.gov>; Vera, Yolanda <YVera@bos.lacounty.gov>; Jew, Jessica <JJew@bos.lacounty.gov>; Shultz, Elan <EShultz@bos.lacounty.gov>; Cohen, Stephanie <SCohen@bos.lacounty.gov>; Butler, Katie <KButler@bos.lacounty.gov>; Mockeridge, Julia <JMockeridge@bos.lacounty.gov>; Corey, Anders <ACorey@bos.lacounty.gov>; Vartanian, Natalie <NaVartanian@bos.lacounty.gov>; Laura Muraida <LMuraida@bos.lacounty.gov>; Gutierrez, Claudia <ClGutierrez@bos.lacounty.gov>; Freeman, Sophie <SFreeman@bos.lacounty.gov>; Zapata, Danielle <dzapata@bos.lacounty.gov>; Pasebani, Aydin <AyPasebani@bos.lacounty.gov>; Amy J. Bodek <ABodek@planning.lacounty.gov>; Connie Chung <cchung@planning.lacounty.gov>; Bruce Durbin <bdurbin@planning.lacounty.gov>; Adrienne Ng <ang@planning.lacounty.gov>; Gary Gero <GGero@ceo.lacounty.gov>; Barbara Ferrer <bferrer@ph.lacounty.gov>; Liza Frias <LFrias@ph.lacounty.gov>; Christine De Rosa <cderosa@ph.lacounty.gov>; Charlene Contreras <chcontreras@ph.lacounty.gov>; Joshua Bobrowsky <jbobrowsky@ph.lacounty.gov>; Noel Barakat <nbarakat@ph.lacounty.gov>; Sonya Vasquez <SVasquez@ph.lacounty.gov>; Susan Blackwell <sblackwell@ph.lacounty.gov>; Jocelyn Ramirez <JRamirez@ph.lacounty.gov>; MissyNiturescu@nevhc.org; Frazzini, Ali <AFrazzini@cso.lacounty.gov>

Subject: Community Prevention & Population Health Task Force SUPPORT for Oil Well Ordinance (Plan No. RPPL2020000624)

Dear Supervisors:

On behalf of the Los Angeles County Community Prevention and Population Health Task Force, please find the attached letter in **SUPPORT** of the proposed Oil Well Ordinance (9/27/22 BOS meeting, agenda item #8). As a reminder, the Task Force is comprised of public health experts, healthcare providers, academics, and executives and staff from local, state, and national organizations, and advises this Board, the Alliance for Health Integration, and the Department of Public Health on public health priorities, initiatives and practices and provides guidance on primary strategies for improving population health to promote healthy, equitable communities.

Thank you for considering our views and feel free to contact either of us if you have any questions.

Respectfully,

Damon Nagami and Missy Nitescu

Co-Chairs, Community Prevention and Population Health Task Force



COUNTY OF LOS ANGELES COMMUNITY PREVENTION AND POPULATION HEALTH TASK FORCE

COMMUNITY PREVENTION AND POPULATION HEALTH TASK FORCE

313 N. Figueroa St., Suite 708
Los Angeles, CA 90012
(213) 288-8556
www.TaskForce.ph.lacounty.gov

TASK FORCE CO-CHAIRS

Damon Nagami
Missy Nitescu

September 22, 2022

The Honorable Board of Supervisors
County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

OIL WELL ORDINANCE, PLAN NO. RPPL2020000624 – SUPPORT

Dear Supervisors:

As members of the Community Prevention and Population Health Task Force (Task Force), we write to express our support for the proposed Oil Well Ordinance that would prohibit all new oil wells and production facilities and designate all existing oil wells and production facilities as nonconforming uses on unincorporated County lands. Comprised of public health experts, healthcare providers, academics, and executives and staff from local, state, and national organizations, the Task Force advises the Board of Supervisors, the Alliance for Health Integration, and the Department of Public Health on public health priorities, initiatives and practices and provides guidance on primary strategies for improving population health to promote healthy, equitable communities.

The Board's adoption of the proposed Oil Well Ordinance is essential to protect community health within the County and is consistent with the growing body of scientific literature that demonstrates the risks and dangers of allowing oil drilling near homes, schools, and other sensitive sites. In unincorporated Los Angeles County, there are nearly 2,000 active and idle oil and gas wells, the majority of which are located within 2,500 feet of homes, schools, and hospitals, and more than half a million County residents live within one-quarter mile of an actively producing oil and gas well. It is County residents in communities of color, however, who live disproportionately near oil and gas wells and suffer greater health harms: specifically, 44 percent of Black, 37 percent of Latino, and 38 percent of Asian residents live near oil and gas wells, compared to 31 percent of White residents.¹ In adopting

¹ Srebotnjak, Tanja and Miriam Rotkin-Ellman, "Drilling in California: Who's at risk?," Natural Resources Defense Council, October 2014, p. 4. <https://www.nrdc.org/sites/default/files/california-fracking-risks-report.pdf>

Community Prevention and Population Health Task Force Members:

Dahlia Alé-Ferlito · Dr. Oliver Brooks · Celia Brugman · Russia Chavis · Grace Cotanco · Augusto Dolce · Kenny Green · Anisha Hingorani · Naomi Iwasaki · Nomsa Khalfani · Margaret B. Martinez · Chad Monk · Jovita Murillo · Damon Nagami · Theresa "Missy" Nitescu · Dr. Gilda Noori · Jennifer Ponce · Cori Racela · Hector M. Ramirez · Venezia Ramirez · Tiara Sigaran · Benjamin Torres · Debra M. Ward

the proposed Oil Well Ordinance, the Board will be protecting County residents from harmful local pollution that unduly burdens workers, low-income communities, and communities of color.

This Task Force has been following the development of this ordinance since at least 2018, when we formed an Ad Hoc Committee to advocate for the protection of public health near neighborhood oil and gas sites. Since then, this Oil Well Ordinance has been improved significantly, thanks to this Board's unprecedented actions last September to pass a set of motions to begin phasing out oil drilling across Los Angeles County; the diligent and thoughtful work to implement those motions that has been carried out by the Department of Regional Planning, the Department of Public Health, and other agencies; and the frontline communities and advocates who have been pushing for proactive health-first policies like this one for years. We thank this Board for your commitment to make Los Angeles County a healthier place for all, particularly for residents most impacted by the harmful pollution and operational hazards associated with oil production. We urge you to adopt the proposed Oil Well Ordinance and look forward to our continued collaboration.

Respectfully,



Damon Nagami, JD
Task Force Co-Chair



Theresa (Missy) Nitescu, MS, RDN, CHSP
Task Force Co-Chair

Cc: Board Deputies
Community Prevention and Population Health Task Force
Executive Office, Board of Supervisors
Los Angeles County Chief Sustainability Office
Los Angeles County Department of Public Health
Los Angeles County Department of Regional Planning



LA County Board of Supervisors
500 West Temple Street
Room 383
Los Angeles, CA 90012

Submitted via email to: cpc@lacity.org

Dear County Board of Supervisors:

Please accept these 223 public comments from LA County members and online activists of the Natural Resources Defense Council (NRDC) urging you to support the ordinance that prohibits new wells and phases out existing oil drilling in Los Angeles. Right now, there are nearly 7000 active and idle oil wells throughout Los Angeles and 3.8 million residents live within a quarter mile of drilling operations. Los Angeles communities of color and low-income communities live disproportionately near oil and gas wells and suffer greater health harms. Neighboring communities suffer from both the acute and chronic harms associated with oil drilling. These include but are not limited to headaches, nausea, nosebleeds, respiratory disease, preterm birth, and cancer.

Los Angeles is already overburdened with poor air quality and industrial drilling operations are a major contributor. These sites are known to emit toxic hydrogen sulfide gas, known carcinogens, and endocrine disruptors. Further, the risk of catastrophes like chemical leaks, toxic releases, and explosions create an immediate threat to surrounding communities. Even worse, these operations are often taking place right next to schools, hospitals, and homes.

We need immediate steps to prioritize the health and safety of L.A. residents. By preventing new wells from being drilled and phasing out existing operations, we can take a huge step forward to better protect our communities.

Please support the ordinance that bans new wells and phases out oil drilling in Los Angeles.

Thank you,
Josue

JOSUE AGUILAR
*Communications Assistant,
Digital Advocacy & Fundraising*

NRDC & NRDC ACTION FUND
1314 2nd St,
Santa Monica, CA 90401
T 646.889.1402
F 212.727.1773
JAGUILAR@NRDC.ORG
NRDC.ORG
NRDCACTIONFUND.ORG

NATURAL RESOURCES DEFENSE COUNCIL

40 W 20TH STREET | NEW YORK, NY | 10011 | T 212.727.2700 | F 212.727.1773 | NRDC.ORG



LONG BEACH CORPORATE OFFICE
P.O. Box 2767, Long Beach, CA 90801
562.595.7401 562.426.2730
MAIN ⊥ FAX
www.TERMOCO.com

September 26, 2022

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 869
Los Angeles, CA 90012

Via Email
Via Public Portal Submittal

RE: Los Angeles County Board Agenda Item #08 – Hearing on Project No. PRJ2020-000246-(1-5) for the Oil Well Ordinance

Honorable Board of Supervisors,

On behalf of The Termo Company, I am writing to express our absolute opposition to Agenda Item #08 which, if adopted, will bring about the phase out of oil and gas production in Los Angeles County. This blanket policy change is unwarranted and short-sighted. Moreover, this ordinance illegally condemns and takes real property from mineral interest owners without offering compensation for that taking as required by the law.

In the last 12 months, Termo has paid over \$1.7 million to our mineral owners and royalty recipients from our operations in unincorporated Los Angeles County. Many of these royalty owners rely on this income to supplement their retirement and Social Security benefits.

The Department of Regional Planning, in drafting this ordinance, has not engaged in a valid and transparent public consultation with the mineral owners. If the County were to condemn or exercise eminent domain over a private property, such as a private residence, for a park or other public project, they would notify the property owners by letter. They wouldn't just show up one day and bulldoze the house. Yet that is what the County, through this ordinance, is doing. It is disingenuous for the Department of Regional Planning to hide behind the Brown Act and a few newspaper postings. Takings and condemnation require just compensation, and this includes for zoning changes that limit the way property can be used. Further, there are potential significant unintended consequences from this ordinance, including lost jobs, lost tax revenue, litigation, and increased economic burdens for the citizens of Los Angeles. Therefore, we ask that the Board postpone the vote on this motion in favor of a continuance to allow for key stakeholder consultation and additional study. In addition to notifying all mineral owners of the condemnation of their property, the County should engage in a full analysis of the impacts of ordinance implementation.

Los Angeles County's energy policy needs to be rooted in reality, considering not only the goal, but all of the unintended consequences that come with it. This shutdown does not contemplate our current reality. Restricting local oil and gas production will not decrease our energy demands, it will only increase our dependence on costly foreign oil and drive energy prices even higher at a time when working families are struggling to make ends meet.

Imported oil is not subject to the strict air emission regulations that domestic production adheres to nor does this foreign oil employ local labor or pay taxes that benefit the County and citizens. Foreign production is unregulated, polluting, and a greater risk to our environment. The oil industry in California is the most regulated in the world. It represents clean, safe, reliable energy.

Unintended consequences, takings and condemnation without compensation, lost jobs and tax revenue; for these reasons and many others, the County must engage in a full and transparent effort to engage all stakeholders and undertake a rigorous analysis of the effects of this ordinance. We respectfully request that this Board of Supervisors hearing and vote be postponed until such an effort has been undertaken.

Thank you for the opportunity to comment on this issue, and please do not hesitate to contact me if you have questions. I can be reached anytime at ralphc@termoco.com or (562) 595-7401

Sincerely,



Ralph E. Combs
Manager of Regulatory, Community, and Government Affairs
The Termo Company

Cc:

LA County Board of Supervisors:
Supervisor Kathryn Barger
Supervisor Janice Hahn
Supervisor Sheila Kuhl
Supervisor Holly Mitchell
Supervisor Hilda Solis

LA County Department of Regional Planning
Valley Industry and Commerce Association
California Independent Petroleum Association

J. L. Vignes Ranch, Inc.
PO Box 90
Orinda, CA 94563
e-mail: W6NV@comcast.net

September 24, 2022

Los Angeles County Board of Supervisors
<https://publiccomment.bos.lacounty.gov>
C/O Clerk of the Board of Supervisors, Public Hearing Section
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012
<https://publiccomment.bos.lacounty.gov>

Subject: Comments to PROJECT NO. 2020-000246-(1-5) ADVANCE PLANNING CASE NO. RPPL2020000624-(1-5) OIL WELL ORDINANCE

The J. L. Vignes Ranch, Inc. and its family members, employees and shareholders are owners of properties and associated mineral rights located in the un-incorporated Santa Susana Mountains. For over one hundred years, the family properties have produced gas and oil and contributed to the development of Los Angeles. Geological studies conducted in the past indicate that deep reserves are highly likely to be present that could provide valuable hydrocarbons for another one hundred years.

J. L. Vignes Ranch, Inc. opposes LA County's "Oil Well Ordinance". The Ordinance is not in the long-term public benefit and interest. The proposed phase-out and elimination of proven oil resources will deplete local energy resources and impact the wider California economy.

1. L.A. County's oil wells yield wide-ranging economic benefits and pose no significant safety hazards. Oil and gas drilling and production practices in California are arguably the cleanest and most environmentally sound operations in the world.
2. The oil and energy industry is a major employer in LA County that will be negatively impacted. Oil field production and down-stream refineries, chemical factories, natural gas and related retail distribution chains will be driven out of business.
3. The oil wells and production facilities located on our properties have a useful life that greatly exceeds the proposed phase-out period. The Ordinance outlines an unlawful 'taking' of mineral rights.

Please delay action on the Draft Oil Well Ordinance until all economic and social impacts can be quantified. The draft ordinance requires detailed study to avoid massive unintended consequences and costs to community.

Sincerely,

O. Sweningsen

Oliver Sweningsen, Ranch Manager
J. L. Vignes Ranch, Inc.

September 26, 2022

Supervisor Holly Mitchell, Chair, 2nd District
Supervisor Hilda Solis, 1st District
Supervisor Sheila Kuehl, 3rd District
Supervisor Janice Hahn, 4th District
Supervisor Kathryn Barger, 5th District
Los Angeles County Board of Supervisors
500 West Temple St., Suite 383
Los Angeles, CA 90012

RE: Oil Well Ordinance, Plan No. RPPL2020000624 - **SUPPORT**

Dear Honorable Supervisors of Los Angeles County:

We are writing on behalf of over 130 environmental justice, environmental, health, community, labor and faith organizations to commend your historic commitment to prioritize the health, safety and well-being of Los Angeles County residents by instructing the Department of Regional Planning (“DRP”) to amend LA County’s Planning and Zoning Code (Title 22) to prohibit all new oil wells and production facilities and designate all existing oil wells and production facilities as nonconforming uses. Our organizations are deeply concerned about both the acute and chronic harms to the people and communities we represent from pollution caused by the extraction, processing, and burning of fossil fuels. We support DRP’s amendments to Title 22 and urge the Board to adopt the proposed Oil Well Ordinance. We recognize that the adoption of the Oil Well Ordinance is a necessary first step to ensure oil drilling is eventually phased out throughout *all* of unincorporated Los Angeles County and we look forward to continuously working with this Board and DRP to ensure that residents living around the Inglewood Oil Field share this same benefit.

The Board’s adoption of the proposed Oil Well Ordinance is essential to protect our communities and is consistent with the growing body of scientific literature that demonstrates the risks and dangers of allowing oil drilling near homes, schools, and other sensitive sites. In unincorporated Los Angeles County, there are nearly 2,000 active and idle oil and gas wells and the majority are located within 2,500 feet of homes, schools, and hospitals.¹ More than 580,000 Los Angeles

¹ “Urban Oil and Gas Production in Los Angeles County,” USC Environmental Health, August 6, 2019.
<https://envhealthcenters.usc.edu/2019/08/urban-oil-and-gas-production-in-lacounty.html>

County residents live within one-quarter mile of an actively producing oil and gas well.² Los Angeles County communities of color live disproportionately near oil and gas wells and suffer greater health harms: 44 percent of Black, 37 percent of Latinos, and 38 percent of Asian residents live near oil and gas wells, compared to 31 percent of White residents.³ By adopting the proposed Oil Well Ordinance, the Board is protecting its residents from harmful local pollution that unduly burdens workers, low-income communities, and communities of color.

Our coalition understands that adopting the proposed Oil Well Ordinance is the first of many steps the County must take to phase out oil drilling in Los Angeles County. We also understand that with more than half of the oil wells in unincorporated Los Angeles County concentrated in the Inglewood Oil Field, the County must quickly ensure that this Board's September 2021 motion to phase out oil drilling applies to the Inglewood Oil Field. As such, once the proposed ordinance takes effect, this Board should ensure that the Department of Regional Planning concurrently amends the Baldwin Hills Community Standards District, as DRP stated its intention to do in its September 27, 2022 letter to the Board. We urge DRP to amend the Baldwin Hills Community Standards District and individual specific plans to immediately prohibit new wells and to set a timeline to wind down existing production. Phasing out oil drilling throughout the County, including at the Inglewood Oil Field, is consistent with recommendations in LA County's own OurCounty sustainability plan, state and federal policies to reduce carbon emissions to maintain a livable planet, policies being pursued by a growing number of other local jurisdictions including the City of Los Angeles and Culver City, and recent legislative action in California that prevents new permits for oil drilling within 3,200 feet of a sensitive receptor.

We thank this Board for your commitment to make Los Angeles County a healthier place for all, particularly for residents most impacted by the harmful pollution and operational hazards associated with existing oil production. We urge you to adopt the proposed Oil Well Ordinance and look forward to our continued collaboration.

Respectfully,

Alan Weiner, Chapter Lead, 350 Conejo - San Fernando Valley

Alex Marquardt, Co-Founder and Staff Attorney, Climate Defense Project

Alison Hahm, Associate Attorney, Communities for a Better Environment

Allis Druffel, Southern California Director, California Interfaith Power & Light

Amanda Perez, Executive Director, Maravilla Historical Society

Amanda Tapia, Co-Founding Organizer, The People of South Gate

² O'Connor et al. "Filling the Void," Environmental Defense Fund, 2017

https://www.edf.org/sites/default/files/california-monitoring_filling-the-void.pdf

³ Srebotnjak, Tanja and Miriam Rotkin-Ellman, "Drilling in California: Who's at risk?," Natural Resources Defense Council, October 2014, p. 4. <https://www.nrdc.org/sites/default/files/california-fracking-risks-report.pdf>

Andrea Leon-Grossmann, Director of Climate Action, Azul
Andy Hattala, Co-Chair, The Climate Reality Project Los Angeles
Anna Cummins, Executive Director, The 5 Gyres Institute
Arnulfo de la Cruz, Executive Vice President, SEIU Local 2015
Bahram Fazeli, Director of Research and Policy, Communities for a Better Environment and Co-Chair of STAND-LA
Belen Bernal, Executive Director, Nature for All
Ben Lara, President, El Sereno Stallions
Ben Stapleton, Executive Director, United States Green Building Chapter - Los Angeles
Brigid Lawlor, Province Advocacy Liaison, Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Bruce Gagnon, Coordinator, Global Network Against Weapons & Nuclear Power in Space
Bruce Reznik, Executive Director, LA Waterkeeper
Caroline Henderson, Senior Campaigner, Greenpeace USA
Carolyn Chriss, Group Leader, East Valley Indivisibles
Chelsea Kirk, Research and Policy Analyst, Strategic Actions for a Just Economy
Cheryl Auger, President, Ban SUP
Dan Ress, Staff Attorney, Center on Race, Poverty & the Environment
Daniel Tamm, Chair, Interfaith Solidarity Network
Danny Hom, Strategy Officer, GRID Alternatives Greater Los Angeles
David Diaz, Executive Director, Active San Gabriel Valley
David Haake and Nicole Levin, Chair of Clean Break Committee and Campaign Representative, Beyond Dirty Fuels, Sierra Club
David Levitus, Executive Director, LA Forward
Dean Toji, Jan Victor Andasan, and **Celia V. Andrade**, Co-Chairs, A3PCON Environmental Justice Committee
Derek Steele, Interim Executive Director, Social Justice Learning Institute
Dianna Cogen, CEO and Co-Founder, Plastic Pollution Coalition
Dorinda Moreno, Founder and Principal, Fuerza Mundial Global
Doug Bender, Member of Steering Committee, Indivisible South Bay LA
Dr. Catherine Garoupa White, Executive Director, Central Valley Air Quality Coalition
Eddie Martinez, Executive Director, Latino Equality Alliance
Elva Yañez, Senior Advisor, Parks, Land Use and the Built Environment; Prevention Institute
Eric Romann, STAND-LA Coalition
Fatima Malik, President, League of Women Voters of Los Angeles County
Fredric Evenson, Director, Ecological Rights Foundation
George Leddy, PhD Director, Sustainable Environment Institute LA Community College District
Gladys Delgadillo, Climate Organizer, Center for Biological Diversity
Graham Hamilton, Manager, Surfrider Foundation Los Angeles Chapter

Haley Ehlers, Associate Executive Director, Climate First: Replacing Oil and Gas
Hugo Garcia, Chairperson, El Sereno Organizing Committee
Irena H Varjabedian, CSAN
Irene Kao, Executive Director, Courage California
Jackie Nuñez, Founder, Climate Health Now
James M. Limbaugh, President, West Los Angeles College
Jamie McConnell, Deputy Director, Women's Voices for the Earth
Janet Gollery McKeithen, Minister, The Church in Ocean Park
Janette Robinson-Flint, Executive Director, Black Women for Wellness
Jasmin Vargas, Southern California Organizer, Food & Water Watch
Jennifer Ferrigno, Co-Director, National Network for Immigrant & Refugee Rights
Jennifer Krill, Executive Director, Earthworks
Jennifer Tanner, Founder, Indivisible California Green Team
Jerry Rivers, Environmental Scientist, North American Climate, Conservation and Environment
Jesse N Marquez, Executive Director, Coalition For A Safe Environment
Jessica Craven, Member, Los Angeles County Democratic Party AD51, Feminists in Action
Los Angeles
Jesus Alonso, Kern Community Organizer, Clean Water Action
Joanie Steinhaus, Gulf Program Director, Turtle Island Restoration Network
John Davis, Executive Director, The Rewilding Institute
Jorge Garcia, President, El Sereno Historical Society
Jorge Gutierrez, Executive Director, Familia: Trans Queer Liberation Movement
Judith Enck, President, Beyond Plastics
Julie Levine, Co-Chair, MLK Coalition of Greater Los Angeles: Topanga Peace Alliance
Julie Meltzer, Founder and Senior Advisor, Clockshop
Junior Sanchez, Organizer, SELA Chisme, SELA Chisme
Karen Reside, Secretary, Long Beach Gray Panthers
Karina Maher, MD, Climate Health Now
Katherine Pease, Director of Science and Policy, Heal The Bay
Kathi Cervantez, Co-Director of Community Transformation, Promesa Boyle Heights
Kathy Seal, Group Leader, Citizens Climate Lobby, LA West Chapter
Katie Bolin, RN, Alliance of Nurses for Healthy Environments
Kaya Allan Sugerman, Illegal Toxic Threats Program Director, Center for Environmental Health
Kerry Kriger, Executive Director, Save the Frogs!
Kobi Naseck, Coalition Coordinator, VISIÓN
Laura Deehan, State Director, Environment California
Laura Hickernell, State Manager, Mothers out Front - California
Laura Raymond, Director, Alliance for Community Transit - Los Angeles
Laura Velkei, Communications Director, Arts District Community Council LA

Lawrence Couch, Director, National Advocacy Center of the Sisters of the Good Shepherd
Luis Morales, Director of Community Engagement, CDTech
M. Ahmanise Sanati, Co-Founder, Westside Activists
Maegan Ortiz, Executive Director, Instituto de Educacion Popular del Sur de California
Mala Wingard, Normal Heights Indivisible
Margaret Meyncke, SoCal Broadband Leader, Great Old Broads for Wilderness
Martha Camacho Rodriguez, Director, Social Ecological Education LA
Maro Kakoussian, Climate Justice Organizing Manager, Physicians for Social Responsibility - Los Angeles
Marty Perimutter, Co-Leader, Indivisible Media City Burbank
Mason Funk, Executive Director, The Outwords Archive
Matt Krogh, US Oil & Gas Campaign Director, Stand Earth
Melanie Winter, Founder and Director, The River Project
Michael Schneider, Founder, Streets for All
Michael Stocker, Director, Ocean Conservation Research
Micheal Doshi, Director of Partnerships, Algalita
Micheal J. Painter, Coordinator, Californias for Western Wilderness
Michele Prichard, Senior Director for Strategic Initiatives, Liberty Hill
Nancy Buermeyer, Senior Policy Strategist, Breast Cancer Prevention Partners
Nancy Halpern Ibrahim, Executive Director, Esperanza Community Housing Corporation, Los Angeles
Natalie A Backman, Co-Founder and Owner, Sakti Rising
Nathan Taft, Senior SAFE Cities Campaigner, Stand Earth
Neena Mohan, Climate Justice Program, California Environmental Justice Alliance
Nicole Ghio, Senior Fossil Fuels Program Manager, Friends of the Earth
Nina Zvaleko, Co-Organizer, Converging Storms Action Network
Norayma Cabot, CEO, A Place Called Home
Omar R Cardenas, Organizing Director - Long Beach, Californians for Justice
Omonigho Oiyemhonlan, Associate Attorney, Earthjustice
Paulina Torres, Staff Attorney, Natural Resources Defense Council
Rachel Smith, Partnerships Lead, Sunrise Movement Los Angeles
Reginald Johnson, Founder, Willowbrook Inclusion Network
Reverend Louis Chase, Holman United Methodist Church
Richard Parks, President, Redeemer Community Partnership
Ruth Breech, Senior Campaigner, Rainforest Action Network
Ruth Richardson, Rooted in Resistance (Indivisible- Pasadena)
Sandy Emerson, Board President, Fossil Free California
Sarah Stewart, President, Animals Are Sentient Beings Inc.
Seng So, Los Angeles Lead Organizer, Asian Pacific Environmental Network
Shannon Smith, Executive Director, FracTracker Alliance

Shelley Silbert, Executive Director, Great Old Broads for Wilderness
Sherry Lear, Organizer, 350 South Bay Los Angeles
Sheryl O Warren- Carey Harris, Owner, New Genesis Enterprises
Shoshana Wechsler, Coordinator, Sunflower Alliance
Simon Aron, Hub Coordinator, Sunrise Movement LA Youth
Sonya Vasquez, Chief Operations Officer, Community Health Councils
Sylvia Betancourt, Program Manager, Long Beach Alliance for Children with Asthma
Tammy Membreno, Executive Director, Barrio Action Youth & Family Center
Taylor Thomas, Co-Executive Director, East Yard Communities for Environmental Justice
Teresa Bui, State Climate Policy Director, Pacific Environment
Teresa Kotturan, Main NGO Representative, Sisters of Charity Federation
Tori Kjer, Executive Director, Los Angeles Neighborhood Land Trust
Veronica Padilla, Executive Director, Pacoima Beautiful
Violeta Urbina, President, Comite Navideno
Wes Reutimann, Special Programs Director, Active San Gabriel Valley
Yvette Arellano, Director, Fenceline Watch









Catherine Reheis-Boyd
President and CEO

September 26, 2022

Los Angeles County Board of Supervisors
Via comment website: <https://publiccomment.bos.lacounty.gov>

Re: Project No. 2020-000245-(1-5) Oil Well Ordinance

The Western States Petroleum Association (“WSPA”) appreciates this opportunity to provide comments on the proposed ordinance amending Title 22 – Planning and Zoning and Title 12 – Environmental Protection of the Los Angeles County Code (“Oil Well Ordinance”). WSPA is a trade association that represents energy companies that explore for, produce, refine, transport and market petroleum products, natural gas, and other energy supplies in California and four other western states, including oil and gas producers in the City and County of Los Angeles.

WSPA is strongly opposed to the proposed Oil Well Ordinance, which seeks to: (1) prohibit new oil wells and production facilities; (2) designate existing oil wells and production facilities as nonconforming uses subject to the County Code’s 20-year amortization period; (3) establish consistent regulations for existing oil wells and production facilities during the amortization period; and (4) remove the exception for oil wells from regulations for noise and vibration.

The Oil Well Ordinance will increase dependence on foreign oil.

WSPA believes it is fundamentally unwise to curtail production in the state while our President is forced to call for other oil-producing nations to increase their production to avoid a global and national energy crisis. California’s oil and gas resources are produced under some of the strictest environmental and public health regulations in the world, and many of California’s refineries were specifically designed to process California crudes in the most environmentally and economically efficient manner possible. Even aside from the energy crisis, banning production in Los Angeles increases both the state’s reliance on foreign oil not subject to such rigorous environmental standards and the amount of imported crude coming through our already crowded ports.

The Oil Well Ordinance will have devastating economic impacts.

Currently 152,000 men and women have careers in the oil and gas industry in California and 366,000 people have careers whose jobs depend on the industry. The industry in California contributes \$152 billion every year in economic activity and directly contributes \$21.6 billion in local, state, and federal tax revenue to support schools, roads, public safety, and other vital services.

The City of Los Angeles Petroleum Administrator’s 2019 report¹ to the Los Angeles City Council indicates that the oil industry contributes \$430 million annually in economic output, and more than \$270 million in gross

¹ City of Los Angeles, Department of Public Works, Office of Petroleum and Natural Gas Administration and Safety (OPNGAS), *Oil and Gas Health Report: A Report on Council File 17-0447 Land Use Codes / Oil and Gas Development / Impact on Resident Health and Safety / Code Change Proposals*. July 25, 2019, (p 121).

regional product. The 1,480 direct jobs in the industry collectively bring \$155 million in labor income. These 1,480 jobs mean 1,480 careers, many of which have been the result of years of education and investment in order to support families and communities in the Los Angeles region. The average salaries in the production sector exceed \$160,000 annually.

The Oil Well Ordinance amounts to a taking, for which those affected must be justly compensated.

The Oil Well Ordinance designates existing oil wells and production facilities as nonconforming uses subject to a 20-year amortization period under Sections 22.172.050.B and 22.172.050.B.1.f of the County Code. This nonconforming designation and planned phase out of existing facilities will almost certainly result in substantial financial liabilities to the City under the takings clause of the United States Constitution and comparable provisions of the California Constitution. These clauses require payment of just compensation when a government entity takes private property for a public use.

Under California law, a city may terminate nonconforming uses without compensation if the governing jurisdiction provides a reasonable amortization period “commensurate with the investment involved.”² In this case, it is clear that the County Code’s 20-year amortization period is neither reasonable nor commensurate with the investment required to develop, construct, and maintain existing wells and production facilities. Amortization periods can adequately compensate for movable property, such as billboards or liquor stores, as owners of those businesses may recoup the entire value of their investment *and* move any remaining inventory to a new location in an appropriate zone. But amortization utterly fails as a substitute for just compensation for vested oil and gas rights, where the extraction of minerals, including an expansion of that use, is recognized and protected under the diminishing asset doctrine.³ In fact, no case has held that amortization can be used when eliminating a diminishing asset use. Because the 20-year amortization period provided for in the County Code is not commensurate with the investment involved in oil production, the Oil Well Ordinance constitutes a taking.

WSPA hopes that the Board of Supervisors seriously considers the issues raised in this letter and the risks associated with approving the proposed Oil Well Ordinance.

Respectfully,



Catherine Reheis-Boyd
President and CEO

² *Metromedia, Inc. v. City of San Diego*, 26 Cal.3d 848, 882 (1980).

³ *Hansen Bros. Enters. V. Board of Supervisors*, 12 Cal.4th 533 (1996).



Glenn La Fevers
Director - Storage

Southern California Gas
Company
9400 Oakdale Ave
Chatsworth, CA 91313

Tel: (818) 701-3450
GLaFevers@socalgas.com

VIA E-MAIL

September 26, 2022

The Honorable Board of Supervisors
County of Los Angeles
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Re: Proposed Oil Well Ordinance – September 27, 2022, Agenda, Item 8 (Project No. 2020-000246-(1-5); Case No. RPPL2020000624)

Dear Chair Mitchell and Honorable Supervisors:

Southern California Gas Company (“SoCalGas”) respectfully submits these comments on the proposed Oil Well Ordinance (“OWO”) amendments. SoCalGas supports the County’s efforts and the Board of Supervisors’ vision to prioritize and protect the public health, safety, and welfare of residents living near oil wells. While we understand the focus of the OWO to be oil wells and oil production facilities, not regulated public utility assets and services, some of the definitions the proposed OWO uses are quite broad and run the potential risk of introducing confusion. SoCalGas therefore respectfully requests that the OWO be clarified with respect to its potential applicability to public utility assets.

As noted in our prior comments dated May 26, 2022, SoCalGas is a public utility regulated by the California Public Utilities Commission (“CPUC”), and operates four underground natural gas storage facilities in Southern California, including three (Aliso Canyon, Honor Rancho and Playa del Rey) located in part within unincorporated Los Angeles County. As defined in the Public Utilities Code, “public utility” includes gas corporations where the service is performed for, or the commodity is delivered to, the public or any portion thereof.^{1,2} Under California law, the CPUC has exclusive jurisdiction to grant certificates of public necessity authorizing gas corporations such as SoCalGas to design, construct, operate, and maintain underground natural gas storage facilities.³ Utility facilities are ratepayer-based assets under the jurisdiction of the CPUC. Under the California Constitution, “[a] city, county, or other public body may not

¹ California Public Utilities Code, § 216(a)(1).

² Moreover, the California Governor’s March 19, 2020 Executive Order (N-33-20) in response to the threat of COVID-19, designates SoCalGas as critical infrastructure, essential to continuity of functions critical to public health and safety as well as economic and national security, and underscores that safe and reliable delivery of natural gas to our customers is an essential service.

³ California Public Utilities Code §1002.

regulate matters over which the Legislature grants regulatory power to the [Public Utilities] Commission.”⁴ Thus, under the California Constitution, as to matters over which the CPUC has been granted regulatory power, the CPUC’s jurisdiction is exclusive. As such, SoCalGas requests that the proposed OWO be revised to clarify that it does not apply to regulated utility assets.

In addition to the regulatory impacts mentioned above, the interpretation of “well” in the current draft of the OWO potentially includes regulated utility assets that may actually impact underground gas storage operations and public utility services. We appreciate that the definition of “well” in the current draft OWO excludes wells used to inject or withdraw gas from an underground storage project. However, public utility storage field operations involve additional activity beyond injecting and withdrawing natural gas. Accordingly, SoCalGas asks and recommends that the definitions of “production facility” and “well” in the proposed OWO be further clarified to exclude all authorized regulated utility assets. We respectfully request incorporation of the edits shown in underline format in Attachment A hereto, which would clarify that “production facility” and “well” exclude any facility or well operated by a public utility for use in and support of the provision of public utility services.

Due to the unique aspects of SoCalGas’ facilities and regulated operations, we appreciate your consideration to provide that OWO requirements do not detrimentally impact critical, regulated, and permitted underground natural gas storage facilities and SoCalGas’ ability to serve Southern California customers in a reliable and safe manner.

SoCalGas appreciates the opportunity to comment on the draft ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn La Fevers". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Glenn La Fevers
Director – Storage
Southern California Gas Company

Attachment

⁴ California Constitution, Article XII, section 8.

ATTACHMENT A

Requested Changes to Draft Oil Well Ordinance (Exhibit A to Board of Supervisors dated September 26, 2022)

SECTION 2. Section 22.14.150 is hereby amended to read as follows:

...

Production facility. As defined in Section 3010 of the California Public Resources Code, but excluding ~~an underground gas storage project, as defined by Section 1726.1.(a)(6) of the California Code of Regulations; any facility operated by a public utility.~~

...

Well. As defined in Section 3008(a) of the California Public Resources Code, but excluding any well used ~~by to observe, inject, or withdraw gas from~~ an underground storage ~~project facility as part of its authorized regulated utility operations~~. This term includes any active well, idle well as defined in Section 3008(d) of the California Public Resources Code, and partially plugged and abandoned well.

September 26, 2022

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 381B
Los Angeles, CA 90012

RE: Oil Well Ordinance/Project No 2020-000246-(1-5)
Case No. RPPL2020000624

Honorable Board of Supervisors:

The purpose of this letter is to voice my very strong opposition to the proposed Oil Well Ordinance. To be clear, I am very concerned about our environment as well as the health and safety of our community. These are very important issues that need to be continuously evaluated, addressed and actions need to be taken.

I understand the concept of limiting and/or stopping future drilling and oil production when and if it poses an environmental or health issue. However, the unilateral termination of existing oil and gas production which is and has been in existence in Los Angeles County for decades goes beyond just an extreme measure for the following reasons:

- **A REAL NEED FOR OIL RIGHT NOW**
 - The reality is that your constituents need oil and gas. This may change overtime; however, the transition will take time. Local production of these resources is one of the least costly alternatives available today.
- **REGULATION- NOT TERMINATION**
 - Currently, there are laws and measures in place that serve to monitor and regulate existing oil and gas production. If these are insufficient to insure the safety and wellbeing of our community, it would follow that a logical approach would be to create additional rules and regulations- not a complete termination of all oil and gas production.
- **COUNTY INCOME LOSS**
 - Los Angeles County currently benefits from oil production on several levels including but not limited to jobs, taxes generated by the oil and gas (which will increase as the price of oil continues to increase driven by global dynamics); and ancillary services that support the industry. This ordinance will cause these revenue sources to stop completely.
- **COUNTY EXPENSE/LIABILITY**
 - If this Ordinance is approved as proposed, it is very possible that the action would be similar to Condemnation or Eminent Domain. It would follow that compensation will need to be paid by the County to the owners of the existing holdings.

- **PROPERTY CONDITION**

- Current oil and gas production locations are maintained by the operators per existing rules and regulations. If this Ordinance is adopted and the right to operate these production locations is terminated, it is possible that some of the properties will be abandoned: thus creating blighted conditions.

I urge you to review this further and either reject the proposed Ordinance or delay its consideration until more information and/or modifications can be made that are more appropriate given the ramifications.

Thank you for your consideration,

Scott R. Evans



End Oil Drilling in Los Angeles

Sept. 24, 2022

We, the 1,443 undersigned, call for an end to dangerous urban oil drilling in Los Angeles.

For decades, Los Angeles County's oil industry has been given free rein to drill for health-harming fossil fuels in the center of our communities. There are oil wells in our backyards, on school campuses, and next to our hospitals. Los Angeles residents living near oil wells are exposed to carcinogenic chemicals, asthma attack-inducing emissions, and the threat of catastrophic accidents or explosions.

While Los Angeles claims to be a leader on climate action, we continue to concentrate impacts in low-income communities and communities of color.

We are far past the time for L.A. to establish rules to protect public health from oil extraction. We must commit to real solutions that protect residents' health; create pathways for workers to transition into the work of decommissioning these sites and into dignified, family-supporting jobs; and end this extractive practice once and for all. It's time for bold action to transition away from fossil fuels in Los Angeles!

We urge you to phase out oil production across all of Los Angeles by declaring oil drilling a non-conforming land use and establishing a five-year phase-out period for ALL drilling.

Linda B, Pasadena, CA 91107
Jayrill Nutt, Diamond Bar, CA 91765
Jozefina Kaczmarek, La Crescenta, CA 91214
Allison Rensch, Beverly Hills, CA 90210
Margarita Perez, Sylmar, CA 91342
Emma Wilde, Los Angeles, CA 90068
Emily Clabough, Long Beach, CA 90808
Richard Partlow, Altadena, CA 91001
Kathy Schaeffer, Sherman Oaks, CA 91423
Joan Geduld, Los Angeles, CA 90035
Jamie Ates, Torrance, CA 90503
A.L. Hern, Los Angeles, CA 90049
Daniel Solis, Cypress, CA 90630
Wendy Pratt, Redondo Beach, CA 90277
E. Rodriguez, Los Angeles, CA 90067
Christa Neyber, West Hollywood, CA 90069
Cindy Bear, Los Angeles, CA 90048
Mark O'Brien, Manhattan Beach, CA 90266
Sarah Koskoff, Los Angeles, CA 90004
Dency Nelson, Hermosa Beach, CA 90254
Heath West, Los Angeles, CA 90036
Shahaneh Limonadi, Santa Monica, CA 90405
A Davis, Burbank, CA 91506
Pam Prichard, Burbank, CA 91505
John Barone, Santa Monica, CA 90401
Josefine Petersén, Hollywood, CA 90028
Fabienne Bouville, Pacific Palisades, CA 90272
Sheryl Lee, Santa Monica, CA 90405
Lori Kegler, San Pedro, CA 90731
Eric Peterson, Woodland Hills, CA 91367
Christine Borje, Los Angeles, CA 90039

Keith Wheldon, Sierra Madre, CA 91024
Kellen Dunn, Manhattan Beach, CA 90266
Patricia Berberich, Port Hueneme, CA 93041
Jerri Miller, Valley Village, CA 91607
Sharon Shingai, Woodland Hills, CA 91367
Toni Moore, Pasadena, CA 91104
Laurie S, Beverly Hills, CA 90211
Charles B., Tarzana, CA 91356
Alberto Acosta, Burbank, CA 91505
Sarah Wilkinson, Monrovia, CA 91016
Birgitta Martinez, Los Angeles, CA 90041
Veronica Goode, Porter Ranch, CA 91326
Sandy Williams, Covina, CA 91723
Kae Yates, Claremont, CA 91711
Alec Taratula, Alhambra, CA 91801
Elizabeth Carvalho, Little River, CA 95456
Natalie Aharonian, North Hollywood, CA 91605
Roger Ewing, Agoura Hills, CA 91301
Sandra Christopher, Burbank, CA 91505
Barbara Broz, Sherman Oaks, CA 91403
Sylvia Boris, Culver City, CA 90230
Jonathan Tachibana, Los Angeles, CA 90025
Artineh Havan, Burbank, CA 91501-2529
Lynne Weiske, Los Angeles, CA 90048-5106
Kenneth Stahl, Claremont, CA 91711
Nancy Smith, Malibu, CA 90265
Krister Olsson, Los Angeles, CA 90013
I-Ching Lao, Los Angeles, CA 90029
Georgia Tattu, Hermosa Beach, CA 90254
jesse croxton, Venice, CA 90291
Brian Rutkin, Culver City, CA 90230

dawn amano, Torrance, CA 90503
Valerie Wisot, Beverly Hills, CA 90212
Robert Johnson, El Segundo, CA 90245
Dudley And Candace Campbell, Valley Glen, CA 91401
Fiona Priskich, Beverly Hills, CA 90210
David Eder, Pasadena, CA 91105
Kylie Wright, Sylmar, CA 91342
Christina Williams, Los Angeles, CA 90027
REV. Talbert, Tujunga, CA 91042
Aaron Miller, Van Nuys, CA 91401
Michelle Quigley, Agoura Hills, CA 91301
Kathlyn Powell, Woodland Hills, CA 91364
Shana G, San Dimas, CA 91773
Shelley Finance, North Hollywood, CA 91601
Jacqueline Waddill, Pasadena, CA 91107
Lance Smith, Long Beach, CA 90803
Karen Joyce, Santa Monica, CA 90403
Annie Kam, Covina, CA 91722
Dalia Salgado, Los Angeles, CA 90017
Joshua Heath, Los Angeles, CA 90035
Terrence Butler, Van Nuys, CA 91405
henriette Brouwers, Los Angeles, CA 90026
casey danson, Venice, CA 90291
Geoffrey M. Stradling, Encino, CA 91316
Katie Flynn, Lake Hughes, CA 93532
Stephen Lee, Llano, CA 93544
Patricia Lewis, Los Angeles, CA 90064
Suellen Mayfield, Venice, CA 90291
Katherine Hsu, Cerritos, CA 90703
Florence Mesker, Los Angeles, CA 90035
Al Cullen, Pasadena, CA 91107
Melissa Haddad, Los Angeles, CA 90064
nancy ross, Van Nuys, CA 91406
Eric Politzer, Los Angeles, CA 90046
Nancy Rea, Los Angeles, CA 90035
Meriile Robertson, Pasadena, CA 91107
Tara Strand, North Hollywood, CA 91601
Chrilsta Neuber, West Hollywood, CA 90069
Jonci Aguillard, Los Angeles, CA 90045
Jane McCullough, Pasadena, CA 91105
Molly Joseph, Glendale, CA 91207
Laurie Hernandez, Avalon, CA 90704
Farrah Zeigler, Whittier, CA 90601
Hristina Jankovic, Beverly Hills, CA 90210
Wesley Chuang, Los Angeles, CA 90024
Marianne Kai, Sherman Oaks, CA 91403
Jordan Neiman, Los Angeles, CA 90068
Frederica Perera, Woodland Hills, CA 91364
Janice Hynek, Los Angeles, CA 90027
Caleb Ellis, Los Angeles, CA 90046
Patricia Moguel, Los Angeles, CA 90066
Patricia McPherson, Los Angeles, CA 90066
amanda foulger, Topanga, CA 90290
Merris Weber, Los Angeles, CA 90006
Stacey Learning, Encino, CA 91316

John Fowler, Santa Monica, CA 90405
Kare M., Beverly Hills, CA 90213
Susan Brisby, Lancaster, CA 93536
Patrick Bonner, South Gate, CA 90280
Robert Meier, Los Angeles, CA 90042
Yvonne Yvette, North Hollywood, CA 91607
A Downhower, Sierra Madre, CA 91025
Steve White, Carmel By The Sea, CA 93921
Renee Klein, Marina Del Rey, CA 90292
Edward Simpson, South Pasadena, CA 91030
Shan Albert, Studio City, CA 91604
Alexandria Luostari, Los Angeles, CA 90064
James William Gibson, Los Angeles, CA 90034
Diana Kliche, Long Beach, CA 90804
Leigh Clark, Granada Hills, CA 91344
MARTHA BURTON, Los Angeles, CA 90049
Marc Melinkoff, Woodland Hills, CA 91364
Mark Stannard, Los Angeles, CA 90056
Paulette Heath, Los Angeles, CA 90041
Anna MacKenzie, Santa Monica, CA 90405
Robert Chirpin, Northridge, CA 91324
Lenore Dowling, Los Angeles, CA 90039
Paul Martin, Pasadena, CA 91104
Eva Dayan, Los Angeles, CA 90036
Ted Myers, Santa Monica, CA 90403
Michael Kast, Panorama City, CA 91402
Susan Ryan, Los Angeles, CA 90019
bruce hirayama, Los Angeles, CA 90034
Jamie Rosenblood, Los Angeles, CA 90049
Steve Lustgarden, Santa Cruz, CA 95062
Kristina Wunder, Topanga, CA 90290
Katherine Prince, Los Angeles, CA 90046
Carol Ng, Los Angeles, CA 90026
Steven Hall, Pasadena, CA 91104
Vivian Parker, Burbank, CA 91506
Hannes Jaenicke, Pacific Palisades, CA 90272
Diane London, Woodland Hills, CA 91365
Diego Martinez, Los Angeles, CA 90015
Monica Kim, Long Beach, CA 90807
alex haythorn, Inglewood, CA 90302
Santa Susana Mtn. Park Association, Chatsworth, CA 91311
Tom Campbell, Hermosa Beach, CA 90254
Gaia Terza Tessel, Ojai, CA 93023
Shane Coburn, Los Angeles, CA 90066
Doris Wolz-Cohen, Santa Monica, CA 90404
Jennifer Caron, Burbank, CA 91501
Alissa Baier-Lentz, Santa Monica, CA 90402
Debra Y, Palmdale, CA 93551
Denise Dardarian, Los Angeles, CA 90046
Calvin Christopher, Los Angeles, CA 90045
Maria M Angelini, Los Angeles, CA 90027
Mark Mosley, Northridge, CA 91324
alice nguyen, San Jose, CA 95136
Shabnam Bahmanyar, Los Angeles, CA 90025
Kenny Allen, Long Beach, CA 90802

Nora Nunez, Yucca Valley, CA 92284
Jennifer Roth, Los Angeles, CA 90066
Suzanne and Henry Borenstein, Los Angeles, CA 90066
Geoff Armstrong, Sylmar, CA 91342
Daniel G, Sherman Oaks, CA 91411
Gabe Abraham, Venice, CA 90291
jess zelniker, North Hollywood, CA 91601
Kristin Baker, Pasadena, CA 91104
Kathryn Gibbons, Toluca Lake, CA 91610
Brett Holland, Los Angeles, CA 90026
Marty Bostic, Los Angeles, CA 90025
Agnes Dickson, Irvine, CA 92612
Beverly Harris, Beverly Hills, CA 90212
Karen Emanuel, Tarzana, CA 91356
Mike Jones, West Hills, CA 91307
Steven Morris, Redondo Beach, CA 90278
Elizabeth Edinger, North Hollywood, CA 91601
Brianda Puig, Los Angeles, CA 90071
Julie Adelson, San Pedro, CA 90731
Jean Woodrow, San Pedro, CA 90732
Flynn Coleman, Los Angeles, CA 90025
Laurie Rittenberg, Studio City, CA 91604
Jed Fuhrman, Topanga, CA 90290
alena Jorgensen, Temple City, CA 91780
Marion Schulman, Los Angeles, CA 90034
Terry Sakata, Long Beach, CA 90803
Susan Champagne, Burbank, CA 91505
Madeleine Fisher Kern, Los Angeles, CA 90036
Valerie Romero, Los Angeles, CA 90038
Anita Emery, Los Angeles, CA 90016
Frederick Cliver, Long Beach, CA 90815
Rebecca Hoeschler, El Segundo, CA 90245
Elise Adibi, Los Angeles, CA 90042
Linda Webb, Rancho Palos Verdes, CA 90275
Margaret Adachi, Glendale, CA 91205
Raven Pfister, Long Beach, CA 90813
Mark Glasser, Los Angeles, CA 90066
Amy Sullivan, Los Angeles, CA 90066
Simone Boudriot, Tujunga, CA 91042
Amelia Jones, Santa Monica, CA 90405
Gerald Paone, Chatsworth, CA 91311
Sara Katz, Manhattan Beach, CA 90266
Austin Fite, Santa Monica, CA 90401
Debra Noble, Altadena, CA 91001
Jacklyn Loughbom, Manhattan Beach, CA 90266
Emily Richards, Los Angeles, CA 90049
cathy crum, Agoura, CA 91301
Jim Talbot, Granada Hills, CA 91344
Rev. Maria Riter Wilson, San Dimas, CA 91773
Jan Leath, Glendale, CA 91205
Ross Heckmann, Arcadia, CA 91006
georgia goldfarb, Malibu, CA 90265
Abigail Bline, Los Angeles, CA 90034
Kenneth Lapointe, Los Angeles, CA 90031

Roshanne Aghevli, La Crescenta, CA 91214
Kathy Popoff, San Pedro, CA 90732
Peter Stearns, Long Beach, CA 90807
Linc Conard, Altadena, CA 91001
shohreh Forouzan, Los Angeles, CA 90024
Cindy Koch, Long Beach, CA 90807
Maryam Faresh, Sherman Oaks, CA 91423
Francine Kubrin, Los Angeles, CA 90049
Julie May, Los Angeles, CA 90034
schani nuripour, Los Angeles, CA 90027
Robin Down, Sylmar, CA 91342
Rod Repp, Baldwin Park, CA 91706
Heather White, Rancho Palos Verdes, CA 90275
Milton Randle, Inglewood, CA 90305
Michelle Geil, Marina Del Rey, CA 90292
Lisa Gee, La Crescenta, CA 91224
Virginia Turner, Woodland Hills, CA 91367
Leah Fox, Redondo Beach, CA 90277
Gary Green, Pasadena, CA 91107
Jeffrey Greif, Venice, CA 90291
Laura Silagi, Venice, CA 90291
Mario Milch, Los Angeles, CA 90027
Donna L. Harris, Signal Hill, CA 90755
Katharine Warner, Sunland, CA 91040
Suzanne Marcella Camarillo, Los Angeles, CA 90069
Lily Munoz, Alhambra, CA 91801
Kathy Knight, Santa Monica, CA 90405
Jodi Rosenbloom, Studio City, CA 91602
Allison Moffett, Pasadena, CA 91105
Lisbeth Jaasko, Whittier, CA 90604
Tom Sanchez, Los Angeles, CA 90031
Kaya Foster, Santa Monica, CA 90402
Regina Leeds, Los Angeles, CA 90048
Mariela T Huerta, Los Angeles, CA 90026
Miranda Ramirez, Canyon Country, CA 91351
Dan Larson, Topanga, CA 90290
Lorraine Gardner, Bakersfield, CA 93311
Katie Spahn, Lakewood, CA 90712
Morgan Stevens, Valley Village, CA 91607
Marc Paez, Culver City, CA 90230
Steven Hoelke, Claremont, CA 91711
Sarah Sismondo, Duarte, CA 91010
Tara McKenney, Santa Monica, CA 90404
Carol A Newton, Los Angeles, CA 90027
Jackie Keller, Beverly Hills, CA 90210
Theodore Bergmann, Los Angeles, CA 90064
frank goldstein, Rancho Palos Verdes, CA 90275
Benjamin Castro, Whittier, CA 90603
Christine Tobey, Los Angeles, CA 90036
Mia Strauss, Los Angeles, CA 90025
trina park, Valley Village, CA 91607
Priscilla Klemic, Sherman Oaks, CA 91401

Kimberly Di Bonaventura, Los Angeles, CA 90049
Nancy Mattoon, Los Angeles, CA 90069
MARK V SHELDON, Van Nuys, CA 91401
Brianna Mejia, San Fernando, CA 91340
Melanie Winter, Studio City, CA 91604
Nancy Matson, Los Angeles, CA 90066
Christopher Neal, Marina Del Rey, CA 90292
Laura Shamas, Pacific Palisades, CA 90272
Daniel Walter, Los Angeles, CA 90042
Riyaana Hartley, Los Angeles, CA 90066
Blue McRight, Venice, CA 90291
barbara poland, La Crescenta, CA 91214
kat burgess, Santa Monica, CA 90404
judith davies, Santa Monica, CA 90405
Joan Wickham, Pasadena, CA 91107
Denise LaChance, Winnetka, CA 91306
Sara Ross, Los Angeles, CA 90032
Jessica Wodinsky, Los Angeles, CA 90066
Angel Orona, Alhambra, CA 91803
Janet Miller, Sherman Oaks, CA 91423
Sara Hayes, Long Beach, CA 90814
Geoffrey and Linda Symcox, Pasadena, CA 91105
TIA TRIPLETT, Los Angeles, CA 90066
Laura Dutton, Los Angeles, CA 90004
Suzan Woodruff, Los Angeles, CA 90066
tevet tee, Los Angeles, CA 90065
Christina Nillo, West Hollywood, CA 90069
David Rosenstein, Santa Monica, CA 90402
Elizabeth Grainger, Claremont, CA 91711
Stefanie Rubin, Agoura Hills, CA 91301
Kathi Ellsworth, San Dimas, CA 91773
Thomas Tataranowicz, Malibu, CA 90265
Donna Lewis, Van Nuys, CA 91401
Rebecca Harper, Los Angeles, CA 90049
Shelley Sterrett, Santa Monica, CA 90402
Brenda Lee, Lakewood, CA 90712
Ken Windrum, Los Angeles, CA 90004
Nancy Goldberg, Los Angeles, CA 90066
Thane Christopher, Burbank, CA 91522
Arlene Zimmer, Rancho Palos Verdes, CA 90275
Scottie Hillaeio, Beverly Hills, CA 90210
Patrice Dobrowitsky, Pacific Palisades, CA 90272
Amy Wolfberg, Los Angeles, CA 90046
William Schoene, Santa Monica, CA 90405
Benjamin Park, West Hollywood, CA 90046
Gary Kuehn, Newhall, CA 91321
leslie klein, Los Angeles, CA 90027
Chaz Venzor, Covina, CA 91722
Diane Smith, Sherman Oaks, CA 91423
Norelyn Escobar, San Diego, CA 92126
Bret Polish, Tarzana, CA 91335
Karen O'Rourke, Canoga Park, CA 91304

Sherrie Kiing, Torrance, CA 90501
SUSAN ROSEN, Van Nuys, CA 91401
Pamela Clay, Los Angeles, CA 90068
Nicolette Weinstein, Downey, CA 90241
Daniel Costa, Los Angeles, CA 90068
El L, Oak Park, CA 91377
Natalie Gentile, Glendale, CA 91204
Judith McClure, Canyon Country, CA 91387
P. P. Soucek, Sherman Oaks, CA 91401
Caesar Pascual, Norwalk, CA 90650
Lynn Rysn, Torrance, CA 90505
Analise McNeill, Burbank, CA 91505
Tonya Cornelisse, Los Angeles, CA 90028
Mariana Micheli, Pasadena, CA 91106
Jonathan Kaufelt, Santa Monica, CA 90402
Holly Nurgin, Van Nuys, CA 91405
Aimee Newton, Los Angeles, CA 90005
Annette Lopez, Los Angeles, CA 90012
MARIE BOTEILHO, Los Angeles, CA 90046
Bess Childs, Los Angeles, CA 90064
Alexis Kusnier, Reseda, CA 91335
Mox Ruge, Sherman Oaks, CA 91403
Richard Watson, Long Beach, CA 90807
Sally White, Valencia, CA 91355
Jeff Dorer, Los Angeles, CA 90057
Joan Murray, Los Angeles, CA 90066
Steve Graff, Los Angeles, CA 90025
Jessica Craven, Los Angeles, CA 90065
Nina Wong, San Gabriel, CA 91776
roy rosenblatt, Sherman Oaks, CA 91403
Debbie Bolsky, Santa Monica, CA 90403
Lorna Paisley, Lake Balboa, CA 91406
Johanna Scott, Reseda, CA 91335
Lois Harris, Claremont, CA 91711
Sam Butler, Los Angeles, CA 90045
Frank Anderson, San Pedro, CA 90731
Kiran Annavarapu, Westlake Village, CA 91359
Deborah Collodel, Malibu, CA 90265
Gloria Schneider, Los Angeles, CA 90065
Diane Berliner, Los Angeles, CA 90046
Laurel Tucker, Claremont, CA 91711
Paulette Doulatshahi, Playa Del Rey, CA 90293
Julia Sanford, Van Nuys, CA 91406
Mary Quimby, Arcadia, CA 91006
Felicia Bander, Sebastopol, CA 95472
Michael Cavanaugh, Redondo Beach, CA 90278
Julie Slater-Giglioli, Los Angeles, CA 90046
Erlinda Cortez, Long Beach, CA 90807
Greg PERKINS, Long Beach, CA 90814
Shakayla Thomas, Compton, CA 90220
Melissa Miller, West Covina, CA 91790
Lauren Gardiner, Los Angeles, CA 90026
Danielle Charney, Santa Monica, CA 90405
sharon byers, Downey, CA 90242
Jessica Jean Posner, Palmdale, CA 93551
David Luboff, Burbank, CA 91501

Angela Carter, San Pedro, CA 90731
Virginia Watson, Los Angeles, CA 90026
Devin Brooke, Sherman Oaks, CA 91401
Anita Wisch, Valencia, CA 91355
Alice Darby, Los Angeles, CA 90048
Chris Van hook, Pacific Palisades, CA 90272
Jaime Nahman, Topanga, CA 90290
Eden Kennan, Van Nuys, CA 91405
Steve Rosin, Pasadena, CA 91101
Dan Roberto, Pasadena, CA 91104
Cynthia Vinney, Torrance, CA 90501
Grace Morsberger, Claremont, CA 91711
Dorian Goldstein, Los Angeles, CA 90035
Mark Yackley, Los Angeles, CA 90027
Erika Agnew, Los Angeles, CA 90028
Jim Nasella, Glendale, CA 91201
Jesus Manuel Huerta, Canyon Country, CA 91387
Maya Castillo, Hacienda Heights, CA 91745
Sandy Gross, Lynwood, CA 90262
Li Fan Gad, Los Angeles, CA 90068
Joy Fox, North Hollywood, CA 91607
John Edman, Glendale, CA 92264
Debra nichols, Palmdale, CA 93551
Jasmine Congdon-Ng, Hermosa Beach, CA 90254
gilmor shkedi, Valley Village, CA 91607
Jean Williamson, Studio City, CA 91604
Carina Chadwick, Los Angeles, CA 90019
Karen Hellwig, Los Angeles, CA 90056
Steven Weinstein-Foner, Los Angeles, CA 90042
Susan C. Acosta, Inglewood, CA 90303
Joshua Stamberg, Los Angeles, CA 90039
Mario E Martinez, Torrance, CA 90504
Susan Davis Mantee, Calabasas, CA 91302
Shana Garcia, San Dimas, CA 91767
Carroll Abshier, Lakewood, CA 90713
Lynda Cook, Canyon Country, CA 91351
Sherry Grant, Pacific Palisades, CA 90272
Diana Jones, Hacienda Heights, CA 91745
Ellen Schaffer, Sherman Oaks, CA 91403
Jennie Cohen, Pasadena, CA 91104
James McKelvey, Santa Clarita, CA 91350
Deimile Mockus, Los Angeles, CA 90004
Robert Pinkus, Studio City, CA 91604
Robert Nix, Mission Hills, CA 91345
jean robson, Hacienda Heights, CA 91745
Laura Juarez, Los Angeles, CA 90046
Gerald Kelly, Santa Monica, CA 90403
Nancy Steiner, Los Angeles, CA 90039
Larry Smith, Signal Hill, CA 90755
Phoebe Rufener, Torrance, CA 90503
cheryl auger, Pasadena, CA 91105
Elisabeth Rueb, Glendale, CA 91207
Ivan Huber, Los Angeles, CA 90045

Alison Gann, Topanga, CA 90290
Patricia Kolchins, Calabasas, CA 91302
Denise Vanzago, Burbank, CA 91506
Carolyn Davis, Westlake Village, CA 91361
Paula Pruner, North Hollywood, CA 91605
Howard H. Holmes, Los Angeles, CA 90069
Brett Parmenter, North Hollywood, CA 91601
Gabriella Sidhu, Los Angeles, CA 90046
Jim Haley, Castaic, CA 91384
Kathleen Cafiero, Manhattan Beach, CA 90266
Rajni Oberoi, Altadena, CA 91001
Pamela White, Los Angeles, CA 90035
Kimberlee Tellez, Los Angeles, CA 90019
Susan Ray, West Hollywood, CA 90046
Gerald Orcholski, Pasadena, CA 91104
Heather Schraeder, Culver City, CA 90230
Melissa Atkinson, Los Angeles, CA 90064
Glenn Stewart, La Verne, CA 91750
David Saperia, Santa Monica, CA 90403
Roshanee Lappe, Rolling Hills Estates, CA 90274
Michael Floeck, Los Angeles, CA 90048
Frances Alet, Calabasas, CA 91302
Jui Ishida, Long Beach, CA 90806
LEE JENKINSON, Canyon Country, CA 91351
Ron Hansel, West Covina, CA 91790
Bradley Colden, Whittier, CA 90602
Laura Schuman, Sherman Oaks, CA 91403
Marisa Landsberg, Manhattan Beach, CA 90266
Kacie Shelton, Pasadena, CA 91101
Ryan Schrader, Bellflower, CA 90706
pippa scott, Santa Monica, CA 90402
Indee Brooke, Sunland, CA 91040
Candace Rocha, Los Angeles, CA 90032
Malcolm Groome, Topanga, CA 90290
Gerald Shaia, Sun Valley, CA 91352
Jason Park, Arcadia, CA 91006
Michelle Kory, Valencia, CA 91354
Darcie Odom, Los Angeles, CA 90006
Ellen Haden, Pacific Palisades, CA 90272
Jacqueline Cochrane, Redondo Beach, CA 90278
Kamakshi Hart, Topanga, CA 90290
Ariane Gogny, Sherman Oaks, CA 91403
Susan Brauer, Glendale, CA 91202
Myron Meisel, Los Angeles, CA 90064
Philip Lefcourt, Pasadena, CA 91101
Robin Lande, Los Angeles, CA 90036
Sondra Morales, Los Angeles, CA 90023
Robert Davenport, Lakewood, CA 90712
Melinda Taylor, Long Beach, CA 90814
Pilar Zorrilla, West Hills, CA 91307
Rebecca Wang, Alhambra, CA 91801
Maaya Ota, Los Angeles, CA 90046
Lindsay Meagher, Redondo Beach, CA 90277
Victoria Yust, Venice, CA 90291

Robert L Oman, Sylmar, CA 91342
Zach Joseph, San Francisco, CA 94129
Jessica Rath, Los Angeles, CA 90027
Claudia Stegall, Glendale, CA 91205
Cathy Ashley, Santa Monica, CA 90404
Simone Schmidt, Rolling Hills Estates, CA 90274
Arnaud Dunoyer, Venice, CA 90291
April Kelley, Los Angeles, CA 90066
c preston, Valley Village, CA 91607
Karen Sewbwrq, Topanga, CA 90290
Margaret Starbuck, Pasadena, CA 91106
singgih tan, San Jose, CA 95123
Grace Urich, Hermosa Beach, CA 90254
Mario Magpale, Palmdale, CA 93550
Lois Feuer, Manhattan Beach, CA 90266
sophia lynne, Santa Monica, CA 90405
Tiffany Andrade, Duarte, CA 91010
Heidi Miller, North Hills, CA 91343
Gina Gosparini, Pasadena, CA 91106
Lauren OConnell, Santa Monica, CA 90403
Zach Driscoll, Los Angeles, CA 90019
Sarah Wyatt, Los Angeles, CA 90068
William Horrell, Northridge, CA 91325
Abby Wanamaker, Pasadena, CA 91104
Azie Amini, Los Angeles, CA 90024
Katherine Hale, La Canada, CA 91011
Isabel Freeman, Topanga, CA 90290
Lollie Ragana, Santa Monica, CA 90405
Stephanie Nunez, Van Nuys, CA 91405
Richard Wightman, Arcadia, CA 91006
Melinda Cotton, Long Beach, CA 90803
FRANK Burke, Los Angeles, CA 90045
Lisa Rembold, Canoga Park, CA 91303
Annemarie Girard, Pasadena, CA 91104
donye sacco, Los Angeles, CA 90001
Maureen O'Connell, Valley Village, CA 91607
Liz Amsden, Los Angeles, CA 90042
Rina Rubenstein, Los Angeles, CA 90018
mike Langston, Sherwood Forest, CA 91325
Elizabeth Chang, Chino Hills, CA 91709
Curtis Barnett, Long Beach, CA 90804
Anne DeVenzio, West Hollywood, CA 90046
Jennifer Elizabeth, North Hollywood, CA 91606
Nurit Wilde, Studio City, CA 91604
Stephanie Aston, North Hills, CA 91343
Mujon Baghai, Santa Monica, CA 90402
Lonnie Gordon, Malibu, CA 90265
Penelope Starr-Karlin, Los Angeles, CA 90066
Yolanda Danon, Manhattan Beach, CA 90266
Linda Larsen, Inglewood, CA 90304
Sara Gernsbacher, Los Angeles, CA 90042
Joe Feinblatt, Pasadena, CA 91104
Rosa Lopez, Panorama City, CA 91402
Jean Koch, Los Angeles, CA 90027
Kelly Henderson, Los Angeles, CA 90064

Katrina Christopher, Rancho Palos Verdes, CA 90275
Jessica Paolini, Berkeley, CA 94708
BRENDA RODRIGUEZ, Mission Hills, CA 91345
Carla Holguin, Los Angeles, CA 90027
Ryan Davis, Burbank, CA 91502
Henry Morgen, Los Angeles, CA 90019
Mehry Sepanlou, Beverly Hills, CA 90210
ELIZABETH Kibbey, Long Beach, CA 90803
Cheryl Khalid, North Hills, CA 91343
Deborah Y Chew, Lomita, CA 90717
Seth Laursen, Los Angeles, CA 90016
Crystal Taylor, Toluca Lake, CA 91602
Douglas Bender, Redondo Beach, CA 90277
Myrian Monnet, Pasadena, CA 91101-3289
Ruth Olafsdottir, Santa Monica, CA 90403
Julia Berkowitz, Los Angeles, CA 90025
Maggie Wineburgh-Freed, Los Angeles, CA 90041
Kathleen Jacecko, Redondo Beach, CA 90278
Karen E Smith, Studio City, CA 91604
Rhys Marsh, Los Angeles, CA 90077
Cristina Smith, Los Angeles, CA 90019
Ruben Cuevas, Altadena, CA 91001
Carlos Echevarria, Inglewood, CA 90302
Nancy Dubuc, Pasadena, CA 91104
Dirk Beving, Los Angeles, CA 90066
Stephen Markel, Los Angeles, CA 90066
joseph dadgari, Los Angeles, CA 90049
Stevie Sugarman, Malibu, CA 90265
Noah Youngelson, Los Angeles, CA 90066
Kathy Bilicke, Los Angeles, CA 90069
Michael Tullius, Encino, CA 91316
Michelle Lind, Hawthorne, CA 90250
Steve Vicuna, Monterey Park, CA 91754
Georgia Brewer, Sherman Oaks, CA 91401
William Heuser, Arcadia, CA 91007
Robert Espinoza, Northridge, CA 91330
George Budd, Los Angeles, CA 90056
David Manning, South Pasadena, CA 91031
Ellen Dinerman Little, Studio City, CA 91604
Jeanne Kuntz, Los Angeles, CA 90066
Jenna Bell, La Verne, CA 91750
Kara Masters, Topanga, CA 90290
Jeanne Schuster, West Covina, CA 91791
barbara Murray, Los Angeles, CA 90041
Faye Rye, Torrance, CA 90505
Don Sparks, Northridge, CA 91325
J Yudell, Santa Monica, CA 90409
Sherry Vatter, Los Angeles, CA 90034
Cecly Corbett, Tarzana, CA 91356
Alexander Fierro-Clarke, Los Angeles, CA 90026
Susan Porter, Pasadena, CA 91103
Daniel Wilkinson, Long Beach, CA 90808
J. Forman, Van Nuys, CA 91411

Rebecca Clark, West Hills, CA 91307
Norah McIntire, Los Angeles, CA 90046
Erfin Hartojo, Walnut, CA 91789
Laura Brody, Monrovia, CA 91016
Lena Hittelman, Los Angeles, CA 90026
Leah Snaith, Santa Monica, CA 90405
Robyn Link, Culver City, CA 90230
Melony Paulson, Diamond Bar, CA 91765
Aida Marina, South Pasadena, CA 91030
Kiersten Cluster, Los Angeles, CA 90025
Larissa Shen, Glendora, CA 91740
Rachael Jett, Torrance, CA 90501
Willy Lanuza, Montebello, CA 90640
Rebecca Prewitt, North Hollywood, CA 91602
Marigrace Gleason, Sherman Oaks, CA 91423
Varenka Lorenzi, Long Beach, CA 90814
Michael Leek, West Hollywood, CA 90069
Eli Peer, Los Angeles, CA 90026
Mo McGee, Pacific Palisades, CA 90272
Garrine Petersen, Sun Valley, CA 91352
Jeanna Lax, Los Angeles, CA 90028
Timothy Goodman, Cerritos, CA 90703
D. Taylor, Malibu, CA 90265
Jolene Burk, Los Angeles, CA 90024
INGRID STEINBERG, Pacific Palisades, CA 90272
Karen Gerst, Burbank, CA 91505
James Cohen, Santa Monica, CA 90402
Bonnie Cates, Playa Del Rey, CA 90293
Lathie Fierro, Van Nuys, CA 91406
Katie Shaw, Manhattan Beach, CA 90266
Greg Weiss, Tujunga, CA 91042
David Gaines, Studio City, CA 91604
Laurence Malt, Beverly Hills, CA 90210
William Briggs, Hermosa Beach, CA 90254
Tyson Martin, Burbank, CA 91505
Patricia Lauer, Signal Hill, CA 90755
Glori Griffith, Chatsworth, CA 91311
Cathy Cousins, North Hollywood, CA 91606
Rachel Rodriguez, Pasadena, CA 91106
Natalie Haddad, Los Angeles, CA 90077
Jean Merritt, North Hollywood, CA 91601
Donnal Poppe, Sherwood Forest, CA 91325
Hinda Joy Laury, Claremont, CA 91711
Iris Edinger, Woodland Hills, CA 91367
Alice Neuhauser, Manhattan Beach, CA 90266
Linda Doebel, Marina Del Rey, CA 90292
Nina Berry, Van Nuys, CA 91405
Judith Antin, Los Angeles, CA 90077
darynne jessler, Valley Village, CA 91607
Elena Albanese, Santa Clarita, CA 91387
DAVID SOTO, Santa Clarita, CA 91390
Diana Crane, Gardena, CA 90248
Constance Franklin, Los Angeles, CA 90026
Lesley Meyer, Los Angeles, CA 90042
Laura Herndon, Burbank, CA 91505

Linda Ninomiya, Los Angeles, CA 90034
Verla Walker, West Covina, CA 91791
Charles Wolfe, Sylmar, CA 91342-1401
Karen McCaw, Los Angeles, CA 90043
Anna Schofield, Los Angeles, CA 90024
Polly O'Malley, Los Angeles, CA 90025
Achilles Aiken, Whittier, CA 90601
MARY ROJESKI, Santa Monica, CA 90405
Genevieve Gates, Culver City, CA 90232
Neal Steiner, Los Angeles, CA 90034
Cecilia Gonzalez, Bellflower, CA 90706
Margaret Shekell, Los Angeles, CA 90034
Katherine Aker, Tujunga, CA 91042
Jennifer Bradley, Santa Monica, CA 90404
Vic Bostock, Altadena, CA 91001
Damon Brown, Los Angeles, CA 90016
Maggie McEldowney, Los Angeles, CA 90042
Renée Levine-Blonder, Woodland Hills, CA 91364
Jacqueline Pineda, Pasadena, CA 91107
Vance Arquilla, Santa Monica, CA 90405
Diana Davidson, Los Angeles, CA 90064
Mark Oki, Culver City, CA 90230
Leon Popa, Los Angeles, CA 90019
Tony Grutman, Los Angeles, CA 90036
Riley Haythorn, Inglewood, CA 90302
Jamaka Petzak, Glendale, CA 91202
Desi Larkin, Altadena, CA 91001
SUSUN GODWIN, Long Beach, CA 90814
valena dissmukes, View Park, CA 90008
Kikei Wong, Torrance, CA 90502
Ashley Betters, Monrovia, CA 91016
Alexandra Dolla, Hermosa Beach, CA 90254
J Caldron, Baldwin Park, CA 91706
Amanda Solosky, Playa Vista, CA 90094
Will B, Los Angeles, CA 90027
Kevin Le, Winnetka, CA 91306
Sanaz Parsi, Los Angeles, CA 90024
Denise Leos, Long Beach, CA 90808
Brandyce Howard, Long Beach, CA 90807
Miriam Cantor, Los Angeles, CA 90019
Grace Ssil, North Hollywood, CA 91605
Yvette St. Onge, Agoura Hills, CA 91301
Lisa Pedersen, Rancho Santa Margarita, CA 92688
Zachary Bainter, Los Angeles, CA 90045
James Atkinson, Los Angeles, CA 90027
Susan Hathaway, Pico Rivera, CA 90660
Tom McCown, Los Angeles, CA 90034
Angela Gardner, Whittier, CA 90604
Jennifer Herstein, Altadena, CA 91001
Fred Granlund, North Hollywood, CA 91601
Dan Esposito, Manhattan Beach, CA 90266
Chris Hernandez, Burbank, CA 91501
Gloria Aguirre, Castaic, CA 91384
Hillary Ostrow, Encino, CA 91316

Susan Chung, Los Angeles, CA 90032
Joy Schary, Sherman Oaks, CA 91423
Probyn Gregory, Tujunga, CA 91042
Karen Espanol, Culver City, CA 90230
Christopher Hall, Glendale, CA 91203
Frank Frattaroli, Los Angeles, CA 90004
Jason Nolasco, Bellflower, CA 90706
Fabiola Banuelos, Cerritos, CA 90703
Al Legittino, Beverly Hills, CA 90210
Judy Alter, , CA 90045
Ron Vanderford, Burbank, CA 91501
Steev Beeson, Los Angeles, CA 90005
Vivian Deutsch, Calabasas, CA 91302-3042
STACIE COX, Malibu, CA 90265
Carol Hewitt, Signal Hill, CA 90755
kate stemig, Hermosa Beach, CA 90254
Beth Goode, Topanga, CA 90290
Stephen Hutchinson, Glendale, CA 91202
John Palafoutas, Los Angeles, CA 90038
Elaine Livesey-Fassel, Los Angeles, CA 90064
Lindsay Barnett, Monrovia, CA 91016
Frances Goff, Pasadena, CA 91107
Gina Ortiz, Claremont, CA 91711
Susan McNulty, Downey, CA 90241
Angela Black, Long Beach, CA 90805
Renata Schrock, Lawndale, CA 90260
Melissa Adams, Los Angeles, CA 90019
Marc Silverman, Los Angeles, CA 90068
Jay Falconer, Long Beach, CA 90802
Rinko Hutchins, Los Angeles, CA 90041
Shannon Keifner, Chatsworth, CA 91311
Marc De Leon, Woodland Hills, CA 91364
Robert Herbst, Los Angeles, CA 90004
Reem Haddad, La Verne, CA 91750
Kristina Fukuda, Los Angeles, CA 90034
Richard Parr, Santa Monica, CA 90402
Tiffany-Marie Austin, Winnetka, CA 91306
Lily Sandoval, Pasadena, CA 91101
Regina Favarote, Pasadena, CA 91103
Neil Withnall, Los Angeles, CA 90012
Wendy Ann Rosenfeld, North Hollywood, CA 91601
Jessica Lacayo, Winnetka, CA 91306
carol banever, Los Angeles, CA 90046
Suzy Katsuda, Los Angeles, CA 90031
Gemma Eggleton, Beverly Hills, CA 90210
Sandra McLeod, Granada Hills, CA 91344
Alan Gonzalez, Long Beach, CA 90815
Julie Klabin, Los Angeles, CA 90027
Sonya Hanlon, Culver City, CA 90230
Kathy Cullen, Occidental, CA 95465
Sarah Friedman, Downey, CA 90241
Glenna Norris, Los Angeles, CA 90036
Wendy Pratt, Redondo Beach, CA 90277
Donna Shellabarger, Torrance, CA 90505
Damien De Castro, Mt Baldy, CA 91759

Jim Haley, Castaic, CA 91384
Kenneth Miller, Topanga, CA 90290
Margaret Phelps, Los Angeles, CA 90024
T. Acuna, Culver City, CA 90230
Ellen Kaufman, Chatsworth, CA 91311
geri Johnston, Altadena, CA 91001
Craig Barry, Culver City, CA 90230
David Jones, Beverly Hills, CA 90210
Jennifer Cole, Culver City, CA 90230
Sean Brandlin, El Segundo, CA 90245
Suzanne Alon, Valley Glen, CA 91401
Edie Emery, Pasadena, CA 91104
April Gustafsen, Glendale, CA 91202
Mark Price, Redondo Beach, CA 90278
Lynn Ryan, Torrance, CA 90505
Elaine Taylor, Glendale, CA 91205
Heather Parker, Glendale, CA 91214
Theresa Bucher, Tarzana, CA 91356
LA Ship, Van Nuys, CA 91401
Dorri Raskin, Northridge, CA 91326
Molly Rogers, Lancaster, CA 93535
Laurel Cameron, Redondo Beach, CA 90277
Keren Sookne, Culver City, CA 90230
Prisca Gloor, Los Angeles, CA 90066
Kathy Fujimoto, Manhattan Beach, CA 90266
William C. Briggs Jr, Hermosa Beach, CA 90254
Manuel Broulard, Calabasas, CA 91302
Susanna Knittel, Santa Monica, CA 90403
Lee B Slocum, Los Angeles, CA 90068
Colleen McCaskey, Los Angeles, CA 90066
Peter Canavan, Long Beach, CA 90804
Crystal Yagoobian, West Hollywood, CA 90069
Phyllis Easter, Inglewood, CA 90305
Cara Callaway, Palmdale, CA 93551
Cipra Nemeth, Los Angeles, CA 90048
Valerie Apple, Los Angeles, CA 90034
Evan Beattie, Los Angeles, CA 90029
Jacqueline Broulard, Calabasas, CA 91302
susan telese, Los Angeles, CA 90027
Gabriela Sosa, Los Angeles, CA 90027
Juliana Sorelli, Los Angeles, CA 90068
Kevin wightmaan, Los Angeles, CA 90026
Dominick Falzone, Los Angeles, CA 90005
Alexandra Haffner, Fallbrook, CA 92028
Amanda Caswell, Los Angeles, CA 90029
Karen Wellenkamp, West Hollywood, CA 90046
Carl Matthies, Pasadena, CA 91105
Heather Sabin, Los Angeles, CA 90065
Shannon Scrofano, Los Angeles, CA 90031
Kathleen Small, West Hollywood, CA 90046
Monica Embrey, Los Angeles, CA 90026
Matthew Gillespie, Redondo Beach, CA 90277
Annette Lopez, Panorama City, CA 91402
Ben White, Monrovia, CA 91016
Jenny Perez, Pomona, CA 91766
Christine Harbster, West Hollywood, CA 90046

Melissa Maccracken, Rolling Hills Estates, CA 90274
Araceli Aviles, Alhambra, CA 91803
William Schlesinger, Rancho Mirage, CA 92270
Mary Proteau, Los Angeles, CA 90036
Rosario Sandel, Reseda, CA 91335
Erica Munn, Los Angeles, CA 90028
Leslie Winston, Redondo Beach, CA 90278
Anita Youabian, Los Angeles, CA 90024
Corinna Bechko, Valley Village, CA 91607
Tai Stephan, Los Angeles, CA 90068
Michael Wauschek, Cerritos, CA 90703
Tracy Elliott, Studio City, CA 91602
Graciela Huth, Los Angeles, CA 90045
Erica Felsenthal, Beverly Hills, CA 90212
Mha Atma S Khalsa, Los Angeles, CA 90035
Rob Seltzer, Malibu, CA 90265
Rebecca A Behar Johnson, Long Beach, CA 90815
Michael Gordon, Lakewood, CA 90712
Thomas Conroy, Manhattan Beach, CA 90266
Hilary Young, Los Angeles, CA 90026
Rosiris Paniagua, Altadena, CA 91001
Stephanie Mitchell, Los Angeles, CA 90064
Kae Bender, Lancaster, CA 93536
Batsheva Kasdan, Los Angeles, CA 90035
David Scharf, Los Angeles, CA 90039
Francesco Masiello, Long Beach, CA 90804
Isabel Rosas, San Pedro, CA 90732
Jeffery Burkhart, Claremont, CA 91711
Ann Cantrell, Long Beach, CA 90808
Sharon Bills, Van Nuys, CA 91406
Tom Campbell, Redondo Beach, CA 90277
Carol Becker, Sherman Oaks, CA 91423
Anne Buttyan, Santa Monica, CA 90404
Ellen Segal, La Crescenta, CA 91214
David Rodgers, Santa Clarita, CA 91387
Dash Porter, Manhattan Beach, CA 90266
Mary Romanek, Santa Monica, CA 90404
George Ferrell, Santa Monica, CA 90402
Susan Bogdanovich, San Pedro, CA 90732
Anne Marlborough, Lake Balboa, CA 91406
Don Lukenbill, Sherman Oaks, CA 91403
Christine Sirias, Alhambra, CA 91801
SAMUEL POPAILO, West Hollywood, CA 90046
Jacqueline Welsh, Inglewood, CA 90301
Barbara Hargenrater, San Pedro, CA 90731
Cathy Kraus, North Hollywood, CA 91606
james hatchett, Reseda, CA 91335
Twyla Meyer, Pomona, CA 91767
Mary Anne Steinberger, Tujunga, CA 91042
Marguerite Shuster, Sierra Madre, CA 91024
Lisa Cash, Sherman Oaks, CA 91423
Donna Shaw, Simi Valley, CA 93065
Canan Tzelil, Beverly Hills, CA 90210
TENI HAKOPIAN, Glendale, CA 91201

Crystal Smith-Connelly, Los Angeles, CA 90027
Pauline Doucet, Pasadena, CA 91107
Christina Catlin, Los Angeles, CA 90041
Stephanie Corona, Downey, CA 90240
Anne Smith, Hermosa Beach, CA 90254
Barbara Schenk, Beverly Hills, CA 90212
Donald Sage Mackay, South Pasadena, CA 91031
Beth Herndobler, Pasadena, CA 91106
Adriana Baltazar, Los Angeles, CA 90006
Sylvia De Baca, San Dimas, CA 91773
mike capalbo, Downey, CA 90240
Leslie Gallagher, Los Angeles, CA 90064
Laurent Gabrielli, Valley Village, CA 91607
Amy Young, Reseda, CA 91335
Rachel Heil, Lakewood, CA 90712
Gordana Simunovic, West Hollywood, CA 90069
Bola Golena, Beverly Hills, CA 90210
Alan Levenson, Santa Monica, CA 90405
Maria Corvalan, Redondo Beach, CA 90278
Celeste Hong, Los Angeles, CA 90027
Kenneth Giang, El Monte, CA 91733
Hope Alexander, Venice, CA 90291
James Dwyer, Claremont, CA 91711
D. Rowe, Santa Monica, CA 90403
Christine Archambault, Beverly Hills, CA 90212
Kira Jannusch, Los Angeles, CA 90027
Patty Torres, Arleta, CA 91331
Mara B., Sherman Oaks, CA 91423
Page Marsella, Venice, CA 90291
Natalie Smith, Los Angeles, CA 90034
Kari French, Los Angeles, CA 90026
Tasya van Ree, Beverly Hills, CA 90213
Hope Goss, Lakewood, CA 90712
Nicholas Rulli, Los Angeles, CA 90026
Tara Beier, Landers, CA 92285
Diana Pash, La Verne, CA 91750
Erna Toback PhD, Studio City, CA 91604
Nancy Petersen, Claremont, CA 91711
Yazmin Gonzalez, Bellflower, CA 90706
joanne Jubelier, Los Angeles, CA 90049
Tim Hanson, Santa Monica, CA 90405
Karla Mejia, Canyon Country, CA 91387
Kathie Kingett, La Habra Heights, CA 90631
Victoria Brandon, Northridge, CA 91325
Adrienne Davis, Santa Barbara, CA 93103
Abbie Bernstein, West Hollywood, CA 90069
Jeffrey Levicke, Valley Village, CA 91607
Norma Faith Rockman, Los Angeles, CA 90036
Alyza Cornett, Los Angeles, CA 90056
Barbara Roe, Santa Monica, CA 90405
Valerie Goldberg, Calabasas, CA 91372
Taryn Braband, Agoura, CA 91301
Ramona Coronado, Pasadena, CA 91106
Melvyn Nefsky, Los Angeles, CA 90064
janet maker, Los Angeles, CA 90024

Sharon Torrisi, Hermosa Beach, CA 90254
Scott Rubel, Los Angeles, CA 90031
Timothy Viselli, La Canada, CA 91011
Carmen Carrasco, Studio City, CA 91604
Javier Del Valle, Montebello, CA 90640
Peter Berg, Burbank, CA 91505
Soraya Dosaj, Valley Glen, CA 91401
Henry Schlinger, Glendale, CA 91201
CHRISTOPHER PARSONS, Los Angeles, CA 90027
Paula Glaser, Pico Rivera, CA 90660
Melanie Fisher, Temecula, CA 92591
Michael Wisniewski, Hacienda Heights, CA 91745
Lisette Rose, Los Angeles, CA 90034
Brett Bell, Tujunga, CA 91042
Mary Prall, Los Angeles, CA 90042
Barbara Heiman, Marina Del Rey, CA 90295
Irene Snavely, Covina, CA 91724
Mario Rivas, Pasadena, CA 91106
Sara Flamm, Los Angeles, CA 90034
Robert Russo, Glendora, CA 91741
Noelle Eagle, Reseda, CA 91335
A.F. shayne, Los Angeles, CA 90036
Damien Luzzo, Dixon, CA 95620
Lori Dick, Claremont, CA 91711
Laura Strom, Los Angeles, CA 90034
Venetia Large, Altadena, CA 91003
Raymond Plasse, West Hills, CA 91307
Taj Lalwani, Los Angeles, CA 90064
Ronni Solman, Los Angeles, CA 90042
dora cano, Los Angeles, CA 90026
Judith Barnett, Tarzana, CA 91356
Hannah MacLaren, Altadena, CA 91001
Beniko Yamasaki, Artesia, CA 90701
Josephine Eure, Los Angeles, CA 90008
Deborah Kelly, Pasadena, CA 91106
Maureen Toth, Los Angeles, CA 90028
Fernando Pasillas, Whittier, CA 90603
Diana Gitelman, Sherman Oaks, CA 91401
James Goodwin, Los Angeles, CA 90068
Bill Evans, Pasadena, CA 91104
Amy Pawlukiewicz, Reseda, CA 91335
Ann Dorsey, Northridge, CA 91325
Anna Buenrostro, Los Angeles, CA 90011
Karen LeBrun, Alhambra, CA 91803
Don Bush, Los Angeles, CA 90066
Jerry Oliver, Sylmar, CA 91342
Rita Franco, Monrovia, CA 91016
John Paciorek, San Gabriel, CA 91775
Julie Svendsen, Burbank, CA 91505
Denise Vandermeer, Woodland Hills, CA 91367
Alexandra Hopkins, La Crescenta, CA 91214
Rokhsan Taherpour, Tarzana, CA 91356
Janice Baxter, North Hills, CA 91343
Eve Foist, Long Beach, CA 90803

Diana De Mirjian, Van Nuys, CA 91401
Karen Lull, Claremont, CA 91711
ted Hume, Los Angeles, CA 90011
Matt Lovio, San Gabriel, CA 91775
Carolina Adler, Woodland Hills, CA 91367
Andrea Kraus, West Hollywood, CA 90069
Jay Hong, Long Beach, CA 90807
Andi Brittan, Los Angeles, CA 90019
Binh Tang, Chatsworth, CA 91311
Eric Mattei, West Hills, CA 91304
George Grace, Los Angeles, CA 90027
Blake McLean, Long Beach, CA 90815
Angela Gygi, Los Angeles, CA 90068
Elisabeth Edwards, Los Angeles, CA 90041
Charlotte Innes, Los Angeles, CA 90026
stephanie costi, Playa Del Rey, CA 90293
Jane Nachazel-Ruck, Los Angeles, CA 90026
Richard Kornfeld, Pasadena, CA 91105
Bill Mikulak, Sherman Oaks, CA 91423
Amanda Mauceri, View Park, CA 90043
J Brown, Ventura, CA 93004
Mr Kornfeld, Pasadena, CA 91105
Mindi Mindi, Los Angeles, CA 90046
Pamela Magathan, Los Angeles, CA 90068
Jasna Grujic-Ciric, Newhall, CA 91321
Brent Lund, Pasadena, CA 91101
Patricia Rockoff, Santa Monica, CA 90405
Veronica Carrington, Los Angeles, CA 90039
J Kim, Los Angeles, CA 90020
Jenee Bridges, Marina Del Rey, CA 90292
Susan Goodman, Santa Monica, CA 90404
Robyn Sumners, North Hollywood, CA 91601
O Lewis, Los Angeles, CA 90009
Denis Pettitt, Burbank, CA 91505
Holly Burgin, Van Nuys, CA 91405
Disa BALDERAMA, Downey, CA 90241
Carol Gordon, Los Angeles, CA 90027
Sara Fogan, Santa Clarita, CA 91385
Rosanne Basu, Hermosa Beach, CA 90254
Ileene Anderson, Los Angeles, CA 90046
Peter Weinberger, Los Angeles, CA 90036
Mir Faugno, Playa Del Rey, CA 90293
Isaac Salazar, Los Angeles, CA 90036
Katherine King, Venice, CA 90291
Richard Shepard, Cambria, CA 93428
Steven Acosta, Los Angeles, CA 90011
judith lotz, Burbank, CA 91505
James Brown, Los Angeles, CA 90034
Amy Stinstrom, Sherman Oaks, CA 91411
Kira Durbin, Sherman Oaks, CA 91411
Dara Gorelick, Van Nuys, CA 91406
Bradley Sausser, Pacific Palisades, CA 90272
Frank Ortiz, Los Angeles, CA 90022
Bettina Graf, Pasadena, CA 91106
Roshan Reporter, Los Angeles, CA 90039

Rosemary Graham-Gardner, Manhattan Beach, CA 90266
Lisa Garvey, Hidden Hills, CA 91302
Kurt Cruger, Long Beach, CA 90803
Frank Poppie Poppie, Monterey Park, CA 91755
Alison Dice, Lakewood, CA 90713
Brent Riggs, Inglewood, CA 90302
Julie Stein, Arleta, CA 91331
Brian Fingeret, Woodland Hills, CA 91364
Susan Sloan, Los Angeles, CA 90064
Susan Hanger, Topanga, CA 90290
Sherry Handy, Pasadena, CA 91107
Anna Acosta, South Gate, CA 90280
Val Longo, Los Angeles, CA 90021
Diana Horowitz, Woodland Hills, CA 91367
Janna Gelfand, Los Angeles, CA 90049
Nabila Badawy, Redondo Beach, CA 90277
Molly Zalman, Los Angeles, CA 90020
Bonnie Karrin, West Hollywood, CA 90046
Kristin Baker, Long Beach, CA 90808
Leslie Gonzales, Lancaster, CA 93536
Mine Breidegam, Canoga Park, CA 91304
Stephane Ernoux, Redondo Beach, CA 90278
Izzy Rosenstein, Santa Monica, CA 90402
Cornelia Southwick, Los Angeles, CA 90036
Pamela Haddad, Los Angeles, CA 90016
Joseph Olynyk, Santa Clarita, CA 91390
Anne Hoop, Long Beach, CA 90803
Robert Peters, Porter Ranch, CA 91326
Ms Bell, Beverly Hills, CA 90210
T Linebrink, Los Angeles, CA 90015
M Lynch, Santa Monica, CA 90405
Garry Melonson, Los Angeles, CA 90003
David Gutierrez, Pasadena, CA 91101
Sheila Willens, Los Angeles, CA 90046
Du Ng, San Jose, CA 95123
Michelle Alexander, Los Angeles, CA 90027
Thomas Carlton, Culver City, CA 90232
April De Stefano, Santa Monica, CA 90404
Travis Swans, Long Beach, CA 90802
Rosa Manriquez, Los Angeles, CA 90022
James Zidell, Los Angeles, CA 90049
Cameron Urr, Long Beach, CA 90805
Lori Rogalski, Los Angeles, CA 90065
Benjamin Reicher, Agoura Hills, CA 91301
Renee Cossutta, Sierra Madre, CA 91024
James M Villalobos, Los Angeles, CA 90027
Susan Goran, Tarzana, CA 91356
Martha Jones, Santa Clarita, CA 91350
Mariam Shah-Rais, Los Angeles, CA 90035
Eileen Karzen, Los Angeles, CA 90064-1963
Linda Lyke, Los Angeles, CA 90065
Emma Ausman, Toluca Lake, CA 91602
Susi Higgins, Glendale, CA 91203
Julie Binchet, Los Angeles, CA 90067
Linda Snow, Los Angeles, CA 90019

Cabell Smith, Pacific Palisades, CA 90272
emme g, Beverly Hills, CA 90210
Jeff Fromberg, , Ca 90024
Jerry Schneider, Los Angeles, CA 90065
Nancy Zaman, Beverly Hills, CA 90212
Jean Sinclair, Burbank, CA 91501
Tahesha Knapp-Christensen, Long Beach, CA 90802
Traci Balzaret, West Hollywood, CA 90069
Jana Pendragon, Long Beach, CA 90807
Andres Echeverria, Culver City, CA 90232
Deborah Clanton, Canoga Park, CA 91304
Mark Coria, Los Angeles, CA 90032
Daniel Medrano, Wilmington, CA 92688
Billie Lee Langley, Torrance, CA 90501
laura Divenere, Los Angeles, CA 90020
Gloria Roth, Long Beach, CA 90803
Natalie Torres, San Pedro, CA 90731
Judith Forman, Van Nuys, CA 91411
Yvonne Mao, La Canada Flintridge, CA 91011
Stephen McClure, Canyon Country, CA 91387
Rachel Weil, Marina Del Rey, CA 90292
Carmel Dagan, Los Angeles, CA 90048
Kathleen Ford, Burbank, CA 91505
Robert SOOS, Pasadena, CA 91104
Twila Roth, Encinitas, CA 92023
Judith Valentine, Tarzana, CA 91335
Michael Reppenhagen, Beverly Hills, CA 90210
Daniel Tiarks, Los Angeles, CA 90046
Ashley Pease, Tarzana, CA 91356
Sherrell Cuneo, Los Angeles, CA 90027
William Stern, Burbank, CA 91504
Rhea Damon, Calabasas, CA 91302
Robert Pann, Los Angeles, CA 90064
Janet Laur, Van Nuys, CA 91405
Caroline Blake, Arcadia, CA 91007
Marie DiMassa, Long Beach, CA 90807
Mary McAuliffe, Los Angeles, CA 90028
Marion Baer, Los Angeles, CA 90066
Pamela Gibberman, Panorama City, CA 91402
Mindi White, Los Angeles, CA 90046
Jamie Scott, Pasadena, CA 91105
Steven Pickering, Pasadena, CA 91107
Alexander Dunaev, Sherman Oaks, CA 91403
Kristy Pace, Sherman Oaks, CA 91423
Mike Laquatra, Long Beach, CA 90806
Robert Clark, West Covina, CA 91791
Margaret Tollner, Lakewood, CA 90713
Joyce Campbell, Torrance, CA 90505
Billy Arcila, Pasadena, CA 91106
Eric Ericson, Beverly Hills, CA 90210
Ronald Warren, Glendale, CA 91206
Catherine Beauchamp, Pasadena, CA 91103
Brenda Haig, Long Beach, CA 90803
Anna Friedman, Malibu, CA 90265
Patricia Moorehead, North Hills, CA 91343

Marilyn Carney, North Hollywood, CA 91606
Sarah Murdoch, Pacific Palisades, CA 90272
Clara Beard, Los Angeles, CA 90066
Lynne Miller, Malibu, CA 90265
Eileen Greenberg, North Hollywood, CA 91606
Darienne Hetherman, Altadena, CA 91001
Caterina Janacua, Sherman Oaks, CA 91423
Philip Patino, Pico Rivera, CA 90660
Suzanne Licht, San Pedro, CA 90731
Michelle Naden, Santa Monica, CA 90403
Tara Grenier, Los Angeles, CA 90029
Janet Heinle, Santa Monica, CA 90403
Edda Spielmann, Santa Monica, CA 90405
Katy Jafari, Canoga Park, CA 91304
Marilyn Lavender, Los Angeles, CA 90016
Margarita Perez, Sylmar, CA 91342
Linda Lehnkering, Anaheim, CA 92805
robert spaccarotelli, Pomona, CA 91767
Jessie Cowley, Canoga Park, CA 91303
Iliana Lopez, Palmdale, CA 93591
kajsa ingelsson, West Hollywood, CA 90046
anna meyer, Los Angeles, CA 90034
M Freedman, Tarzana, CA 91356
David W. Jenks, Reseda, CA 91335
Walt Bellhaven, Beverly Hills, CA 90211
Erik Vanlier, Van Nuys, CA 91405
Barbara Samuels, Tarzana, CA 91356
Jennifer Yamamoto, Manhattan Bch, CA 90266
Gary Charles, Long Beach, CA 90813
Alicia Copeland, Covina, CA 91724
Andrea Bonnett, Altadena, CA 91001
Barbara Carson, Palmdale, CA 93551
Vivian Woolfson, Altadena, CA 91001
Mike Huwe, Manhattan Beach, CA 90266
Carlos Nunez, Reseda, CA 91335
A.L. Watts, Los Angeles, CA 90065
Dennis and Andrea Hopkins, Monrovia, CA 91016
Rob Gallinger, Menifee, CA 92586
Kelly Kelly, El Segundo, CA 90245
Tracey Carlisle, Glendale, CA 91202
Dana Kinonen, Torrance, CA 90505
Pepi Feinblatt, Pasadena, CA 91104
Reanna Flores, Los Angeles, CA 90032
Gale Dorion, Los Angeles, CA 90068
Yessenia Quintero, South Gate, CA 90280
Thomas Zachary, La Crescenta, CA 91214
Jean Lawson, Pomona, CA 91767
Jeff Matsuno, Redondo Beach, CA 90277
barbara heitz, Los Angeles, CA 90049
Margarita Gonzalez, Sylmar, CA 91342
Wendi Gladstone, Chatsworth, CA 91311
John Crahan, Los Angeles, CA 90045
Avie Hern, Los Angeles, CA 90049
Heidi Wedekind, Covina, CA 91724
Trina Pak, Valley Village, CA 91607

Jennifer Kutner, Los Angeles, CA 90069
G. S., Los Angeles, CA 90025
Barry Kogen, Long Beach, CA 90808
Dr. Mha Atma S Khalsa, Los Angeles, CA 90035
Scott Enge, Culver City, CA 90230
Robyn Sharp, Topanga, CA 90290
Sean O'Keeffe, Los Angeles, CA 90064
Najwa Omar, Pomona, CA 91767
Stephanie Jenkins, Los Angeles, CA 90042
Linda Masuoka, Redondo Beach, CA 90277
.James Hamilton, Palos Verdes Estates, CA 90274
Rd Plasschaert, Los Angeles, CA 90057
Rosemary Shiolas, Westlake Village, CA 91361
Barry Backer, Playa Del Rey, CA 90293
Joel Isaacs, Venice, CA 90291
Heidi Fielding, N Hollywood, CA 91606
Paul Edelman, Woodland Hills, CA 91364
Davis Montalvan, Rancho Palos Verdes, CA 90275
Helene Minniti, Canyon Country, CA 91351
Cathy Thornburn, Los Angeles, CA 90041
Darrell Clarke, Pasadena, CA 91101
Gregg Oelker, Altadena, CA 91001
Jackie Bear, Los Angeles, CA 90048
Christina Marx, Marina Del Rey, CA 90295
Kathy Miller-Fujimoto, Manhattan Beach, CA 90266
Dorrit Ragosine, Los Angeles, CA 90068
Chuck hendrickson, Los Angeles, CA 90027
Kuniko Vroman, Los Angeles, CA 90041
Lisa Mandarino, Redondo Beach, CA 90278
William Visevich, West Hollywood, CA 90046
Daniel Gonzales, Lancaster, CA 93536
Mijanou Bauchau, Agoura Hills, CA 91301
Mark Reback, Los Angeles, CA 90039
Jim Leske, North Hills, CA 91343
Chris Leverich, Playa Del Rey, CA 90293
Maria Gritsch, Los Angeles, CA 90046
Martin Tripp, Santa Clarita, CA 91390
Stephanie Larro, Woodland Hills, CA 91367
Mark Newman-Kuzel, Los Angeles, CA 90039
Sue Petteway, Los Angeles, CA 90012
George Leddy, Los Angeles, CA 90046
Linda Monosmith, Hermosa Beach, CA 90254
Gregory Alper, Pacific Palisades, CA 90272
Carl Cartwright, Whittier, CA 90605
David Maillet, Chatsworth, CA 91311
Tony Grijalva, Los Angeles, CA 90068
Linda Trujillo, Van Nuys, CA 91405
Mike Breidegam, Canoga Park, CA 91304
Teresa Arredondo, Van Nuys, CA 91405
Ken Davis, Diamond Bar, CA 91765
Jenifer Morgan, Redondo Beach, CA 90278
Matthew Lubs, El Segundo, CA 90245
Lissete Garcia, Los Angeles, CA 90034

Robert Hogg, Northridge, CA 91325
Rosanna Power, Los Angeles, CA 90045
Jia Quan, West Covina, CA 91791
Ava Dhira, Altadena, CA 91001
Sofia Ratcovich, Santa Monica, CA 90404
Rohan Sabnis, Claremont, CA 91711
irene fernandez, Alhambra, CA 91801
Bob Wandle, Beverly Hills, CA 90210
linda martinez, Los Angeles, CA 90032
Diana Dee, Van Nuys, CA 91401
Kyle Yaskin, Los Angeles, CA 90046
Rachelle Arslan, Los Angeles, CA 90039
david alvarado, Los Angeles, CA 90034
Jeff Urdank, Sherman Oaks, CA 91403
Kenneth Graham, Los Angeles, CA 90025
Ken Gould, Los Angeles, CA 90024
Marlyn Gibson, Los Angeles, CA 90045
John Quigley, Woodland Hills, CA 91364
Sandra Garmon, Redondo Beach, CA 90277
Ava LeMasters, Los Angeles, CA 90068
dillu ashby, Altadena, CA 91001
Elliot Gonzales, Long Beach, CA 90813
Kim Hume, Los Angeles, CA 90007
Ashley Meza, Montebello, CA 90640
Nils Jepson, Van Nuys, CA 91406
Charmaine Breitengross, Los Angeles, CA 90027
Miguel Oaks, Los Angeles, CA 90005
Jane August, Topanga, CA 90290
Karen Kim, Los Angeles, CA 90019
Hilarey Benda, Sherman Oaks, CA 91423
annabelle nye, West Hills, CA 91307
Cyndi Myatt, El Segundo, CA 90245
Roger Hollander, Tarzana, CA 91356
Madeline Wright, Los Angeles, CA 90045
Cathey Schneider, Agoura Hills, CA 91301
Ken Stack, Los Angeles, CA 90004
Charleen Steeves, Topanga, CA 90290
Jan Repp, Baldwin Park, CA 91706
Jennifer Gharavi, Beverly Hills, CA 90210
Myra Schegloff, Santa Monica, CA 90405
Jane Brockman, Culver City, CA 90232
Sheda Morshed, Pacific Palisades, CA 90272
Joel Rane, Los Angeles, CA 90043
Eryn Lauckern, Los Angeles, CA 90028
Blaise Brockman, Arcadia, CA 91007
Terri Gedo, Los Angeles, CA 90045
Nancy Smith, Santa Monica, CA 90401-2605
Brent Spencer, Paramount, CA 90723
Rita Thio, Walnut, CA 91789
molly zbojniewicz, Manhattan Beach, CA 90266
Misty Alderaan, Duarte, CA 91010
Tracy watada, Marina Del Rey, CA 90292
Lou Insprucker, La Canada Flintridge, CA 91011
Jason LaBerge, Malibu, CA 90265
Linda Howie, Woodland Hills, CA 91367

Patricia Marlatt, Los Angeles, CA 90068
Lisa-Marguerite Mora, Los Angeles, CA 90066
Jacqueline Ambriz, Whittier, CA 90603
Garrett Weinstein, West Hills, CA 91307
Richard Cox, Venice, CA 90291
Jessica de Ruiten, Los Angeles, CA 90039
Leonard Way, Rowland Heights, CA 91748
Linda Klein, El Segundo, CA 90245
Jessica Johnston, Los Angeles, CA 90033
Deb Farmer, West Hollywood, CA 90046
Chris Huff, San Pedro, CA 90731
Richard Perez, Torrance, CA 90510
Phyllis Chavez, Santa Monica, CA 90405
Sylvia Ruiz, Los Angeles, CA 90086
Judith King-Rundel, Rancho Palos Verdes, CA 90275
Stacey Vigallon, Los Angeles, CA 90066
Kathy Dorr, La Verne, CA 91750
Bonnie Elsten, Long Beach, CA 90803
Anna Christensen, Long Beach, CA 90803
Lisa Hammermeister, Granada Hills, CA 91344
Cinzia Paganuzzi, Santa Monica, CA 90405
Shea Rowan, Sherman Oaks, CA 91423
Julie Ries, Topanga, CA 90290
Lee Eames, Long Beach, CA 90815
Joan Kaplan, Altadena, CA 91001
Rose Bryan, Lancaster, CA 93536
Toshio Ozawa, San Gabriel, CA 91775
Arax Maksoudian, Glendale, CA 91206
Elizabeth Gonzalez, Long Beach, CA 90805
Carol Royce-Wilder, Venice, CA 90291
MARY ELLEN BRADEN, Glendale, CA 91208
Jane Levine, Panorama City, CA 91412
Barbara Ardinger, Long Beach, CA 90802
Parviz Khazaei, , CA 90014
Barbara Wasserman, Chatsworth, CA 91311
Bonnie Maloney, Hawthorne, CA 90250
Elizabeth Hall, Porter Ranch, CA 91326
Nancy Kahakauwila, Long Beach, CA 90803
Darren Frale, Los Angeles, CA 90065
Johana Moran, Crescent City, CA 95531
Sheila Sperber, Los Angeles, CA 90025
david salinas, Castaic, CA 91384
Brandon Lyddon, Los Angeles, CA 90002
Beth Stein, Los Angeles, CA 90066
andres suarez, Hermosa Beach, CA 90254
JASON NAKAGAWA, Los Angeles, CA 90066
federico figus, North Hollywood, CA 91602
Mark Morgan, Los Angeles, CA 90039
Collette Rutherford, Los Angeles, CA 90064
Gary Allen, Beverly Hills, CA 90211
James Mulligan, Claremont, CA 91711
Elizabeth Reid-wainscoat, Los Angeles, CA 90034
Gloria Albert, Santa Monica, CA 90403
Margie Rosenblum, Los Angeles, CA 90039

Penelope Ward, Topanga, CA 90290
Suzanne Weitz, Rolling Hills Estates, CA 90274
Laura Deibel, Sherman Oaks, CA 91423
Christina Babst, West Hollywood, CA 90069
Kathie Fierro, Van Nuys, CA 91406
Deborah Jenkins, Hacienda Heights, CA 91745
Richard Behymer, Sacramento, CA 95864
Barbara Mesney, Los Angeles, CA 90066
Wendy Brandchaft, Topanga, CA 90290
Patricia Zeider, Pasadena, CA 91104
F. R. Eguren, Redondo Beach, CA 90277
Mike Maynard, Pacific Palisades, CA 90272
kare m, Beverly Hills, CA 90213
Heather Parekh, Beverly Hills, CA 90210
Bill Dunn, West Hills, CA 91307
Gary Marlowe, West Hollywood, CA 90069
Carolyn Flook, Santa Monica, CA 90405
Lynne Ann, Los Angeles, CA 90048
Margot Griswold, Los Angeles, CA 90066
Sara Wall, Long Beach, CA 90805
Jerffery Doer, Los Angeles, CA 90057
Vicki Gallegos, Lancaster, CA 93534
Nanine Beal, Glendale, CA 91202
Carolina Goodman, Sherman Oaks, CA 91401
Phil OBrien, Whittier, CA 90601
Tim Cox, Claremont, CA 91711
Jim G Gwin Gwin, Tarzana, CA 91356
Gaille Heidemann, Los Angeles, CA 90024
Dominic Estrada, Lancaster, CA 93536
Brennan Balson, Marina Del Rey, CA 90292
Ashley Wren, Los Angeles, CA 90034
David Camp, Burbank, CA 91501
Bryce King, Eureka, CA 95501
Kelly Wood, Pasadena, CA 91104
S M, Los Angeles, CA 90033
Ken Hughes, Van Nuys, CA 91402
John Martinez, Lomita, CA 90717
Carey Bennett, Los Angeles, CA 90027
G Devine, Altadena, CA 91001
Sue Michelson, Studio City, CA 91604
Karla Devine, Manhattan Beach, CA 90266
S Stoveken, Long Beach, CA 90802
Robert Doucette, Playa Del Rey, CA 90293
Darren Spurr, Whittier, CA 90608
Victoria Miller, Encino, CA 91436
Scott Jung, South Pasadena, CA 91030
Melissa Bergemann, Venice, CA 90291
Inna Gergel, Granada Hills, CA 91344
Dena Schwimmer, Los Angeles, CA 90019
Sophia Kang, Rancho Palos Verdes, CA 90275
DAVID MACTAGGART, Lancaster, CA 93536
Mel Marcus, Long Beach, CA 90808
Margaret Whited, La Mesa, CA 91941
Kate Mellors, Glendale, CA 91205
Sarah Frutig, Arleta, CA 91331
Diane Doesserich, Playa Del Rey, CA 90293

William Winburn, Rancho Palos Verdes, CA 90275
Steve Hanlon, Los Angeles, CA 90049
linda michaelson, Agoura Hills, CA 91301
Tina Pirazzi, Long Beach, CA 90814
Doug and Karen Lenier, Valley Glen, CA 91401
Ann Bein, Los Angeles, CA 90064
jerry persky, Santa Monica, CA 90403
Subir Trivedi, Santa Monica, CA 90403
David Carlson, Los Angeles, CA 90069
joie winnick, Sherman Oaks, CA 91423
Chris Paine, Culver City, CA 90232
Marilyn Dennis, North Hills, CA 91343
Dave Rock, Los Angeles, CA 90042
Jill Davine, Culver City, CA 90232-3207
Alicia Salazar, Los Angeles, CA 90032
Alejandro Artigas, Glendale, CA 91206
Jayne Pitchford, Santa Monica, CA 90403
Aixa Fielder, Los Angeles, CA 90028
Felicia Chase, Encino, CA 91436
Levinson Rodriguez, Mission Hills, CA 91345
korinna Shan., , California 95136



1608 Norris Road • Bakersfield, CA 93308

September 26, 2022

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Oil Well Ordinance. Project Number PRJ2020-000246-(1-5). Advance Planning Case Number RPPL2020000624

Dear Supervisors:

E&B Natural Resources (E&B) provides the following comments relating to the LA County proposed Oil & Gas Ordinance.

E&B is a California-based oil and gas producer. We produce over 8,000 barrels of oil per day for Californians including Los Angelenos. We have over 250 staff working for us, many in the Los Angeles area. This year, E&B acquired some of the assets from Brea Canon Oil Company and we look forward to continuing to work with the County of Los Angeles on the draft ordinance. E&B is dedicated to producing the cleanest and most environmentally friendly oil and natural gas in the world. We operate in full compliance with rules and regulations administered by over multiple agencies at the local, state, and federal levels. We deliver consistent income for the many royalty owners in Los Angeles. We have a personal and collective interest in adhering to California's stringent environmental regulations to protect the safety of our workforce.

We have all witnessed over these last weeks and months and years (i.e., Ukraine and Russia event, COVID-19, supply chain issues, etc.) how important it is to be able to source things and buy locally. Our workforce and product have been recognized as critical and essential to our nation, to our state and to our local economies. We believe that producing locally is in the best interests for the economy and the environment. It does not have to be one over the other. Together we can continue to show leadership in both areas.

This proposed ordinance is concerning in many areas.

We urge the County to study the environmental effects of losing its local production, particularly potential air emissions. Reducing local production often leads to an increase in imports. These foreign imports would increase super tanker traffic to our local ports in Long Beach and Los

California • Kansas • Louisiana • Wyoming

Bus: (661) 387-8500 • www.ebresources.com • Fax: (661) 687-8690



1608 Norris Road • Bakersfield, CA 93308

Angeles. South Coast Air Quality Management District considers pollution from the ports as one of the leading causes of local air pollution. We also urge the County to study the countries supplying foreign imports, their human rights records and the countries' environmental regulations. Where will one of the largest local economies in the world continue to get its oil?

In the proposed ordinance, the County calls for an amortization period of existing wells and facilities. We believe that the County's "potential" amortization program / period has no support in fact or in law and instead serves only to violate E&B's constitutionally protected vested rights as well as the rights of the mineral owners. We recommend that the County work with the operators, mineral owners and stakeholders to find the right balance of best practices, regulations and good neighbor provisions. We don't believe the County has done any outreach to the mineral owners. This is a concern.

Bonding Requirements within the draft ordinance need to be clearer with how the amounts will be determined. The ordinance does not consider the bonding requirements that the operators currently have with the state agency, CalGEM. We believe there should be some flexibility to work with the County on meeting any new bonding requirements, such as self-insurance.

It is our hope that we can continue to work together towards a new ordinance that works for all parties. Please do not hesitate to call upon us for additional information. Thank you for your time and consideration of our comments.

Best regards,

A handwritten signature in blue ink, appearing to read 'Louis Zylstra', is written over a light blue horizontal line.

Louis Zylstra, PE
Senior Vice President, Los Angeles Basin
E&B Natural Resources

REFERENCES

1. South Coast Air Quality Management District,
<https://www.aqmd.gov/nav/about/initiatives/clean-port>

California • Kansas • Louisiana • Wyoming

Bus: (661) 387-8500 • www.ebresources.com • Fax: (661) 687-8690

September 26, 2022

Supervisor Holly Mitchell, Chair, 2nd District
Supervisor Hilda Solis, 1st District
Supervisor Sheila Kuehl, 3rd District
Supervisor Janice Hahn, 4th District
Supervisor Kathryn Barger, 5th District
Los Angeles County Board of Supervisors
500 West Temple St., Suite 383
Los Angeles, CA 90012

RE: Oil Well Ordinance, Plan No. RPPL2020000624 - **SUPPORT**

Dear Honorable Supervisors of Los Angeles County:

We are writing on behalf of over 130 environmental justice, environmental, health, community, labor and faith organizations to commend your historic commitment to prioritize the health, safety and well-being of Los Angeles County residents by instructing the Department of Regional Planning (“DRP”) to amend LA County’s Planning and Zoning Code (Title 22) to prohibit all new oil wells and production facilities and designate all existing oil wells and production facilities as nonconforming uses. Our organizations are deeply concerned about both the acute and chronic harms to the people and communities we represent from pollution caused by the extraction, processing, and burning of fossil fuels. We support DRP’s amendments to Title 22 and urge the Board to adopt the proposed Oil Well Ordinance. We recognize that the adoption of the Oil Well Ordinance is a necessary first step to ensure oil drilling is eventually phased out throughout *all* of unincorporated Los Angeles County and we look forward to continuously working with this Board and DRP to ensure that residents living around the Inglewood Oil Field share this same benefit.

The Board’s adoption of the proposed Oil Well Ordinance is essential to protect our communities and is consistent with the growing body of scientific literature that demonstrates the risks and dangers of allowing oil drilling near homes, schools, and other sensitive sites. In unincorporated Los Angeles County, there are nearly 2,000 active and idle oil and gas wells and the majority are located within 2,500 feet of homes, schools, and hospitals.¹ More than 580,000 Los Angeles

¹ “Urban Oil and Gas Production in Los Angeles County,” USC Environmental Health, August 6, 2019.
<https://envhealthcenters.usc.edu/2019/08/urban-oil-and-gas-production-in-lacounty.html>

County residents live within one-quarter mile of an actively producing oil and gas well.² Los Angeles County communities of color live disproportionately near oil and gas wells and suffer greater health harms: 44 percent of Black, 37 percent of Latinos, and 38 percent of Asian residents live near oil and gas wells, compared to 31 percent of White residents.³ By adopting the proposed Oil Well Ordinance, the Board is protecting its residents from harmful local pollution that unduly burdens workers, low-income communities, and communities of color.

Our coalition understands that adopting the proposed Oil Well Ordinance is the first of many steps the County must take to phase out oil drilling in Los Angeles County. We also understand that with more than half of the oil wells in unincorporated Los Angeles County concentrated in the Inglewood Oil Field, the County must quickly ensure that this Board's September 2021 motion to phase out oil drilling applies to the Inglewood Oil Field. As such, once the proposed ordinance takes effect, this Board should ensure that the Department of Regional Planning concurrently amends the Baldwin Hills Community Standards District, as DRP stated its intention to do in its September 27, 2022 letter to the Board. We urge DRP to amend the Baldwin Hills Community Standards District and individual specific plans to immediately prohibit new wells and to set a timeline to wind down existing production. Phasing out oil drilling throughout the County, including at the Inglewood Oil Field, is consistent with recommendations in LA County's own OurCounty sustainability plan, state and federal policies to reduce carbon emissions to maintain a livable planet, policies being pursued by a growing number of other local jurisdictions including the City of Los Angeles and Culver City, and recent legislative action in California that prevents new permits for oil drilling within 3,200 feet of a sensitive receptor.

We thank this Board for your commitment to make Los Angeles County a healthier place for all, particularly for residents most impacted by the harmful pollution and operational hazards associated with existing oil production. We urge you to adopt the proposed Oil Well Ordinance and look forward to our continued collaboration.

Respectfully,

Alan Weiner, Chapter Lead, 350 Conejo - San Fernando Valley

Alex Marquardt, Co-Founder and Staff Attorney, Climate Defense Project

Alison Hahm, Associate Attorney, Communities for a Better Environment

Allis Druffel, Southern California Director, California Interfaith Power & Light

Amanda Perez, Executive Director, Maravilla Historical Society

Amanda Tapia, Co-Founding Organizer, The People of South Gate

² O'Connor et al. "Filling the Void," Environmental Defense Fund, 2017

https://www.edf.org/sites/default/files/california-monitoring_filling-the-void.pdf

³ Srebotnjak, Tanja and Miriam Rotkin-Ellman, "Drilling in California: Who's at risk?," Natural Resources Defense Council, October 2014, p. 4. <https://www.nrdc.org/sites/default/files/california-fracking-risks-report.pdf>

Andrea Leon-Grossmann, Director of Climate Action, Azul
Andy Hattala, Co-Chair, The Climate Reality Project Los Angeles
Anna Cummins, Executive Director, The 5 Gyres Institute
Arnulfo de la Cruz, Executive Vice President, SEIU Local 2015
Bahram Fazeli, Director of Research and Policy, Communities for a Better Environment and Co-Chair of STAND-LA
Belen Bernal, Executive Director, Nature for All
Ben Lara, President, El Sereno Stallions
Ben Stapleton, Executive Director, United States Green Building Chapter - Los Angeles
Brigid Lawlor, Province Advocacy Liaison, Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces
Bruce Gagnon, Coordinator, Global Network Against Weapons & Nuclear Power in Space
Bruce Reznik, Executive Director, LA Waterkeeper
Caroline Henderson, Senior Campaigner, Greenpeace USA
Carolyn Chriss, Group Leader, East Valley Indivisibles
Chelsea Kirk, Research and Policy Analyst, Strategic Actions for a Just Economy
Cheryl Auger, President, Ban SUP
Dan Ress, Staff Attorney, Center on Race, Poverty & the Environment
Daniel Tamm, Chair, Interfaith Solidarity Network
Danny Hom, Strategy Officer, GRID Alternatives Greater Los Angeles
David Diaz, Executive Director, Active San Gabriel Valley
David Haake and Nicole Levin, Chair of Clean Break Committee and Campaign Representative, Beyond Dirty Fuels, Sierra Club
David Levitus, Executive Director, LA Forward
Dean Toji, Jan Victor Andasan, and **Celia V. Andrade**, Co-Chairs, A3PCON Environmental Justice Committee
Derek Steele, Interim Executive Director, Social Justice Learning Institute
Dianna Cogen, CEO and Co-Founder, Plastic Pollution Coalition
Dorinda Moreno, Founder and Principal, Fuerza Mundial Global
Doug Bender, Member of Steering Committee, Indivisible South Bay LA
Dr. Catherine Garoupa White, Executive Director, Central Valley Air Quality Coalition
Eddie Martinez, Executive Director, Latino Equality Alliance
Elva Yañez, Senior Advisor, Parks, Land Use and the Built Environment; Prevention Institute
Eric Romann, STAND-LA Coalition
Fatima Malik, President, League of Women Voters of Los Angeles County
Fredric Evenson, Director, Ecological Rights Foundation
George Leddy, PhD Director, Sustainable Environment Institute LA Community College District
Gladys Delgadillo, Climate Organizer, Center for Biological Diversity
Graham Hamilton, Manager, Surfrider Foundation Los Angeles Chapter

Haley Ehlers, Associate Executive Director, Climate First: Replacing Oil and Gas
Hugo Garcia, Chairperson, El Sereno Organizing Committee
Irena H Varjabedian, CSAN
Irene Kao, Executive Director, Courage California
Jackie Nuñez, Founder, Climate Health Now
James M. Limbaugh, President, West Los Angeles College
Jamie McConnell, Deputy Director, Women's Voices for the Earth
Janet Gollery McKeithen, Minister, The Church in Ocean Park
Janette Robinson-Flint, Executive Director, Black Women for Wellness
Jasmin Vargas, Southern California Organizer, Food & Water Watch
Jennifer Ferrigno, Co-Director, National Network for Immigrant & Refugee Rights
Jennifer Krill, Executive Director, Earthworks
Jennifer Tanner, Founder, Indivisible California Green Team
Jerry Rivers, Environmental Scientist, North American Climate, Conservation and Environment
Jesse N Marquez, Executive Director, Coalition For A Safe Environment
Jessica Craven, Member, Los Angeles County Democratic Party AD51, Feminists in Action
Los Angeles
Jesus Alonso, Kern Community Organizer, Clean Water Action
Joanie Steinhaus, Gulf Program Director, Turtle Island Restoration Network
John Davis, Executive Director, The Rewilding Institute
Jorge Garcia, President, El Sereno Historical Society
Jorge Gutierrez, Executive Director, Familia: Trans Queer Liberation Movement
Judith Enck, President, Beyond Plastics
Julie Levine, Co-Chair, MLK Coalition of Greater Los Angeles: Topanga Peace Alliance
Julie Meltzer, Founder and Senior Advisor, Clockshop
Junior Sanchez, Organizer, SELA Chisme, SELA Chisme
Karen Reside, Secretary, Long Beach Gray Panthers
Karina Maher, MD, Climate Health Now
Katherine Pease, Director of Science and Policy, Heal The Bay
Kathi Cervantez, Co-Director of Community Transformation, Promesa Boyle Heights
Kathy Seal, Group Leader, Citizens Climate Lobby, LA West Chapter
Katie Bolin, RN, Alliance of Nurses for Healthy Environments
Kaya Allan Sugerman, Illegal Toxic Threats Program Director, Center for Environmental Health
Kerry Kriger, Executive Director, Save the Frogs!
Kobi Naseck, Coalition Coordinator, VISIÓN
Laura Deehan, State Director, Environment California
Laura Hickernell, State Manager, Mothers out Front - California
Laura Raymond, Director, Alliance for Community Transit - Los Angeles
Laura Velkei, Communications Director, Arts District Community Council LA

Lawrence Couch, Director, National Advocacy Center of the Sisters of the Good Shepherd
Luis Morales, Director of Community Engagement, CDTech
M. Ahmanise Sanati, Co-Founder, Westside Activists
Maegan Ortiz, Executive Director, Instituto de Educacion Popular del Sur de California
Mala Wingard, Normal Heights Indivisible
Margaret Meyncke, SoCal Broadband Leader, Great Old Broads for Wilderness
Martha Camacho Rodriguez, Director, Social Ecological Education LA
Maro Kakoussian, Climate Justice Organizing Manager, Physicians for Social Responsibility - Los Angeles
Marty Perimutter, Co-Leader, Indivisible Media City Burbank
Mason Funk, Executive Director, The Outwords Archive
Matt Krogh, US Oil & Gas Campaign Director, Stand Earth
Melanie Winter, Founder and Director, The River Project
Michael Schneider, Founder, Streets for All
Michael Stocker, Director, Ocean Conservation Research
Micheal Doshi, Director of Partnerships, Algalita
Micheal J. Painter, Coordinator, Californias for Western Wilderness
Michele Prichard, Senior Director for Strategic Initiatives, Liberty Hill
Nancy Buermeyer, Senior Policy Strategist, Breast Cancer Prevention Partners
Nancy Halpern Ibrahim, Executive Director, Esperanza Community Housing Corporation, Los Angeles
Natalie A Backman, Co-Founder and Owner, Sakti Rising
Nathan Taft, Senior SAFE Cities Campaigner, Stand Earth
Neena Mohan, Climate Justice Program, California Environmental Justice Alliance
Nicole Ghio, Senior Fossil Fuels Program Manager, Friends of the Earth
Nina Zvaleko, Co-Organizer, Converging Storms Action Network
Norayma Cabot, CEO, A Place Called Home
Omar R Cardenas, Organizing Director - Long Beach, Californians for Justice
Omonigho Oiyemhonlan, Associate Attorney, Earthjustice
Paulina Torres, Staff Attorney, Natural Resources Defense Council
Rachel Smith, Partnerships Lead, Sunrise Movement Los Angeles
Reginald Johnson, Founder, Willowbrook Inclusion Network
Reverend Louis Chase, Holman United Methodist Church
Richard Parks, President, Redeemer Community Partnership
Ruth Breech, Senior Campaigner, Rainforest Action Network
Ruth Richardson, Rooted in Resistance (Indivisible- Pasadena)
Sandy Emerson, Board President, Fossil Free California
Sarah Stewart, President, Animals Are Sentient Beings Inc.
Seng So, Los Angeles Lead Organizer, Asian Pacific Environmental Network
Shannon Smith, Executive Director, FracTracker Alliance

Shelley Silbert, Executive Director, Great Old Broads for Wilderness
Sherry Lear, Organizer, 350 South Bay Los Angeles
Sheryl O Warren- Carey Harris, Owner, New Genesis Enterprises
Shoshana Wechsler, Coordinator, Sunflower Alliance
Simon Aron, Hub Coordinator, Sunrise Movement LA Youth
Sonya Vasquez, Chief Operations Officer, Community Health Councils
Sylvia Betancourt, Program Manager, Long Beach Alliance for Children with Asthma
Tammy Membreno, Executive Director, Barrio Action Youth & Family Center
Taylor Thomas, Co-Executive Director, East Yard Communities for Environmental Justice
Teresa Bui, State Climate Policy Director, Pacific Environment
Teresa Kotturan, Main NGO Representative, Sisters of Charity Federation
Tori Kjer, Executive Director, Los Angeles Neighborhood Land Trust
Veronica Padilla, Executive Director, Pacoima Beautiful
Violeta Urbina, President, Comite Navideno
Wes Reutimann, Special Programs Director, Active San Gabriel Valley
Yvette Arellano, Director, Fenceline Watch







September 26, 2022

VIA ONLINE PORTAL

Los Angeles County Board of Supervisors

***Re: Comments on Proposed Oil Well Ordinance / Project No 2020-000246-(1-5)
Case No RPPL2020000624; Board of Supervisors Meeting September 27, 2022
Agenda Item No. 8***

Dear Supervisors:

This firm represents the California Independent Petroleum Association (CIPA). On CIPA's behalf, we submit the below comments on the County's proposed Oil Well Ordinance, Project No. PRJ2020-000246-(1-5) and Advance Planning Case No. RPPL2020000624-(1-5) (Ordinance). The Ordinance as agendized is preempted by state law; constitutes an unconstitutional taking of property and deprivation of vested rights; and is not supported by substantial evidence, exceeds the County's police power, and violates due process. Further, the County's environmental analysis of the Ordinance as proposed fails to consider significant environmental impacts and improperly relies on inapplicable exemptions to CEQA. The myriad material issues with both the Ordinance itself and the environmental review process make clear that the County is inappropriately rushing this process and should defer any approval of the Ordinance until these issues are fully addressed. We ask that these comments be made part of the record of proceedings regarding the Ordinance.

1. The Ordinance Conflicts with State Law; It Is Therefore Preempted.

The Ordinance is preempted by state law because the state legislature has expressed a clear intent to occupy the field in regard to the regulation of oil and gas operations. Under California law, "[a] county or city may make and enforce within its limits all local, police, sanitary, and other ordinances and regulations not in conflict with general laws." Cal. Const, art. XI, § 7. However, "[i]f otherwise valid local legislation conflicts with state law, it is preempted by such law and is void." *Sherwin-Williams Co. v. City of Los Angeles* (1993) 4 Cal.4th 893, 897, citing *Candid Enterprises, Inc. v. Grossmont Union High School Dist.* (1985) 39 Cal.3d 878, 885. Local legislation conflicts with state law where it "duplicates, contradicts, or enters an area fully occupied by general law, either expressly or by legislative implication." *Id.* Local legislation is "duplicative" when it is coextensive of state law. *Id.* And local law is contradictory where it obstructs or harms state law. *Id.* at 898. Finally, local legislation enters an area that is "fully occupied" by state law when the legislature expressly or impliedly manifested intent to occupy the area. *Id.*; see also *Candid Enterprises, Inc., supra*, 39 Cal.3d at 885.

Implied preemption exists where, *inter alia*, the subject matter of the local legislation has been (1) "so fully and completely covered by general law as to clearly indicate that it has become exclusively a matter of state concern;" or (2) "partially covered by general law couched in such terms as to indicate clearly that a paramount state concern will not tolerate further or additional local action." *Sherwin*, 4 Cal.4th at p. 898; *see also Morehart v. County of Santa Barbara* (1994) 7 Cal.4th 725; *N Cal. Psychiatric Soc'y v. City of Berkeley* (1986) 178 Cal.App.3d 90, 106-07 ("if the subject matter is one of general or statewide concern, the Legislature has paramount authority; and if the Legislature has enacted general legislation covering that matter, in whole or in part, there must be a presumption that the matter has been preempted"); *City of Santa Clara v. Von Raesfeld* (1970) 3 Cal.3d 239, 246 (where a subject is regional in scope or statewide in character, it is not a local or municipal affair). The regulatory processes in the Ordinance are preempted by state law. Consistent with its strong interest in oil and gas resources and its intent to maximize the "wise development of oil and gas resources," California has adopted numerous statutes and regulations that comprehensively regulate virtually all aspects of oil and gas operations, including in particular all downhole activities. *See e.g.*, Pub. Resources Code, § 3106(d). The state has vested complete authority in CalGEM to "supervise the drilling, operations, maintenance, and abandonment of wells so as to permit owners or operators of wells to utilize all methods and practices known to the oil industry for the purpose of increasing the ultimate recovery of underground hydrocarbons and which, in the opinion of the supervisor, are suitable for this purpose in each proposed case." Pub. Resources Code, § 3106(b).

Further expressing the explicit policy of the state, section 3106(b) provides:

To further the elimination of waste by increasing the recovery of underground hydrocarbons, ***it is hereby declared as a policy of this state that the grant in an oil and gas lease or contract to a lessee or operator of the right or power, in substance, to explore for and remove all hydrocarbons from any lands in the state*** ... is deemed to allow the lessee or contractor ... to do what a prudent operator using reasonable diligence would do ... including, but not limited to, the injection of air, gas, water, or other fluids into the productive strata, the application of pressure heat or other means for the reduction of viscosity of the hydrocarbons, the supplying of additional motive force, or the creating of enlarged or new channels for the underground movement of hydrocarbons into production wells, when these methods or processes employed have been approved by the supervisor.

Id. (emphasis added). Thus, the Ordinance is preempted.

2. Application of An Amortization Program is Improper Here Because Oil Resources Are Dissimilar From Other Real Property Investments and, In Any Event, the County's Application Is Flawed.

The Ordinance includes an amortization period, which is apparently intended to permit existing owners and operators to recoup some value from their property, thereby avoiding an unconstitutional taking. The amortization concept is based on the premise that a property owner must be given an opportunity to recoup its investment and be made whole. The application of the concept to oil fields does not achieve that purpose. The utility of an oil field depends on its productivity, which requires ongoing infrastructure investment. Amortization does not fully account for such investments and therefore does not facilitate actual recovery on oil field infrastructure investments. Instead, the application of an amortization program in the context of oil field operations amounts to a taking of property without just compensation.

Even if the proposed amortization program was appropriate for oil wells, the County's amortization program relies on fundamentally flawed and legally improper assumptions. The program assumes that all capital investments in oilfields within the County were made decades ago and returns on those investments have already been garnered. Not so. The nature of oil and gas operations requires constant, ongoing capital investment. Such investments have yet to be recouped. A government entity (City, County, or State) cannot determine that an oil and gas producer has achieved "an appropriate rate of return" on their investment given future development is an integral part of production operations. The valuation of a diminishing asset, such as an oil producing property, is far more complex than a straight-line depreciation and amortization of a fixed asset. Any "amortization period" that might be enacted would face significant and protracted legal challenges that would be very costly and time consuming for all parties involved.

3. The County Fails to Take Into Account Significant Environmental Impacts.

The County failed to consider the significant, unmitigated and unmitigable environmental impacts of the Ordinance in violation of the California Environmental Quality Act (CEQA). Specifically, the County failed to consider the increases in greenhouse gas (GHG) emissions that will result from Ordinance adoption. Reducing oil and gas production in California will result in an immediate, foreseeable increase in the importation of foreign oil. Importation of foreign oil results in increased GHG emissions from tanker ships carrying the oil and the oil itself, which is not climate compliant.¹ These significant impacts include, among other things, impacts to air quality, which are required to be analyzed under CEQA. For example, the increase in foreign oil shipped to California to replace oil that cannot be extracted under the Ordinance will result in an increase in the release of volatile organic compounds (VOCs) and nitrogen oxide (NOx)

¹ By contrast, oil produced in California is climate compliant—meaning that oil produced in the State is produced in compliance with some of the most rigorous GHG reduction programs in the world.

emissions from tanker ships (and, to a lesser extent, trucks) bringing this oil to California ports and refineries.

California produces only a fraction of the oil consumed by the State. Through the end of 2021 California produced an average of 358,000 barrels of oil per day, while consuming more than 1,400,000 barrels per day, requiring over 70% of California's oil to be imported. Since California is an "oil island", meaning that it does not have any pipelines that bring crude into the state, oil must be imported. The largest exporter of crude oil to California is Ecuador, followed by Saudi Arabia and Iraq (65% total from these three countries). In addition, California imported 18,000,000 barrels of crude from Russia in 2021. There are significant impacts associated with these importation activities a, which the County failed to consider.

Moreover, such a failure to evaluate material environmental impacts would certainly be grounds for a CEQA challenge if committed by a project sponsor from the oil and gas industry. It is hypocritical for the County to exempt this project from CEQA under one or more categorical exemptions, where the County has consistently required projects by the oil and gas industry to fully and faithfully undertake the highest level of CEQA review, culminating in preparation of Environmental Impact Reports (EIR). Given the significant environmental impacts of the Ordinance, including the foreseeable and material increase in GHG emissions, it is inappropriate for the County to approve the Ordinance under a categorical exemption and avoid conducting the type of in-depth environmental review routinely required of the industry.

4. The County's Reliance on Categorical Exemptions Is Improper Because the Exemptions Relied On Are Not Available and Because Exceptions Apply.

The County purports to comply with the environmental disclosure, evaluation, and mitigation mandates of CEQA in its adoption of the Ordinance by relying on three (3) categorical exemptions. Such reliance is improper. In deeming the Ordinance exempt from CEQA, the County failed to consider the significant, foreseeable impact the Ordinance would have on mineral resources. The County must undertake a legally adequate evaluation of the impacts to this CEQA resource class prior to adoption of the Ordinance.

Specifically, the County relies on exemptions for Existing Facilities (Class 1), Actions by Regulatory Agencies for the Protection of the Environment (Class 8), and the Common Sense exemption (15061(b)(3)). Reliance on these exemptions is improper. First, the Ordinance does not qualify for the Existing Facilities exemption. Contrary to the County's report, the Ordinance involves significant change to existing facilities, in that it would completely bar their operation in the near future. Therefore, use of this exemption is inappropriate. Second, the Ordinance does not qualify under the Protection of the Environment exemption, because it is an action taken by a local legislative body, not a regulatory agency, as required. Finally, the Ordinance is not exempt under the Common Sense exemption, because, contrary to the County's assertion, there is substantial evidence that there will be significant environmental impacts. As discussed above,

the Ordinance will result in the foreseeable and material increase in GHG emissions, among other potential impacts.

In addition, CEQA recognizes any limitation on access to mineral resources of local, regional or statewide importance to be an environmental impact, *in and of itself*. Given that the Ordinance will necessarily result in limiting access to mineral resources of local, regional and statewide importance, it cannot be said that the Ordinance provide blanket “assurance” that the environment—which includes mineral resources—will be only protected, and not at all impacted. Petroleum and gas reserves in Los Angeles County constitute a “known mineral resource that would be of value to the region and the residents of the state” the loss of availability of which necessarily results in a significant environmental impact. State CEQA Guidelines, Appendix G, section XII(a). The County’s failure to consider or address these impacts requires additional review under CEQA, and makes the Ordinance ineligible for exemption under the Common Sense exemption.

Even if the County could reasonably show that the Class 8 exemption applied to the Ordinance—and, as discussed above, it cannot—the unusual circumstances exception of State CEQA Guidelines, section 15300.2, bars reliance on the Class 8 exemption, or any other categorical exemption found in State CEQA Guidelines, sections 15301 through 15333. The unusual circumstances exception is invoked when evidence shows that a project will have a significant impact on the environment. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105; *World Business Academy v. Cal. State Lands Commission* (2018) 24 Cal.App.5th 476, 499. Under this one-element test, if a project will have a significant environmental effect, that project necessarily presents unusual circumstances and cannot be found exempt from environmental review. *World Business Academy, supra*, at 499. Here, it is clear that the Ordinance will result in a significant impact on the environment. State CEQA Guidelines, Appendix G, section XII(a) defines projects that 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” as resulting in a significant environmental impact to mineral resources. State CEQA Guidelines, Appendix G, section XII(b) similarly defines projects that result in “the loss of availability of a locally-important mineral resource recovery site delineated on a local general, specific plan or other land use plan” as resulting in a significant environmental impact to mineral resources. Under both of these thresholds, the Ordinance will result in a significant environmental impact. Given the foregoing, there is no evidence supporting the County’s conclusion that the Ordinance would not have a significant adverse environmental effect, and in fact significant evidence to the contrary.

Moreover, the Ordinance is not exempt because application of the claimed exemptions are barred under CEQA Guidelines sections 15061(b)(2) and 15300.2. The exception for cumulative impact, 15300.2(b), applies in this case, because (as noted above) there will be significant cumulative impacts arising from the foreseeable and unavoidable closure of facilities

under the Ordinance. In addition, the Ordinance may not be exempt under other exceptions that may apply.

Finally, the County fails to provide sufficient evidence for its assertions. Despite an agency's factual determination that a project qualifies for a CEQA exemption, such claims will only be upheld if supported by substantial evidence. *Fairbank v. City of Mill Valley* (1999) 75 Cal. App. 4th 1243, 1251; *Citizens for Environmental Responsibility v. State ex rel 14th Dist. Agric. Ass'n* (2014) 224 Cal. App. 4th 1542, 1555; *North Coast Rivers Alliance v. Westlands Water Dist.* (2014) 227 Cal. App. 4th 832, 852. The Ordinance fails to provide necessary evidence to qualify for a CEQA exemption. Instead, the County only provides conclusory statements regarding potential impacts, which are insufficient to support the exemptions claimed.

5. The Ordinance Is an Unconstitutional Taking of Private Property.

The Ordinance represents an unconstitutional and unlawful taking of private property without just compensation, in contravention of the United States and California Constitutions. The state and federal Constitutions prohibit government from taking private property for public use without just compensation. Cal. Const., art. I, § 19; U.S. Const., 5th Amend.; *Chicago, Burlington & N. v. Chicago* (1897) 166 U.S. 226, 239 (applying the federal takings clause to the states). In *Penna. Coal Co. v. Mahon* (1922) 260 U.S. 393, 415 (*Penna. Coal*), the United States Supreme Court recognized that a regulation of property that “goes too far” may effect a taking of that property. When a regulation does not result in a physical invasion and does not deprive the property owner of all economic use of the property, a reviewing court must evaluate the regulation in light of the “factors” the high court discussed in *Penn Central Transp. Co. v. New York City* and subsequent cases. *Penn Central* emphasized three factors in particular: (1) “[t]he economic impact of the regulation on the claimant”; (2) “the extent to which the regulation has interfered with distinct investment-backed expectations”; and (3) “the character of the governmental action.” *Penn Central Transp. Co. v. New York City* (1978) 438 U.S. 104, 124. Subsequent cases, as well as a close reading of *Penn Central*, indicate other relevant factors such as whether the regulation affects the existing or traditional use of the property and thus interferes with the property owner’s “primary expectation” (*id.* at 125, 136), and whether the regulation “permit[s] the property owner] . . . to profit [and] . . . to obtain a ‘reasonable return’ on . . . investment.” *Id.* at 136. Under these factors, regulations which significantly limit the uses of private property constitute a taking. Such changes require just compensation, as well as due process and public consultation. This is true, for example, of zoning ordinances which render an existing use nonconforming.

In addition, the United States Supreme Court has definitively established that a land use regulation “goes too far”—amounting to a facial taking of property—where it “denies an owner economically viable use of his land.” *Lucas v. SC Coastal Council* (1992) 505 U.S. 1003, 1016, citing *Agins v. City of Tiburon* (1980) 447 U.S. 255, 260. This occurs where a regulation, by implementation alone, leaves the property owner without “substantial economic use” of the

affected property. *See Maritrans Inc. v. U.S.* (2003) 342 F.3d 1344, 1351-52. A facial taking analysis does not require a fact-based probe as set forth in *Penn Central*. Rather, the dispositive inquiry is "whether the mere enactment of the [regulation] constitutes a taking." *Agins*, 447 U.S. at 295, *abrogated on other grounds*; *see also Tahoe-Sierra Pres. Council, Inc. v. Tahoe Reg'l Planning Agency* (2002) 535 U.S. 302, 318.

The Ordinance would give rise to a claim for just compensation by oil well operators and owners as well as royalty holders. The Ordinance would severely restrict the ability of well operators, owners, and royalty holders to use their property and would materially infringe on their property rights and interests, up to and including completely eliminating the value of those rights. Therefore, the Ordinance constitutes a taking for which compensation must be made. The cost of such compensation could run into the hundreds of millions of dollars, if not greater.

6. The Ordinance Violates Owners' Vested Rights.

The Ordinance constitutes a violation of the vested rights of oil well operators, owners, and royalty holders. Under *Avco Community Developers, Inc. v. South Coast Regional Commission*, (1976) 17 Cal.3d 785 ("Avco"), where a permit holders make an investment in that permit, they possess vested legal rights. Subsequent case law has clearly concluded that the doctrine of vested rights applies to use permits and the activities authorized thereunder. *See Hansen Brothers Enterprises v. Board of Supervisors*, (1996) 12 Cal.4th 533 ("Hansen"). Post-*Avco* decisions have held that use permits confer vested rights. *HPT IHG-2 Properties Tr. v. City of Anaheim* (2015) 243 Cal. App. 4th 188, 199 (where a CUP has been issued and the landowner has relied on it to its detriment, the landowner has a vested right.); *see also Malibu Mountains Recreation, Inc. v. County of Los Angeles* (1998) 67 Cal.App.4th 359, 367. The scope of the vested rights is the scope of activity authorized under the permit. *Santa Monica Pines, Ltd. v. Rent Control Bd.* (1984) 35Cal.3d 858, 865. Here, the Ordinance will unlawfully curtail the vested rights related to the oil wells at issue.

7. The Ordinance is Not Supported by Evidence, Exceeds the County's Police Powers to Enact, and Its Adoption Violates the Substantive Due Process Rights of Owners.

The Ordinance is not supported by substantial or sufficient evidence, and therefore is arbitrary and capricious. The County has provided only a cursory staff report and amortization study. The County has not conducted – or at least not made public as lawfully required – its own health risk study or other analysis of the health and safety impacts of the Ordinance. This is insufficient to support the sweeping changes and infringements of property rights in the Ordinance.

In addition, the Ordinance exceeds the County's police powers. As noted above, the County is preempted by state law from implementing the Ordinance. While counties maintain the power to enact zoning and similar ordinances, they may not do so in arbitrary fashion and without

providing a justification reasonably related to legitimate government objectives. *Pacific Palisades Assn. v. City of Huntington Beach* (1925) 196 Cal. 211; *Marblehead Land Co. v. City of Los Angeles* (1931) 47 F.2d 528.) The County attempts to justify the Ordinance by relying upon unproven and alleged environmental impacts from the impacted facilities. The County cannot arbitrarily prohibit activities that have taken place safely throughout California for at least 75 years without providing reasonable justification. Moreover, existing state laws adequately protect public health, safety, and the environment; therefore, the County's arbitrary prohibitions create serious costs without any concomitant benefits. In cases involving the prohibition of oil and gas operations, the California Supreme Court has long held that "it is elementary that the enjoyment of property cannot be interfered with or limited arbitrarily" and must be supported with reasonable, non-arbitrary justifications. *Pacific Palisades Assn.*, 196 Cal. at 216. In its current form, the Ordinance would arbitrarily prohibit safe oil and gas operations in the County without providing reasonable justification for doing so.

Finally, the County's adoption of the Ordinance as agendized for the September 27, 2022 Board of Supervisors meeting constitutes a violation of the substantive due process rights of oil well operators, owners, and royalty holders. Due process requires that all members of the public have a fair and meaningful opportunity to be heard. The County's release of relevant documents in this matter only shortly before the Brown Act deadline to do so, considering the voluminous and technical nature of the issue, deprives CIPA and its members of the ability to make fully informed comments. Here, the County is considering depriving property owners of their property rights. A higher level of due process is therefore required. The County should therefore postpone the consideration of the Ordinance.

* * *

We appreciate your time and attention to this matter. Given the significant and material defects in the Ordinance and the lack of any environmental review conducted to support the Ordinance, we strongly urge the County to discontinue its processing of the proposed Ordinance and decline to adopt the Ordinance.

Sincerely,



Sigrid R. Waggener

Cc: Supervisor Hilda L. Solis



Los Angeles County Board of Supervisors
September 26, 2022
Page 9

Supervisor Holly J. Mitchell
Supervisor Sheila Kuehl
Supervisor Janice Hahn
Supervisor Kathryn Barger
Bruce Durbin, Supervising Regional Planner, Los Angeles County
bdurbin@planning.lacounty.gov
Adrienne Ng, Regional Planner, Los Angeles County ang@planning.lacounty.gov
ordinance@planning.lacounty.gov
Rock Zierman, California Independent Petroleum Association (via email)

401664435.8