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- **“Initial Submissions”**: Compliant submissions received no later than by end of day Monday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report, will be appended at the end of the Staff Report. The Staff Report is linked to the case number on the specific meeting agenda.
- **“Secondary Submissions”**: Submissions received after the Initial Submission deadline up to 48-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
- **“Day of Hearing Submissions”**: Submissions after the Secondary Submission deadline up to and including the day of the Commission meeting will be uploaded to this file within two business days after the Commission meeting.

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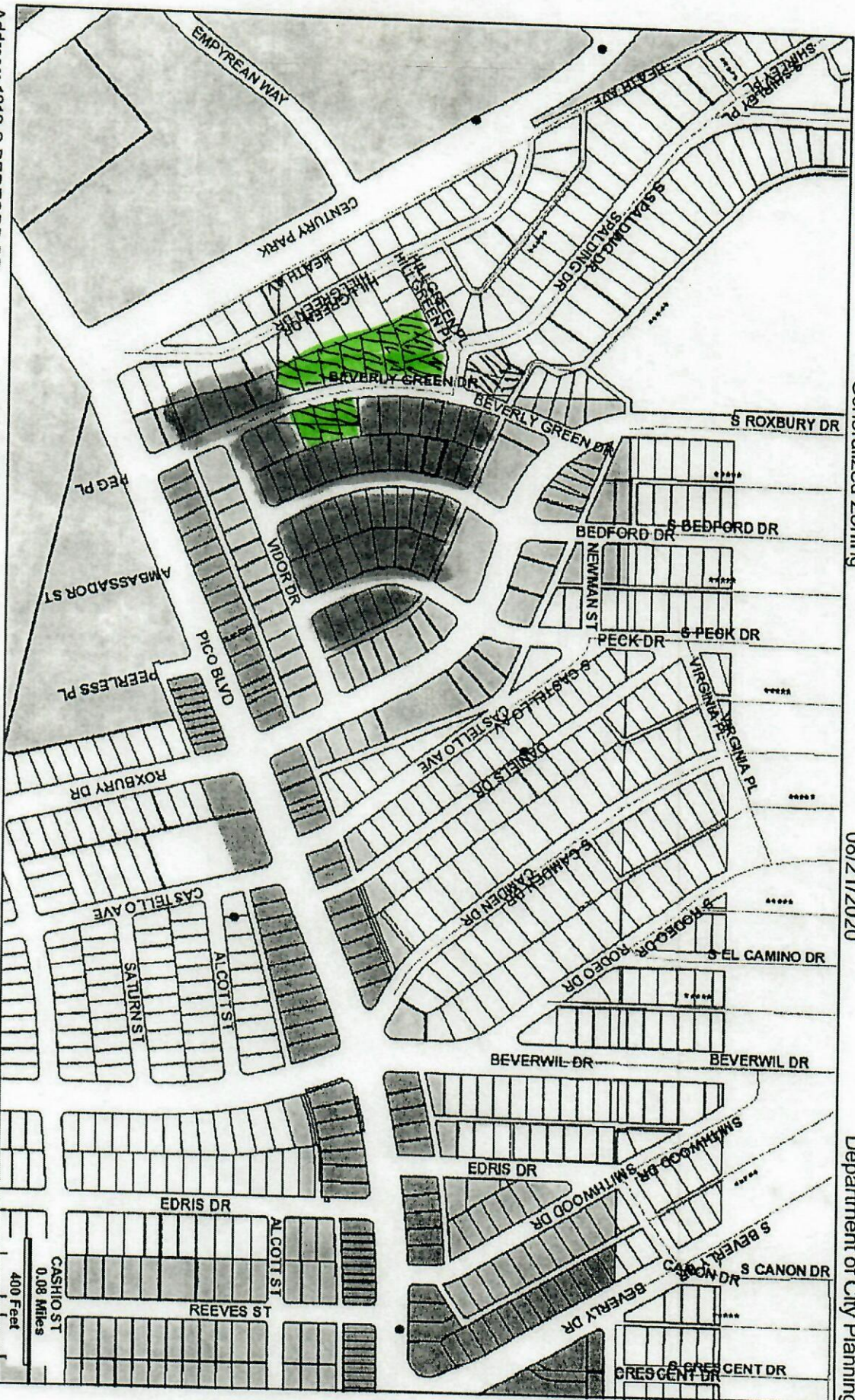
SECONDARY SUBMISSIONS

BEVERLY ANGELES AREA MAP

(North of Pico, East of Beverly Green, South and West of Roxbury Drive)

EXHIBIT "A"

City of Los Angeles
Department of City Planning



Zoning: R1-1-O
General Plan: Low Residential



BEDFORD RESIDENCES

North of Pico, East of Beverly Green, South and West of Roxbury Drive

(Beverly-Angeles Area)









Avia Rosen
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Los Angeles, CA 90035
aviarosen@gmail.com
310-916-1277

City Planning Commission
Los Angeles City Hall
200 North Spring St
Los Angeles, CA 90012

Regarding: Adoption of R1V2 zoning for Beverly Angeles Neighborhood
Case # CPC-2025-5011-ZC-HD

Dear Commissioners,

This letter is written on behalf of 37 residents of the Beverly-Angeles neighborhood who support the R1V2 zoning. The neighborhood is bounded by Pico Blvd on the South, Roxbury Drive on the east and north, and Beverly Green on the west (see attached Exhibit A of the map of our neighborhood). Our neighborhood is adjacent to Century City on our east side.

1. **R1V2 Zoning is consistent with massing and scaling of our neighborhood.** R1V2 zoning would be substantially consistent with the mass and scale of our neighborhood. The neighborhood is composed of substantially two-story homes that define the scale and character of our neighborhood. (See attached Exhibit B of pictures of the neighborhood homes) For example, our neighbor to our immediate north has a .54 FAR and our neighbor to our immediate south has a .96 FAR. Surrounding the perimeter of our neighborhood are 3 or 4-story condominiums or apartments.

2. **Substantial neighborhood support.** We have collected approximately 30 signatures from households in a neighborhood of about 44 single-family homes in support of the R1V2 zone. Some of these signatures were collected by both myself and members of the Los Angeles City Planning Department.
3. **Immediately adjacent homes in Beverly Hills can substantially exceed .45 FAR.** The Beverly-Angeles neighborhood is immediately adjacent on the west to Beverly Hills single-family houses. Adjoining single-family residences in Beverly Hills have a zoning that would allow a home to have 1,500 square feet plus 40% of the lot size. This would yield a house on a 5,000 square foot lot in Beverly Hills, adjacent to our neighborhood, of 3,500 square feet, which would yield a .70 FAR on a 5,000 square foot BH lot. However, a 5,000 square foot lot in our neighborhood with a .45 FAR would yield a total of only 2,250 square feet. However, a .55 FAR under R1V2 would allow homes in our neighborhood with a 5,000 square feet lot to increase the zoning to a total of 2,750 square feet.
4. **Compelling need for more family home living space.** Families like ours have 3 small bedrooms with no separate dining area. The .45 FAR does not allow for sufficient space to accommodate a more functional and gracious home. We are in need of more closet space, a separate eating area, a home office, a media area or room for family socialization, a location for fitness equipment, and a separate bedroom for our third child. The extra 500 square feet permitted under R1V2 would allow us to enjoy our home and neighborhood in a less cramped way without having to move neighborhoods and local schools. Under the present circumstances, we are told that it would not be economical to add a second story to our home, requiring new foundations, without the additional 500 square feet.

Thank you for considering our comments.

Sincerely,

Avia Rosen



CASE: CPC-2025-5011-ZC-HD; DATE OF HEARING: December 11, 2025; Time: 8:30 AM; ITEM #6

Kevin Stromsborg <Kevin.Stromsborg@ketteng.com>

Sun, Dec 7, 2025 at 4:28 PM

To: "cpc@lacity.org" <cpc@lacity.org>

City Planning Commission,

I am writing in support of the adoption of R1V2 zoning for our neighborhood. I live with my wife and our two children in a house across the street from where my mother and aunt were raised. My grandparents occupied the home across the street until they passed away in 2011. As a family, we have been residents of the Century Glen community for 70 years.

When my wife and I first moved into our home in 2006, it suited our needs well as newlyweds. Now, as the parents of teenage daughters and the children of aging parents, we would greatly benefit from the ability to add more square footage to our current home. Under the current zoning restrictions, this is not possible. R1V2 zoning is a reasonable and sensible solution to maintaining the character of the neighborhood while allowing homeowners like me and my family, the additional FAR they need to add the space to their homes to accommodate growing families, work-from-home lifestyles, and aging parents.

SB79 is a threat to our single-family home neighborhood. The adoption of R1V2 could help protect our neighborhood by allowing current and future homeowners the additional square footage they need so that they aren't forced to move out of the neighborhood resulting in the potential sale to developers of apartments, which could destroy the quality of life for homeowners in Century Glen.

Thank you,

Kevin

Kevin Stromsborg

KETT engineering
corporation

President | CEO

o: 818.908.5388 x246 | c: 818.519.1383 | f: 818.908.5323

Kevin.Stromsborg@ketteng.com | www.ketteng.com

JOIN OUR TALENT NETWORK

We make safety our #1 priority.

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RONALD D. ROSEN
10313 La Grange Avenue
Los Angeles, CA 90025
Email: ron@rlaw.pro

December 7, 2025

CITY PLANNING COMMISSION
Los Angeles City Hall
200 N. Spring Street, Room 667
Los Angeles, CA 90012

Via Email: cpc@lacity.org

RE: Adoption of R1V2 Zoning For Century Glen Homeowner's Association
Neighborhood
CASE #: CPC-2025-5011-ZC-HD

Dear City Planning Commissioners:

I want to offer my support for the adoption of the R1V2 Zoning for our
Neighborhood.

A.
SUBSTANTIAL PUBLIC SUPPORT FOR R1V2 ZONING

The Century Glen HOA area is bounded by Santa Monica Blvd. on the North, Pico Blvd. on the South, Century Park West on the East, and Beverly Glen on the West. (See Exhibit "A" Map of HOA Neighborhood) We are immediately adjacent to the Century City Shopping Center and the Fox Studio on the east side of our Neighborhood.

Over the past 5 years, the Century Glen HOA and some of its residents have actively supported and received substantial public support for the adoption of the R1V2 zoning for its Neighborhood as shown by the below actions:

1. COUNCILMAN KORETZ INTRODUCED MOTION TO INSTRUCT THE PLANNING DEPARTMENT TO PREPARE ORDINANCE FOR R1V2 ZONING FOR OUR AREA.

Councilman Koretz Introduced a Motion to the City Council dated January 15, 2019, to instruct the Planning Department to prepare and present an ordinance to rezone the Century Glen neighborhood to R1V2. The Motion recites that prior to the introduction of the Motion, "neighborhood residents submitted letters of support and signatures advocating for the R1-V2 zone." (A copy of the Motion is attached hereto as Exhibit "B")

2. FIRST RESOLUTION OF BOARD OF DIRECTORS OF THE CENTURY GLEN HOMEOWNERS ASSOCIATION OF OCTOBER 1, 2020.

After public meeting of the HOA discussing the R1V2 zoning, the HOA adopted a resolution dated October 1, 2020, endorsing the adoption of the R1V2 zoning. The Resolution stated that the R1V2 designation was "consistent with the scale and context of its neighborhoods." A copy of the HOA Resolution is attached hereto as Exhibit C.

3. DRAFT WESTSIDE COMMUNITY PLAN SUPPORTED R1V2 ZONING.

The first draft updated to the Planning Department's West Los Angeles "Residential Draft Concepts" strongly supported the adoption of the R1V2 zoning for our HOA. The Draft stated "Support the R1V2 Low Residential rezone for all of the Century Glen Neighborhoods." It went on to state that it thought "Build larger homes as per appropriate design standards, being consistent with the scale and context of the neighborhoods." This was also the result of substantial public advocacy for such rezoning. A copy of the Draft Concepts dated April 20, 2021, is attached hereto as Exhibit D.

4. CURRENT RESOLUTION OF BOARD OF DIRECTORS OF THE CENTURY GLEN HOMEOWNERS ASSOCIATION OF AUGUST 20, 2025.

At its meeting held on August 12, 2025, after notice to all of the members of the HOA that there would be a discussion of the R1V2 zoning, the Board voted, after "a full discussion of the issues and questions, to "recommend the approval of the R1V2 zoning for the R1 lots in the Century Glen Homeowners area." A copy of this Resolution is attached hereto as Exhibit E.

B.

THE IMPACTS ON THE SCALE AND MASSING OF RESIDENTIAL PROJECTS ON R1 LOTS IN THE HOA NEIGHBORHOOD WILL BE SUBSTANTIALLY AND ADVERSELY AFFECTED BY SB79

1. As I understand it, the massing, 7-8 story height, and large floor area ratios will far exceed the existing and proposed building standards under R1V2 zoning.

2. The modest amount of increase in FAR from adoption of R1V2 zoning will likely make such increase in single family homes by SB 79 seem very un-noticeable. What will be out of character and scale will be the SB 79 housing complexes.

C.

THE USE OF THE R1V2 ZONE WOULD ALLOW A MODEST INCREASE IN HOME SIZES WITHOUT DISTURBING THE SCALE AND CHARACTER OF THE HOA AREA

Adopting the R1V2 zoning would not adversely impact the scale and character of our neighborhoods where there already exists two story homes that exceed .50 FAR up to .60 FAR. [See Exhibit "F") for pictures of homes in the Century Glen area]. Significantly, by adopting the R1V2 zoning, it would allow, for example, for an average

lot size of 6300 square feet to have only about 500 additional square feet of space. This zoning plus any unused FAR would be enough to allow for a little more gracious dimensions to every room including the kitchen and bathrooms, and to add, for example, another bedroom, a home office, a family or media room, or a recreational-gym area. This can easily be done within the context of the exiting development standards applicable to single family homes.

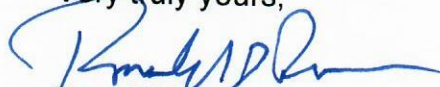
D.

Conclusion

Our homeowners are residents who take great pride in the character of their neighborhood where homes have been constructed that exceed the .45 FAR without adversely affecting the residential character and experience. Large or small, the homes are well designed, landscaped and maintained that adds to our appreciation of our neighborhood. These are homes that have mostly been occupied by young families as they move through the different stages of their space needs.

Our HOA area occupies a unique location adjacent to the commercial area of Century City and close to Beverly Hills and Westwood where our residents can be close to their work. Our homeowners have purchased or built homes close to their work as their "tailored sanctuary" without having to move miles out of the area that could offer the same homes but with unreasonable commutes to and from work. They would like to stay in the HOA area because of its location and character. Recommendation by the Planning Commission of the R1V2 zone will help achieve those goals.

Very truly yours,



Ronald D. Rosen
10313 La Grange Avenue
Los Angeles, CA 90025

cc: Councilwoman Yaroslavsky

EXHIBITS
to
Letter of Letter of December 7, 2025 by Ronald D. Rosen

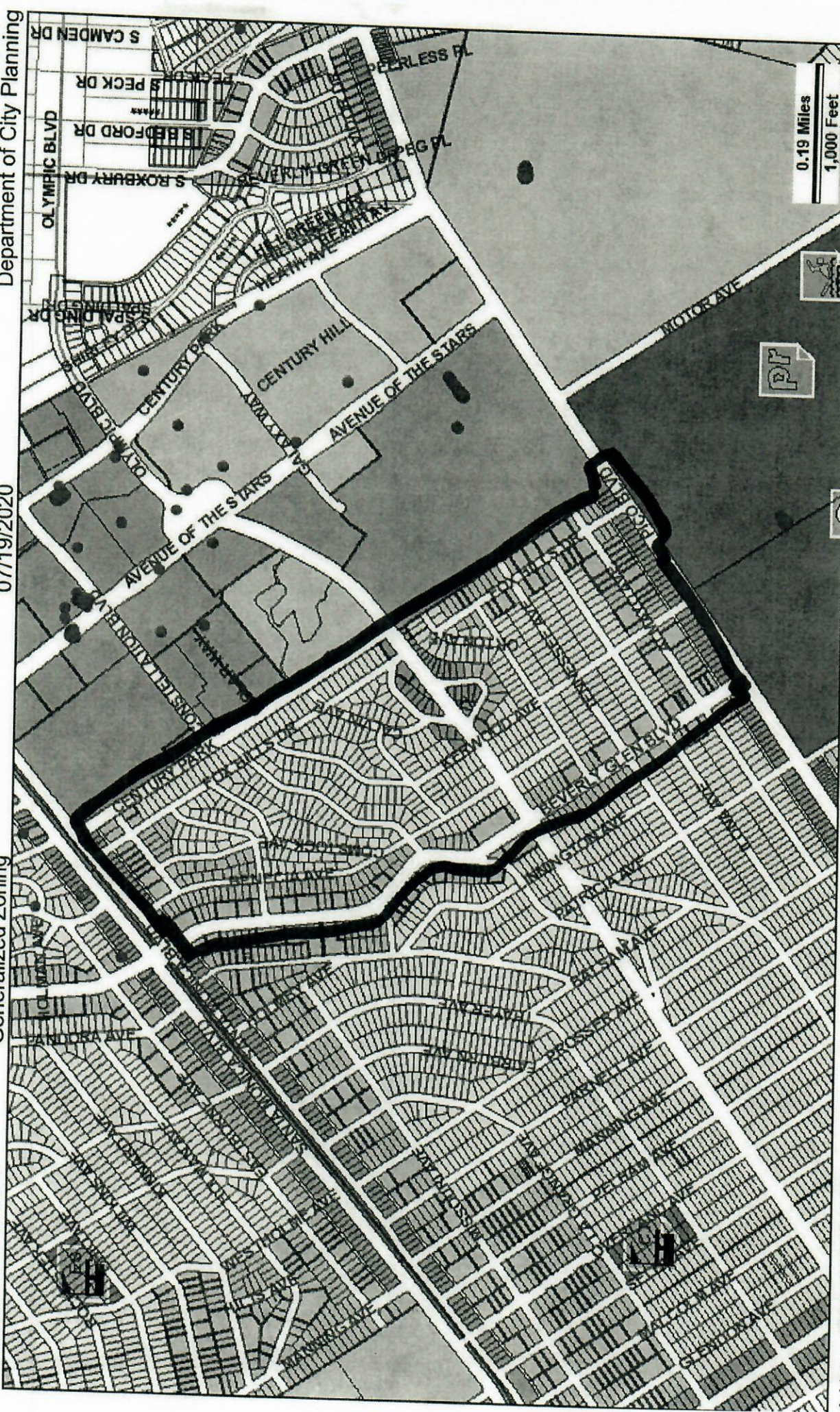
- A Century Glen Area Map
- B Motion of Councilman Paul Koretz dated January 15, 2019
- C First Century Glen Board Resolution of October 1, 2020
- D 2021 Planning Department Draft Concepts Update to West LA Community Plan,
dated April, 2021
- E Current Century Glen HOA Board Resolution of August 20, 2025
- F. Pictures of Residences Depicting the Scale and Massing of Homes

EXHIBITS
to
Letter of Letter of December 7, 2025 by Ronald D. Rosen

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- F. Pictures of Residences Depicting the Scale and Massing of Homes

Exhibit A

Century Glen HOA Map



Address: 9500 W PICO BLVD

APN: 4306002023

PIN #: 132A167 238

Tract: TR 7671

Block: None

Lot: 10

Arb: None

Zoning: C4-1VL-O

General Plan: Neighborhood Commercial



Exhibit B

Motion of Councilman Paul Koretz

MOTION **PLANNING & LAND USE MANAGEMENT**

Single Family zoning within Council District Five has been hard hit by the demolition of existing homes to build large homes that maximize the allowable floor area. As a result of this trend, and in response to constituent outcry, a large portion of the Council District 5 was included in the "Lower CD 5" boundary under Interim Control Ordinance (ICO) of 2016 (Council File No. 16-1470), which halted all building permits of single family homes until a zone change could be implemented.

The application of the revised Baseline Mansionization Ordinance (Council File No. 14-0656) and R1 zoning replaced most of the Lower CD 5 boundary under that ICO, which has a set time limit per the State's regulation. The resulting R1 zoning limits the residential floor area to 45% of the lot area. Simultaneously, subsets of the Lower CD 5 geography were given the option to pursue variations of the R1 zone that would modify the allowable floor area from that 45% requirement, these are known as the R1 Variation zones.

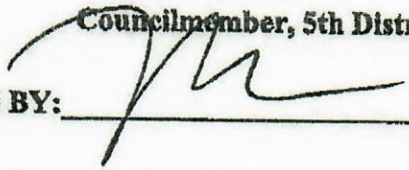
During the time-sensitive ICO process, some Century Glen neighborhood residents submitted letters of support and signatures advocating for the R1-V2 Zone, which allows houses larger than the standard R1 Zone. For that reason, this motion is put forth in order for residents to consider this zone change in a transparent public process.

I THEREFORE MOVE that the Council instruct the Planning Department to prepare and present an Ordinance to rezone the Century Glen neighborhood which is bounded by Santa Monica Boulevard; Century Park West; Pico Boulevard; and Beverly Glen Boulevard; to the R1-V2 Zone (Single Family Variation Zone), as was done for various other neighborhoods (Council File No. 16-1470).

PRESENTED BY: 

PAUL KORETZ

Councilmember, 5th District

SECONDED BY: 

JAN 1 2019

JAN 15 2019

ORIGINAL



Exhibit C

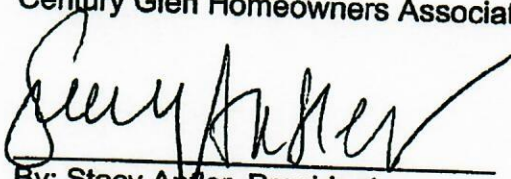
First Century Glen Board Resolution

**RESOLUTION OF BOARD OF DIRECTORS OF
CENTURY GLEN HOMEOWNERS' ASSOCIATION**

At a meeting of the Board of Directors of the Century Glen Homeowners' Association held on October 1, 2020, the Board of Directors unanimously endorsed the Low Scale Residential designation as set forth in the draft West Los Angeles Community Plan to protect and preserve the quality and character of its neighborhoods. The Board of Directors further unanimously supported the adoption of the R1V2 zoning designation for its area as being consistent with the scale and context of its neighborhoods, subject to the development standards as set forth in the letter to the Planning Department by Ronald D. Rosen dated August 19, 2020, a copy of which follows this Resolution. The Board of Directors also agreed not to support the proposed zone change requested on Bellwood Avenue from R3 to commercial.

Dated: October 1, 2020

Century Glen Homeowners Association



By: Stacy Antler, President

Exhibit D

2021 Planning Department Draft Concepts

RESIDENTIAL DRAFT CONCEPTS

CONCEPT: LOW RESIDENTIAL-SCALE

Location: Century-Glen Neighborhood, Rancho Park Neighborhood



Low Residential

OPPORTUNITIES AND CONSIDERATIONS

Preserve low-scale neighborhoods. The proposal allows for increases in home sizes within the context and scale of existing neighborhoods.

There is a need for more housing to address housing affordability.

Support the preservation of the existing scale of the neighborhood.

Century City could be rezoned to include multi-unit residential, including the neighborhood bounded by Pico to the south and Beverly Glen to the west.

Support the R1V2 Low Residential rezone for all of the Century Glen Neighborhoods.

Build larger homes as per appropriate design standards, being consistent with the scale and context of the neighborhoods.

The boundaries for the Low Residential concept should be extended to include the portion of the Century Glen neighborhood South of Olympic to Pico Boulevard.

Exhibit E

Current Century Glen HOA Board Resolution

RESOLUTION OF THE BOARD OF DIRECTORS OF THE CENTURY GLEN
HOMEOWNERS ASSOCIATION

* * *

The matter of the rezoning of the single family lots in the Century Glen Homeowners' area to R1V2 Variable-Mass Zone was considered at its meeting held on August 12, 2025. After a full discussion of the issues and questions by the Board members, the Board voted to recommend the approval of the R1V2 zoning for the R1 lots in the Century Glen Homeowners area as was also previously approved by the Board of the Association at its meeting on October 1, 2020.

Dated: August 20, 2025

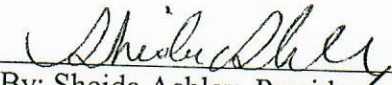

By: Sheida Ashley, President

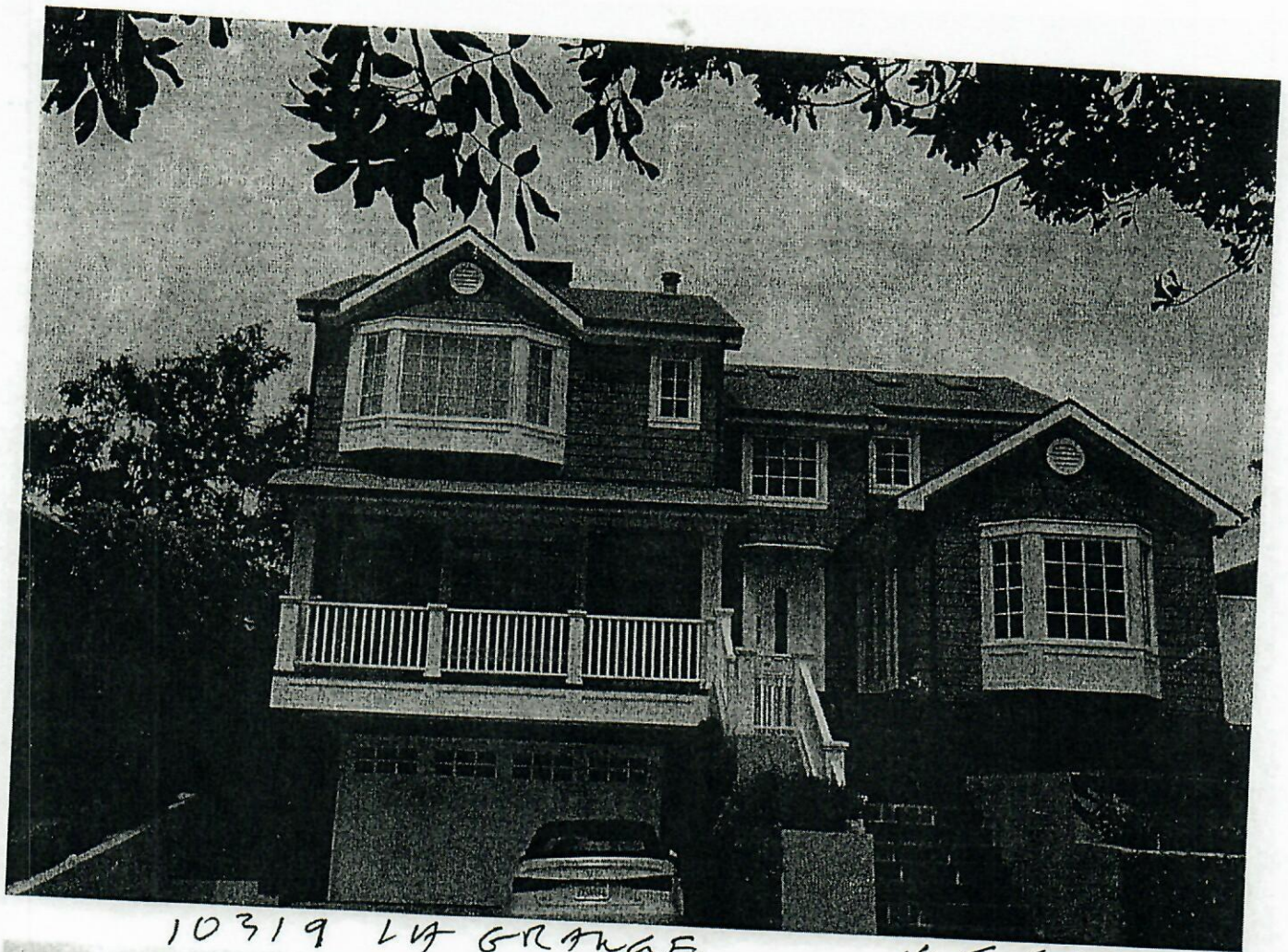
Exhibit F

Pictures of Residences Depicting the Scale and Massing of Homes









10319 LA GRANGE

165 FAR



10322 LA GRANGE

166 FAR



VIA EMAIL
CPC@LACITY.ORG

December 9, 2025

Hon. Commission President and Commissioners
c/o Commission Executive Assistant
City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

Re: Secondary Submittal of 2990 S. Sepulveda, LLC in Response to Proposed
Residential Project at 2930-2936 South Sepulveda Boulevard, Case Numbers
CPC-2024-5548-DB-PR-HCA and ENV-2024-5549-SE

Dear President Lawshe and Commissioners:

Nossaman LLP is land use counsel to 2990 S. Sepulveda, LLC, which owns the Mullikin Medical Center, located at 2990 South Sepulveda Boulevard, at the northeast corner of the intersection of South Sepulveda Boulevard and National Boulevard. We are writing on behalf of 2990 S. Sepulveda, LLC to, again, **object** to the City's proposed approval of Development Standard Waivers and Project Review for the residential project proposed at 2930-2936 South Sepulveda Boulevard ("Project"). The Project is not entitled to height waivers under state and local density bonus laws because the height waivers violate objective and readily verifiable City conditions of approval for telecommunications facilities at 2990 S. Sepulveda LLC and are preempted by federal law.

The Project proponent fails to rebut the technical report of CTC Media Group showing interference with wireless communication. Remarkably, the Project proponent also takes the position that the City's findings and conditions of approval for wireless infrastructure do not constitute objective, identified, written public health or safety standards. (Letter from Tedd Nelson to City Planning Commission, Dec. 1, 2025, at p. 5.) The City's findings and conditions of approval are readily verifiable, objective and enforceable. The Project proponent's argument is contrary to public policy and should be rejected by the Commission. The proceeding record supports the City's rejection of the height waivers.

The City should likewise deny the Project Design Review on the ground that the Project is incompatible with surrounding land uses.

ATTORNEYS AT LAW

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34th Floor
Los Angeles, CA 90017
T 213.612.7800

Elizabeth Klebaner
D 949.477.7682
lklebaner@nossaman.com

Admitted only in California

Refer To File # 505368-0001

I. THE PROJECT IS NOT ENTITLED TO WAIVERS OF HEIGHT STANDARDS BECAUSE IT WILL RESULT IN A SPECIFIC ADVERSE IMPACT UPON PUBLIC HEALTH AND SAFETY.

The Project proponent has **failed** to put forward **any** evidence rebutting the expert testimony of Mr. Lee Afflerbach PE, that the Project would cause wireless signal from the telecommunications facilities at 2990 S. Sepulveda Blvd. to fail the City's conditions of approval to provide the public and emergency service organizations with access to mobile telephone service within the community. (See, e.g. Case No. ZA 96-0686 (CUZ), Finding 1 ["the proposed location will be desirable to the public convenience or welfare The new cellular transmitting facility is necessary to upgrade service in the general areas to industry standards..."].) Mr. Afflerbach has shown that while today, "RF signals from the antennas on the northwest face of the Mullikin Center [] propagate northwest toward the I-405/I-10 interchange and freeway segments used by around a million vehicles/drivers each day," regardless of building material, a degradation of service can be expected if the Project is constructed. (Letter from Lee Afflerbach, dated May 13, 2025, pp. 2, 4-5.) Mr. Afflerbach has further shown that as a conservative estimate -- as the Project proponent has not disclosed its exact proposed building materials or methods -- the Project is likely to result in **at least** a 10-12 dB of degradation of the signal. (*Id.* at p. 5.) "This means that for every 10 watts of power transmitted through a building, it is reasonable to expect that only a maximum of only 1 watt of power will remain after the transit." (*Id.* at p. 5.) "Practically speaking, this means that by approving the Project as proposed, the City would prohibit the provision of wireless communication service throughout the heavily traveled I-10/I-405 intersection area." (Letter from Lee Afflerbach, Nov. 30, 2025.)

The technical analysis commissioned by the Project proponent and prepared by Mr. Rajkanwar Brar of Integer Telecom Services, Inc., dated July 25, 2025, does not address the reduction in signal strength shown by Mr. Afflerbach, but argues for the relocation of the telecommunication facilities at 2990 S. Sepulveda Blvd. (See Letter from Brar, July 25, 2025, at p. 1.) Mr. Brar's letter confirms that the Project would create radio signal-blocking area of sufficient magnitude to effectively block wireless coverage to a level that will make coverage unavailable to users. (Letter from Lee Afflerbach to Liz Klebaner, dated Dec. 8, 2025, at p. 4, attached as Attachment 1.)

Mr. Brar's suggestion that the Project proponent has "engaged" and "worked closely" with the carriers is contradicted by the proceeding record. (See Letter from Mr. Brar at p. 1.) The only wireless carrier that has participated in the instant proceeding **opposes** the Project. In particular, as documented by the August 5, 2025 submission from DISH Wireless, which is included at page 427 of the Recommendation Report, the Project's "height and massing will severely compromise wireless communications, including E-911, voice, messaging, and other services in-vehicles ... at the I-10/I-405 freeway intersection corridor."

Mr. Brar's assertion that trees planted along the western side yard of 2990 S. Sepulveda Blvd. currently preclude adequate wireless communication is specious. The nearby trees referenced by Mr. Brar are not at the elevation with any of the wireless carrier antennas; therefore, they have no impact on network performance. (Attachment 1, at p. 1.) Three out of four of the major nationwide carriers find it necessary to have their radio equipment and antenna systems operate from 2292 South Sepulveda Blvd. to augment their wireless networks in Los Angeles. (*Ibid.*) Mr. Brar's letter also does not address the delay in connectivity to emergency

and 911 communications experienced by wireless callers **attempting to access** FirstNet services as a result of signal attenuation caused by the Project.

II. THE PROJECT IS NOT ENTITLED TO WAIVERS OF HEIGHT STANDARDS ALSO BECAUSE THEY ARE PRECLUDED BY FEDERAL LAW.

The Project is not entitled to height waivers for the separate and independent reason that they violate federal law. (See Gov. Code, § 65589.5(d)(3); Los Angeles Municipal Code, § 12.22.A.37(d)(3)(i)(d).) Section 332 of the federal Telecommunications Act prohibits local land use agencies from adopting any regulation or taking any action that “prohibit[s] or ha[s] the effect of prohibiting the provision of personal wireless services.” (47 U.S.C. § 332(c)(7)(B)(i)(II); see also *APT Pittsburgh L.P. v. Penn Township Butler County* (3d Cir. 1999) 196 F.3d 469, 480; see also *Sprint Spectrum, L.P. v. Willoth* (2d Cir. 1999) 176 F.3d 630, 643.) The Project applicant fails entirely to address this authority. (See, generally, Letter from Tedd Nelson to City Planning Commission, Dec. 1, 2025.)

III. THE CITY CANNOT GRANT THE REQUESTED PROJECT REVIEW BECAUSE THE PROJECT IS INCOMPATIBLE WITH EXISTING DEVELOPMENT ON ADJACENT PROPERTIES.

In approving a Project Review, the City must find that a project “consists of building and structures ... **including height** ... that is or will be compatible with existing and future development on adjacent properties and neighboring properties.” (Los Angeles Municipal Code, § 13.B.2.4(E)(2), emphasis added.) The City cannot make that finding here. By approving the Project, the City would preclude uses the City has approved through multiple entitlements it granted to T-Mobile (which incorporates Sprint PCS), Verizon (formerly known as AirTouch), and DISH Wireless (incorporating Boost Network, part of Sprint PCS) (collectively, “Carriers”) for installation of telecommunications infrastructure at 2990 S. Sepulveda Blvd., such as the following:

Entitlement	Date
Metro PCS	
Case No. ZA 90-1236 (CUZ) Conditional Use and Area Height Variance	April 4, 1991
T-Mobile	
Case No. ZA 96-0686 (CUZ) Conditional Use Permit	October 10, 1996
Case No. ZA 96-0686 (CUZ) Conditional Use Permit	March 6, 2009
Case No. ZA 96-0686 (CUZ) Approval of Plans	June 28, 2002
Verizon	
Case No. ZA 91-0204 (CUZ) Conditional Use Permit	May 10, 1991
Case No. ZA 91-0204 (CUZ) Approval of Plans	July 2, 1997

Case No. ZA 91-0204 (CUZ) (PAD) Approval of Plans

May 5, 1999

DISH Wireless

Case No. ZA 2001-5488 (CU) Conditional Use Permit

August 8, 2001

IV. CONCLUSION.

For the above reasons, we respectfully request the City Planning Commission to deny the Project as currently proposed.

Sincerely,



Liz Klebaner
Nossaman LLP

LK:LK

Attachments

cc: Jennifer Torres
Charles Turner
Kyle Winston

} via email w/attach

ATTACHMENT 1

December 8, 2025

Liz Klebaner
NOSSAMAN LLP
777 South Figueroa Street, 34th Floor
Los Angeles, CA 90017

Reference: Response to Integer Report

Dear Ms. Klebaner:

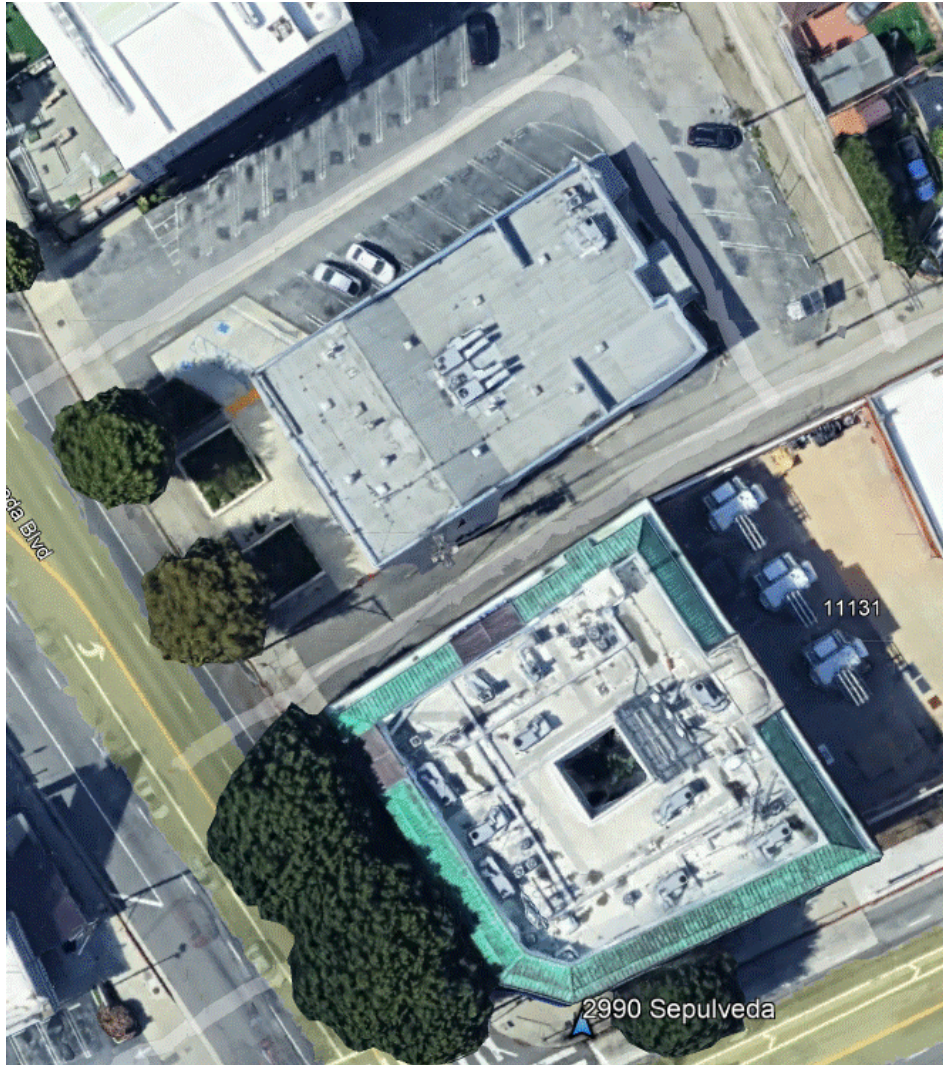
I wanted to comment on the Integer Report.

1. *"There are trees taller than the building along the west side of the building (along Sepulveda Ave. as shown below). The trees on the southern side also seem to be getting taller than the building. Unless trimmed, they should be blocking coverage from the site on both sides by now. Thus, current site should not be meeting the original coverage or capacity targets." (Page 1, paragraph 3)*

CTC Media Response:

The nearby trees referenced in the Integer report are not at the elevation with any of the wireless carrier antennas; therefore, they have no impact on network performance. All indications are that the wireless facilities are operating properly. The T-Mobile equipment (radios and antennas) have recently been upgraded for 5G service in late 2024 since the purchase of Sprint by T-Mobile. As additional proof of the desirability of this specific location and height of antennas on the roof for carriers, the DISH network had already planned on adding their equipment on the same roof; that would suggest that three out of four of the major nationwide carriers find it necessary to have their radio equipment and antenna systems operate from this location to augment their wireless networks in Los Angeles.

As for the Google Earth satellite photo the existing building at the 2990 S. Sepulveda cell site, the trees are on the west side (not the northern sector of interest) of the cell site building. The building owner of 2990 Sepulveda also had informed us that the two large trees have recently been trimmed by the city since the Google Earth photographs in the May 2024 photos presented by Integer.



2930 S. Sepulveda
Blvd North

2990 S. Sepulveda
Blvd North

Pruned Trees

2. *"Based on comparative coverage analyses, relocating the site to the proposed building or to a higher (than present) altitude would yield a substantial improvement in both coverage and capacity performance."*

(Page 1, paragraph 4)

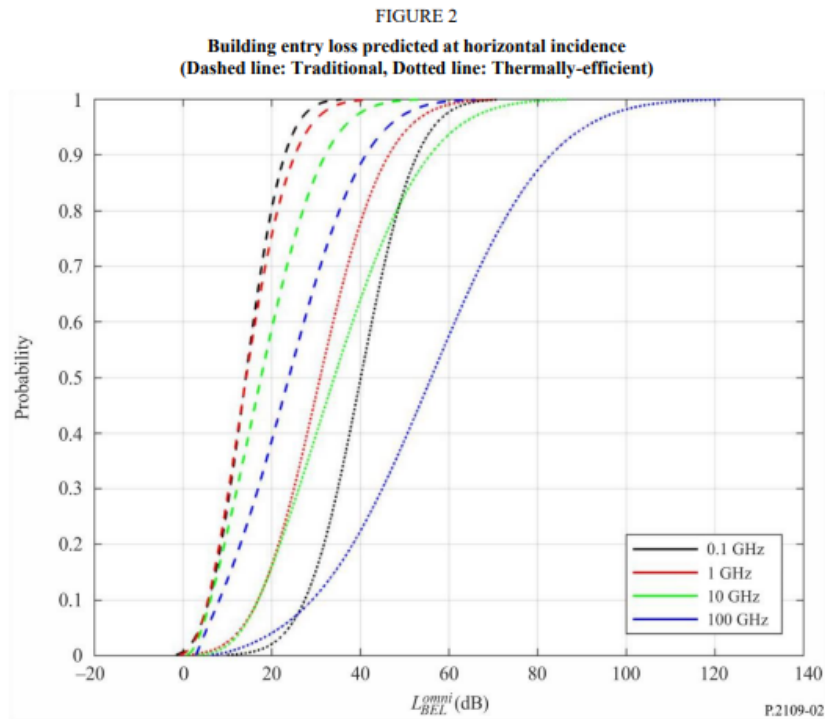
CTC Media Response:

CTC Media reviewed the project plans for the new building at 2930 Sepulveda Blvd. to determine whether the proposed new building would impact or alter the coverage of wireless services from the existing cell site configuration. Our focus was on determining whether there would be a significant reduction in coverage and overall transmission capacity for equipment operated by the tenant carriers. We employed the methodology outlined in ITU-R R.2109-2¹, which established a conservative loss of signal power attenuated as the energy travels from the existing cell antenna through the proposed building in a northwesterly direction. To clarify our earlier analysis of this proposed new building, depending on the construction methods and materials, there is a 50% chance or greater of the signal dropping in the direction of 2930 Sepulveda Blvd. by 10-12 dBs. See the dotted red line at 0.5 or 50% below – this is a conservative estimate based on limited available information. This is an estimate based on the middle of the road (i.e. 50% option). In a worst case scenario (100% or some sort of theoretical solid obstruction made of solid steel or lead), the red dotted line goes to 40 dB loss, which would absolutely preclude wireless communication. Decibels are a logarithmic scale which means that every 3 dBs direction is either a lessening of the attenuation of the signal (if moving closer to 0) or double the loss of the signal if negative (if greater)². All things being equal (50% - base on unknown construction) that the loss of signal due to the physical construction of this proposed building would knock down signal by at least 10-12 dBs. If it was built differently (by different materials and construction) such that a specific, particular architecture and use of materials would produce a 80% signal block such that it would drop the signal to 20 dBs lower, which would preclude wireless communication. Bottom line: even with very conservative estimates, which would be consistent with type 3 construction, signal transmission north of 2990 S. Sepulveda Blvd. for all carriers will be blocked by the proposed building.

¹ International Telecommunications Union, Geneva, Switzerland. See attached reports from the ITU for ***Terrestrial land mobile radiowave propagation in the VHF/UHF bands*** and ***Recommendation ITU-R P.2109-2 (08/2023) P Series: Radiowave propagation Prediction of building entry loss.***

² <https://betterexplained.com/articles/using-logs-in-the-real-world/> attached.

Rec. ITU-R P.2109-2



3. *The coverage snapshots illustrate the current performance and the projected impact of relocating the site to the proposed building at a higher elevation. To evaluate the potential changes, we compared the current site's performance using predictions for both coverage layer (Low Band, 700 MHz) and capacity layer (Mid Band, 1900 MHz), including standalone and aggregated coverage outputs. Equivalent simulations were then conducted with the site repositioned to the rooftop of the proposed structure. Additionally, coverage predictions were generated for a scenario in which the current site was decommissioned, isolating its contribution by removing it from the prediction model.* (Page 3, - paragraph 2)

CTC Media Response:

Integer's comments suggest that a macro cell site is being proposed at 2930 S. Sepulveda Blvd in order to maintain existing coverage.

If Integer maintains that trees are sufficient to block signal, Integer's letter confirms our findings that a proposed building would certainly create a radio signal-blocking area of

sufficient magnitude to effectively block wireless coverage to a level that will make coverage unavailable to users for the same reasons described above in Answer #2.

While the developer provided high-level floor-by-floor detail, no information or illustrations were included for the wireless equipment or generators. Integer's assertion that coverage would be enhanced or maintained by placing telecommunication equipment at 2930 S. Sepulveda Blvd. is therefore entirely unsupported.

Regarding the need to raise cellular antennas to a higher elevation, all indications are that the current site elevation at 2990 South Sepulveda meets the requirements of the existing carriers.

If you have any questions regarding our findings or require additional analysis, please get in touch with me.

Regards,

A handwritten signature in black ink, appearing to read "Lee Afflerbach", with a stylized, flowing script.

Lee Afflerbach, P.E.
Project Manager and Principal Engineer



Secondary Submission by Appellants

December 8, 2025

TO: City Planning Commission
200 N. Spring Street, City Hall Room 314
Los Angeles, Calif. 90012

Via email cpc@lacity.org
Cc: Cecilia Lamas

FROM: Appellants, West Adams Heritage Association, Jim Robinson, Sara Velas

Re: RE: 1015 w 21 Street DIR-2025-0688-BSA-1A
Appeal of Demolition No.24019-10000-02156

Honorable Commissioners,

University Park is a special place. The City has recognized its unique character by three HPOZs and over three dozen monuments. The state and federal government recognized this with four National Register Districts. CRA recognized it and surveyed the area extensively with SHPO concurrence.

Twice a month a highly qualified HPOZ Board guides developers and homeowners in the exterior changes to their properties so that the character-defining features of the zone remain and are protected and enhanced meeting the goals of the HPOZ Ordinance and the University Park Preservation Plan. As the Ordinance states as a goal; *Develop and maintain the appropriate settings and environment to preserve these buildings, structures, Landscaping, Natural Features, and areas.* The City failed in its expressed goal at 1015 w. 21st Street.

If you see page 7 of the Staff report. (the infill that this demolition permit allowed to happen), it is a boxy non-descript building that ought to have been better. All of the protections in place failed. How did this happen? University Park deserves better than this –

First, the City was misled by the developer when he applied for the demolition permit on May 31, 2024 which is the subject of the appeal today. He swore an affidavit that the demolition was not part of a larger project. See... of the staff report. .p 77

Yet the developer had already been before the HPOZ Board first with a second story addition and then again with a demolition and 6 unit 3 story project. His affidavit to the City is simply not based on facts.

Secondly the City erred (July 22, 2024) when the OHR staff provided LADBS with a misleading statement about the significance of the property. *“Demolition of the structure was found not to result in the loss of or serious damage to a significant historical or cultural asset pursuant to*

LAMC Sec. 91.106.4.5; therefore, additional review for the demolition is not required.” Staff should have known better. The significance of the property and the inadequacy of the existing survey is in the record in the HPOZ Board minutes. This staff evaluation flies in the face of the facts when the HPOZ Board had consultations with the developer and staff at three separate meetings (minutes which are in the record).

The City should have required a Board review of the demolition and then compliance with the residential rehabilitation guidelines of the University Park Preservation Plan (see page 18 and 19 of the Plan for structures from the period of significance.)

The City’s OHR staff should have been cognizant of the depth of issues on this and other sites. To use the NC (non-contributing) status as a certainty is in error. Staff was well aware of the defects in the survey. In 2007 the Hancock Park survey was found inadequate by the Superior Court because the survey used a “financial miracle” standard to assess designation. This triggered a revision of the Hancock Park survey. The University Park survey has the same flaw.

University Park deserved better and greater care. We agree with ZA Turner that: *“A plethora of issues have been presented in this appeal.”* We disagree *“but the most important issue is whether the proper protocols were followed in the issuance of the subject demolition permit.”* But we agree *“ Adding to the complexity of the issue, is the long, but compressed permit history of the site.”*

There **are** a plethora of issues. Protocols are not set in place to provide a check box that conspires with flawed history and overlooks the facts. The action is more egregious when they cite deference to protocols to support inaction: *“LADBS appropriately deferred to the Department of City Planning and followed correct protocols that they are required to follow. There was no reliance on their (LADBS) interpretation of the Code nor was there any error in the issuance of the demolition permit.”*

We disagree with this statement. The LADBS and the ZA ought not to have deferred to the Department of City Planning and used the excuse of “protocols” which are systematic and when they contradict facts. The facts here merit a different course of action. The demolition permit issued (24019-10000-021560 violates the University Park Preservation Plan, the HPOZ Ordinance, the City’s Demolition Ordinance, the processing requirements of the ED1 Mayor’s directive, the goals of the South Community Plan and splits the demolition permit from the larger project and should not be deemed ministerial.

The Zoning Administrator had the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City. While Protocols set an etiquette which in most instances does no harm, in this instance, they create blinders from what is fact. For this reason, and the facts noted in the appeal, the CPC should uphold the appeal and send the case back to the University Park HPOZ Board for review.

It Is impractical to require a redesign of the box. But there are positive steps that can be taken to make the impacted stakeholders whole.

1. Find the permit void because the facts of the case do not support its issuance
2. Direct the applicant to go to the HPOZ Board for a legitimate demolition permit and a CCMP (retroactively).

3. Direct the Planning Department to take steps to amend the HPOZ survey (as it did in Hancock Park.) One economical option is to continue with the process which began with the HPOZ Board review and a Subcommittee of experts which had already begun the update process.
4. Establish a grant fund to assist with the restoration of contributors and contributor-altered structures in the Zone (which may include those currently listed as non-contributors). This may seem far-fetched, but funds have been similarly made available in neighboring Adams Normandie and Pico Union HPOZs but would need tweaking to remove financial income caps in order assist all aggrieved stakeholders and property owners.

Such action would underscore the premise that facts do matter. University Park deserves no less.

Enabling this demolition and incompatible design, in addition to the misleading owner declaration and erroneous staff clearance, was that there was no public hearing on the approved project until the appellants filed a request for modification. While the appeals were pending, the developer continued to build. There was no forum for transparency in this development process. Had the HPOZ Board been given the opportunity to weigh in and review the demolition permit and a CCMP, there would have evolved a better project.

The CPC can sustain the appeal and take the recommended actions (1 through 4 above) which would make the aggrieved parties and stakeholders “whole” to the extent feasible yet not impact the development. It would also set standards for fact-based decision making which was missed here.

We also add by reference the case file for the ZA hearing DIR-2025-688-BSAApplicant: West Adams Heritage Association / Jean Frost Representative on April 22, 2025.

Sincerely,



Jean Frost for the West Adams Heritage Association and appellants Jim Robinson and Sara Velas

Attached: Chronology

Email from Appellant Jim Robinson

Letter from Appellant Sara Velas

May 15, 2025

TO: AZA Jordann Turner

RE: DIR-2025-0688-BSA

CHRONOLOGY 1015 W 21 Street

Circa 1905, the craftsman 1 story bungalow was built at 1015 W. 21st Street.

On August 8, 2000, by Ordinance #173455, the City approved the University Park HPOZ, adopted by the Council of the City of Los Angeles.

On July 14, 2005, the City adopts the University Park Preservation Plan “using preservation principles as a planning and management tool and stabilizing the community for future generations” and “provide Guidelines for both existing and new development.”

On May 9, 2007 the City Council directs the Planning Department to re-evaluate the environmental clearance and Historic Resources Survey for the adopted Hancock Park HPOZ due to the “economic miracle” premise of the earlier survey.¹

On June 21, 2011, the HPOZ Planning Committee reports on its survey of NCs with field notes; the Board adopts the survey and moves it forward to Planning. The survey updates are done in three parts, the first grouping being 1888-1900. The NC designations need updating due to the “economic miracle” criteria of the earlier survey.² 1015 W.21st Street is in group 2.

On April 25, 2017, Ordinance #184903, amends Section 12.20.3 of the Los Angeles Municipal Code to clarify HPOZ review procedures, add frequently used definitions, and outline procedures and fees for technical corrections to Historic Resources Surveys, and unpermitted demolition.

On June 21, 2021, OMG 1021 21st LLC purchased the SFD at 1015 w 21 from the Noone Family Trust; sale price \$960,000.

¹ As a result of the Court's decision regarding the standard used to determine the reversibility of an alteration, the City Planning Department re-examined the Survey comprised of 1,282 parcels. Instead of using an "economic miracle" standard, the Department of City Planning utilized the Secretary of Interior's National Register Bulletin

15 and the Standards for Rehabilitation, used by all professional historians and architectural historians undertaking historic resource surveys, to determine whether alterations were reversible.

² Of the twenty-one-listed Non-Contributor (NC) historic structures in GROUP-I, five are recommended to retain that same classification, one is recommended as a Contributing Structure (C), and fifteen are recommended to be listed as Contributing-Altered (CA).

Of the fifteen structures recommended for re-classification as CA, thirteen were initially faulted for the "stucco overcoat and window change-outs" criteria and two cited for front facade alterations (955 W .23rd. & 2361 Portland).

On August 24, 2021, OMG 1021 21st LLC secured a mortgage of \$624,000 from First Republic Bank for 1015 W 21 St.

On June 21, 2022, the University Park HPOZ Board, has consultation with developer on second story addition, 1015 W 21st St.; Board raised issues whether it should be a certificate rather than conforming work, was a demolition rather than an addition (based on the HPOZ Ordinance definition, raised issues of materials, massing, scale and impact on street scape.

On July 9, 2022, the UPHPOZ Board by a 4-0 vote denies the second story addition project as presented as it fails to meet the preservation plan for infill in the guidelines of scale and massing, number of windows and placement and the rehabilitation guidelines, and proposed materials.

On December 16, 2022, Mayor Karen Bass issues ED1 streamlining approvals for 100% affordable housing projects “as long as such plans do not require any zoning change, variance, or General Plan amendment.” “local decision-makers, including the Director of Planning and the Chief Zoning Administrator, are authorized to continue to hold all required public hearings under the Los Angeles Municipal Code in a manner consistent with the Governor’s Executive Order N-29-20, and any subsequent orders or published guidance pertaining to local legislative bodies.”

On February 9, 2023, the Director of Planning issues implementation guidelines for ED1 projects. “projects seeking a deviation from development standards (e.g., adjustment, variance, specific plan exception, waiver of dedication/Improvement) are ineligible for the ED 1 Ministerial Approval Process” and “City Planning will review only the objective development standards of the Zoning Code and of any applicable Specific Plans, Redevelopment Plan, Historic Preservation Overlay Zone, Community Plan Implementation Overlay or other Zoning Overlay areas.”

On April 28, 2023 owner applies for a permit for a “NEW 3 STORY TYPE VA 6 UNITS (1 VLI, 2 MI, AND 3 LI) AFFORDABLE HOUSING APARTMENT, 12.22.A.25, SB1818, AB2345, AB1763 INCENTIVES”

On May 2, 2023, University Park HPOZ Board Meeting, under “Consultations”: 1) 1015 W. 21st Street—Demolition of a non-contributing single-family residence and construction of a 3-story, 6-unit multi-family residential building. The board informs applicants it is exceedingly unlikely to get approval for a demolition; the Italianate 3 story is not a replacement for a one-story house in a historic district. Applicants say they will lower their height to 31 1/2, for a 3 story, 6-unit building but applicant doesn’t want to make changes and be denied.

On November 28, 2023, owner files for an ED1 project, ADM-2023-7805-DB-VHCA-ED1, for 7 units.

On May 2, 2024, City Planning issues a Letter of Compliance to OMG 1021 21st LLC for an ED1 project at 1015 W. 21st Street Historic Preservation Overlay Zone. Condition: Prior to the issuance of a building permit, the applicant shall demonstrate compliance with the University Park Historic Preservation Overlay Zone pursuant to Ordinance No. 173,160 and the Citywide Historic Preservation Overlay Zone Ordinance No. 184,903.

On May 31, 2024, owner applies for demolition permit #24019-10000-02156.

On June 11, 2024, owner states no when asked “is the proposed demolition part of a larger development project at the demolition site, and if so, will the larger project require any discretionary approvals from the City?” Failure by a project applicant to disclose future construction or development activities on the project site may result in a violation of CEQA. If the City determines that an application or approval is part of a larger undisclosed project, the City may revoke and/or stay any approvals until a full and complete CEQA analysis of the whole project is reviewed and an appropriate CEQA clearance is adopted or certified.

On July 1, 2024, Mayor Karen Bass issues a revised ED1 excluding from ED1 “E. The project does not include any parcels that are included in the National Register of Historic Places or the California Register of Historical Resources, either individually or within a historic district, or included within a Historic Preservation Overlay Zone (HPOZ), or designated as a City Historic-Cultural Monument, does not include any eligible historic or architectural resource located in the Westwood Village Specific Plan, Central City West Specific Plan, Echo Park CDO District, or the North University Park Specific Plan, and does not include any eligible historic resource identified within the South Los Angeles Community Plan Implementation Overlay (CPIO) Section 1-6.C.5.b, the Southeast Los Angeles CPIO Section 1-6.C.5.b, the West Adams CPIO Section 6.C.5.b, or the San Pedro CPIO Section 7.C.5.b”

On July 22, 2024, the demolition permit #24019-10000-02156 is cleared by HPOZ planning staff with no HPOZ Board review. Planner states arbitrarily “Demolition of the structure was found not to result in the loss of or serious damage to a significant historical or cultural asset pursuant to LAMC Sec. 91.106.4.5; therefore, additional review for the demolition is not required.” This contradicts HPOZ Board review of projects at this site. This unilateral action was not shared with the Board.

On July 25, 2024, #24019-10000-02156, demolition permit was issued.

On July 27, 2024, “short sale,” \$564,500 to OMG 1021 21st LLC and SK Living Trust buyer, from seller OMG1021 21ST LLC.

On November 3, 2024 Request for Modification, permit #4019-10000-02156 filed by West Adams Heritage Association (WAHA.)

On November 13, 2024 Request for Modification, permit #4019-10000-02156, filed by West Adams Heritage Association (WAHA) is denied.

On November 20 2024 Supplemental Request for Modification is filed by WAHA, permit #4019-10000-02156.

On January 3, 2025, sale to OMG 1021 21st LLC and Shkoo LLC, from OMG 1021 21st LLC.

On January 2, 2025, OMG and ShKoo owners obtain mortgage in the amount of \$3,377,500.

January 23, 2025, 1015 WEST 21ST STREET; DBS-240099-DCP, LADBS renders a written determination to WAHA appeal concerning the issuance of the demolition permit; determination is effective January 23, 2025 unless appealed.

On February 4, 2025 WAHA files an appeal with the LADBS of its written determination. Issuance of the demolition permit violates the University Park Preservation Plan, the HPOZ Ordinance, the City's Demolition Ordinance, the processing requirements of the ED1 Mayor's directive, the goals of the South Community Plan and splits the demolition permit from the larger project and should not be deemed ministerial. The Zoning Administrator has the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City.

On April 11, 2025, demo plan approved for ED1 project by City Planning, sheet A1.10D³ Demolition is part of the ED1 plans and no permit ought to have been issued according to the LOC.

On April 22, 2025, ZA Hearing for appeal of the issuance of demolition permit #24019-10000-02156 violates the University Park Preservation Plan, the HPOZ Ordinance, the City's Demolition Ordinance, the processing requirements of the ED1 Mayor's directive, the goals of the South Community Plan and splits the demolition permit from the larger project and should not be deemed ministerial. The Zoning Administrator has the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City.

On May 1, 2025 by unanimous vote at the duly noticed General Board Meeting the Empowerment Congress North Area Neighborhood Development Council (NANDC) Board voted to submit a letter of support of the appeal.

³ Final Plans. Prior to the issuance **of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning.** All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file. (Conditions in May 2, 2023 LOC letter)

RE: CITY PLANNING COMMISSION
MEETING OF DECEMBER 11, 2025
CASE NO.: DIR-2025-0688-BSA-1A
Demolition of 1015 W. 21st Street

Dear Commissioners:

As owners of 1010 W. 21st Street, across the street from the subject property, we have no problem with the design of the new building at 1015 W. 21st or with the loss of the undistinguished house it replaced.

We are concerned, however, that the demolition appears to have occurred without due process. It's important to build new housing, but it's also important to ensure that, in the process, rules are followed and the value of existing structures and neighborhoods is properly considered.

I hope the commission will ensure that the inappropriate process followed in this instance is not repeated.

Thank you.

Jim and Janice Robinson

27 St. James Park

Los Angeles, CA 90007

(213) 663-3022



Subject: 1015 West 21st Street, Los Angeles, CA ,

CASE NO.: DIR-2025-0688-BSA

Thank you for the opportunity to share my thoughts with you on the 1015 West 21st Street Case. I am a native Angeleno, a homeowner in Council District 1 and the founding director of a community arts cultural nonprofit–The Velaslavasay Panorama–which has been headquartered in Council District 8 for the past twenty years, and prior to that was located in Council District 13 from 2000-2004.

I make my home in the University Park HPOZ in Council District 1 on 21st Street–just a few doors down from 1015 21st st–and have been an engaged homeowner and citizen in the area since moving to the neighborhood in 2005.

I was so disturbed when the original structure at 1015 was torn down as it was an action contradictory to HPOZ guidelines on our street, guidelines I am also beholden to as a property owner.

As a homeowner, my own remodeling projects were held to stringent and valuable historic controls–why was this demolition issued? How can this developer company be exempt from the HPOZ guidelines when an individual person must adhere to this regulation?

The University Park HPOZ was established to protect a cultural resource neighborhood in the city of Los Angeles. This is what creates a feeling of legacy and community – a commitment to local history which cannot be replicated elsewhere. The demolition of a 1905 bungalow at 1015 W. 21st Street violates the aims of the HPOZ and the University Park Preservation Plan.

The demolition permit issued for the 1905 bungalow at 1015 W. 21st Street (24019-10000-021560):

- violates the University Park Preservation Plan which requires special consideration for buildings from the period of significance
- violates the HPOZ Ordinance which requires a CCMP for any demolition

- ignores the City's Demolition Ordinance
- violates the processing requirements of the ED1 Mayor's directive which excludes project that are a variance
- ignores the goals of the South Community Plan which places a high value on preserving historic neighborhoods and

This situation splits the demolition permit from the larger project and should not be deemed ministerial.

The Zoning Administrator has the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City. i.e. "Sec. 22.2.09 Permits Issued in Error A. Notwithstanding any other provisions of this Code or any other ordinance of the City, no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City. B. Any permit or license issued in violation of any provision of this Code, or any other ordinance of the City is void. Any permit or license that purports to authorize any act prohibited by any other provision of this Code or any other ordinance of the City is void."

The permit was issued in violation of numerous City Ordinances. The entity behind the demolition must be held accountable.

The violation inherent in the demolition is flagrant and cannot be ignored. It is unfair to all other property owners in the University Park HPOZ and the demolition threatens the character of our community.

Please hold those responsible for this accountable and take these violations in consideration with how the future of the property at 1015 W. 21st Street is handled.

Thank you for the opportunity to share my thoughts.

Respectfully,



Sara Velas
21st Street Homeowner
Velaslavasay Panorama Founder & Director



Julianne Burg
President

Marco Flores
Vice President

Samantha Burg
Secretary

Julie Burg
Treasurer

Anna Joyce
Area 1
Representative

Vacant
Area 1
Representative

John Noyola
Area 2
Representative

Milton Alvaranga
Area 2
Representative

Jean Frost
Area 3
Representative

Nicolas Creighton
Area 3
Representative

Jim Childs
At Large
Representative

Vacant
At Large
Representative

Edwin Ramirez
At Large
Representative

Vacant
USC Interest
Representative

Dario Gamboa
Business Interest
Representative

November 29, 2025

City Planning Commission
200 N. Spring Street, City Hall Room 314
Los Angeles, Calif. 90012

Via email cpc@lacity.org
Cc: Cecilia Lamas

Re: RE: 1015 w 21 Street DIR-2025-0688-BSA-1A
Appeal of Demolition Permit No.24019-10000-02156

Honorable Commissioners,

The Empowerment Congress North Area Neighborhood Development Council (NANDC) supports the appeal of the West Adams Heritage Association and urges that the AZA sustain the appeal. By unanimous vote at the duly noticed General Board Meeting of May 1, 2025 the NANDC Board voted to submit a letter of support.

This support is consistent with the NANDC position regarding ED1 projects in historic districts which NANDC submitted on 3/19/2024 in a CIS regarding CF 23-0623-S1. "Executive Directive No. 1 (ED 1) / 100 Percent Affordable Housing Projects / Procedures and Performance Standards / Los Angeles Municipal Code / Amendment." In our CIS we stressed the importance of the guard rails that exist in historic districts and other overlays. This permit was issued without conforming to the existing overlays.

NANDC supports the appeal which states "the demolition permit issued violates the University Park Preservation Plan, the HPOZ Ordinance, the City's Demolition Ordinance, the processing requirements of the ED1 Mayor's directive, the goals of the South Community Plan and splits the demolition permit from the larger project, and should not be deemed ministerial. The Zoning Administrator has the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City." The permit is void and should be rescinded.

We appreciate your consideration. NANDC is a self-governed, self-directed, and independent organization empowered by the Los Angeles City Charter. This charter offers neighborhood councils a role in the City's decision-making process. NANDC was certified by the City of Los Angeles on April 27, 2002, and was the 24th neighborhood council formed under the guidelines of the City Charter.

Sincerely,



Julianne C. Burg, President

Empowerment Congress North Area Development Council (NANDC)

(NANDC) www.nandc.org

P.O. Box 18769

Los Angeles, CA. 90018

Cc: Councilmember Eunisses Hernandez

Louie Lieva, CD1

Kyle Hickey, CD1



CPC-2025-5392-CA Comments

Michael Nigosian <mnigosian@gmail.com>

Tue, Dec 2, 2025 at 2:00 PM

To: Andrew Jorgensen <andrew.jorgensen@lacity.org>

Cc: cpc@lacity.org

Hello Andrew and City planning commission.

I attended the zoom presentation and hearing on 11/18/25 and This is a follow up to that hearing.

First of all, I will say that I was extremely disappointed in how the planning staff was prepared for this meeting. Questions were asked that they were unable to answer and there should have been some basic preparation for this meeting as this is a major change and issue regarding the operations of the permitting process in the city of LA. Simple questions, such as How many planners will there be checking zoning VS how many LADBS plan checkers are there who were already checking zoning along with building code? (The answer is 177 LADBS plan checkers and an additional 42 who are taking on all zoning. This is clearly a bottle neck. This is an important questions because up until earlier this year all zoning related clearances were being reviewed by the main LADBS plan checker assigned to each project. This was a very efficient system and for some reason a separate zoning review was added only in the last year (we were told this was a pilot program to see the befits, which there are none). They spoke of this review as it has been around for several years and that it is how we have been operating which is a misrepresentation of the truth. It may be that they are uneducated in this matter. I will continually be a vocal strong opponent of this additional zoning review as not one planner or staff can provide one advantage to this new system. Without any pros that means that this is solely to slow down and clog up the plan check review with additional steps, additional staff and additional interpretations.

To provide some first hand experience and context below for a typical back room plan check (SFD/Duplex and or ADU).

Previous System (Prior to the zoning department) (1-2 Weeks)

Project is submitted to LADBS

Project is assigned to an LADBS Plan checker.

If expedited, project is returned to applicants within 3-7 days with all zoning and building corrections and comments and All clearances

Applicant addresses corrections and clearances and returns to one LADBS plan checker for final RTI or permit issuance

Current System (With additional zoning department review) (2-3 Months)

Project is submitted to LADBS

Project is assigned to an LADBS Plan checker.

If expedited, project is returned to applicants within 3-7 days with only building code corrections

Zoning review takes 3-4 weeks before an email is sent from staff to provide PDF plans to the zoning plan checker who then takes another 1-2 weeks to review.

Applicant cannot address zoning related clearances until the zoning plan checker adds them which delays the project unnecessarily by a month.

Applicant must make all zoning corrections and email them to zoning plan checkers who takes another 1-2 weeks to review and respond.

Applicant addresses building code corrections and clearances and returns to one LADBS plan checker for final RTI or permit issuance. If

the LADBS plan checker doesn't agree with a zoning item they send you back to the zoning plan checker to tell them they were wrong and they need to review again adding additional time and delays.

As you can see, the zoning review is an unnecessary delay and additional step that was not needed for decades and still is not needed.

A couple questions that should be answered by staff in their recommendation

1. How much additional is it costing to have hired these additional 42 planning staff members who are doing the job that was already done by the LADBS plan checkers with no additional cost? Answer per 2025-2026 fiscal budget is an additional \$6 Million dollars. How does this make sense?

2. Are LADBS plan checkers going to receive a pay cut for the reduction in scope of their work?

3. What benefit does the additional zoning review provide to the processing of a permit? Timing? Efficiency?

4. Will this zoning review be applied to counter and ECPC plan checks? If so there will be no more same day review possible, again reducing the efficiency that's already in place for no benefit

5. How are 42 staff members going to do the work of the existing 177 plan checkers and how is this not going cause a bottleneck which it already does?

As you can see there is a lot of discussion and information that was not provided at the last hearing. Realizing that most if not all staff and planners have never actually processed a permit through the city processing, you should be reaching out to people like me who are Architects, expeditors and engineers before enacting systems that affect the status quo again with no clear benefit and an extremely high additional unnecessary cost (an additional \$6.2 Millions dollars annually which is unnecessary).

2025-26 Budget Request Summary and Ranking

Department: Los Angeles Department of Building and Safety

Approved by:  11/22/2024

	Positions		General Fund	Full-Time	All Other Salaries	Expense &	Total Budget
	Reg	Reso	Revenue	Salaries (001010 & 001012)	(As-Needed, Hiring Hall, Overtime)	Special	
2024-25 Adopted Department Budget:	1,009	120	\$ 5,426,003	\$ 136,177,797	\$ 16,549,007	\$ 3,031,004	\$ 155,757,808

Departmental Requests

(List all requests individually in the Department's order of priority, including each section of the single program request form [base budget and requests A+] and each various program request.)

RANKING	Program Code	Request Code	Program Name (State "Various" for Various Program requests)	Request Name	Request Type	Positions		General Fund	Full-Time	All Other Salaries	Expense &	Total Budget
						Reg	Reso	Revenue	Salaries (001010 & 001012)	(As-Needed, Hiring Hall, Overtime)	Special	
1	0811	Base	0811 - Structural Plan Check	Base	BASE	177	0	\$ -	\$ 19,583,696	\$ 5,015,877	\$ 46,377	\$ 24,645,950
2	0812	Base	0812 - Green Buildings and Electrical and Mechanical Engineering	Base	BASE	92	0	\$ -	\$ 10,424,146	\$ 2,008,099	\$ 54,673	\$ 12,486,918
3	0815	Base	0815 - Commercial Inspection and Licensing	Base	BASE	242	0	\$ -	\$ 31,748,270	\$ 3,835,688	\$ 908,064	\$ 36,492,022
4	0814	Base	0814 - Residential Inspection	Base	BASE	118	0	\$ -	\$ 14,483,107	\$ 1,591,000	\$ 429,113	\$ 16,503,220
5	0813	Base	0813 - Grading Reports and Inspections	Base	BASE	45	0	\$ -	\$ 5,880,810	\$ 541,000	\$ 84,925	\$ 6,506,735
6	0816	Base	0816 - Development Services Case Management (DSCM)	Base	BASE	34	0	\$ -	\$ 3,615,749	\$ 761,901	\$ 62,314	\$ 4,439,964
7	0817	Base	0817 - Residential and Commercial Code Enforcement	Base	BASE	87	0	\$ 4,091,200	\$ 10,755,567	\$ 774,086	\$ 1,072,281	\$ 12,601,934
8	0818	Base	0818 - Conservation of Existing Structures and Mechanical Devices	Base	BASE	29	0	\$ 1,606,500	\$ 3,403,186	\$ 347,703	\$ 221,502	\$ 3,972,391
9	0850	Base	0850 - General Administration and Support	Base	BASE	135	0	\$ -	\$ 14,601,138	\$ 1,249,206	\$ 198,619	\$ 16,048,963
10	0849	Base	0849 - Technology Support	Base	BASE	47	0	\$ -	\$ 5,777,074	\$ 499,922	\$ 1,495	\$ 6,278,491
11	0848	Base	0848 - Development Services Systems	Base	BASE	3	0	\$ -	\$ 383,400	\$ -	\$ 242	\$ 383,642
12	0811	A	0811 - Structural Plan Check	Continue Funding for Airports Structural Plan Check	CONTINUE	0	4	\$ -	\$ 668,196	\$ -	\$ 1,533	\$ 669,728
13	0811	B	0811 - Structural Plan Check	Continue Funding for Soft Story Plan Check	CONTINUE	0	10	\$ -	\$ 1,242,859	\$ -	\$ 2,567	\$ 1,245,426
14	0811	C	0811 - Structural Plan Check	Continue Funding for Non-Ductile Concrete Plan Check	CONTINUE	0	6	\$ -	\$ 917,000	\$ -	\$ 2,174	\$ 919,175
15	0811	D	0811 - Structural Plan Check	Continue Funding for Backfile Conversion	CONTINUE	0	4	\$ -	\$ 210,019	\$ -	\$ -	\$ 210,019
16	0811	E	0811 - Structural Plan Check	Continue Funding and Expand Zoning Review Section	NEW	0	42	\$ -	\$ 6,193,182	\$ -	\$ 13,510	\$ 6,206,691
17	0811	F	0811 - Structural Plan Check	Continue Funding for High-Rise & Non-Ductile Concrete Review	CONTINUE	0	1	\$ -	\$ 201,802	\$ -	\$ 570	\$ 202,372
18	0812	A	0812 - Green Buildings and Electrical and Mechanical Engineering	Continue Funding for Airport Plan Check Services	CONTINUE	0	2	\$ -	\$ 321,673	\$ -	\$ 642	\$ 322,315
19	0815	A	0815 - Commercial Inspection and Licensing	Continue Funding for Airport Inspections	CONTINUE	0	9	\$ -	\$ 1,170,903	\$ -	\$ 37,170	\$ 1,208,073
20	0815	B	0815 - Commercial Inspection and Licensing	Continue Funding for Soft Story Inspection	CONTINUE	0	9	\$ -	\$ 1,042,393	\$ -	\$ 37,170	\$ 1,079,563
21	0815	C	0815 - Commercial Inspection and Licensing	Continue Funding for the Virtual Inspection Program	CONTINUE	0	11	\$ -	\$ 1,355,559	\$ -	\$ 42,509	\$ 1,398,068
22	0815	D	0815 - Commercial Inspection and Licensing	Continue Funding for Affordable Housing Inspection	CONTINUE	0	5	\$ -	\$ 638,675	\$ -	\$ 17,729	\$ 656,404
23	0816	A	0816 - Development Services Case Management (DSCM)	Continue Funding for Cannabis Business Case Management	CONTINUE	0	2	\$ -	\$ 287,825	\$ -	\$ 642	\$ 288,467
24	0816	B	0816 - Development Services Case Management (DSCM)	Continue Funding for Expanded Inspection Case Management	CONTINUE	0	3	\$ -	\$ 362,334	\$ -	\$ 12,390	\$ 374,724
25	0816	C	0816 - Development Services Case Management (DSCM)	Continue Funding for the Restaurant and Small Business Express Program	CONTINUE	0	2	\$ -	\$ 226,686	\$ -	\$ 8,260	\$ 234,946

1 of 3

- Zoning Review Section.** LADBS created the Zoning Review Section in FY 2022-23 to streamline the permitting process for affordable housing projects and homeless shelters. This permitting process is expedited through early zoning reviews and the separation of the Zoning Code and Building Code reviews. LADBS proposes continuing to fund this Section in order to support the Mayor's ED 1 - Expedition of Permits and Clearances for Temporary Shelters and Affordable Housing Types. Since it was first launched, LADBS expanded the program to provide Zoning Code review for all **plan checks**. This function will be transferred to the Department of City **Planning** (DCP) in FY 2025-26, where the program will continue to support the City's housing development efforts.

Thank You,

Michael Nigolian

Licensed Architect lic #C-35308
Real Estate Broker lic #01892381
General Contractor lic #979516

Miracle Mile North Design Review Board Member
West Adams Heritage Association - Member

Tel: 760.831.9971
Email: mnigolian@gmail.com



Planning Case Number CPC-2025-5392-CA + Environmental Case Number ENV-2025-5393-CE

Yoav Weiss <yoav.weiss@gmail.com>

Wed, Dec 3, 2025 at 11:34 AM

To: cpc@lacity.org, andrew.jorgensen@lacity.org, clare.kelley@lacity.org, vince.bertoni@lacity.org, shana.bonstin@lacity.org, kevin.keller@lacity.org, flora.melendez@lacity.org, anna.orellana@lacity.org, haydee.urita-lopez@lacity.org, arthi.varma@lacity.org, lisa.webber@lacity.org, denise.chavez@lacity.org

Cc: Allen Zipper - CD5 <allen.zipper@lacity.org>

Hello Los Angeles Planning Department,

I'm writing to voice my staunch disagreement with the additional zoning review you have thrown onto virtually all plan check review processes. What used to be an arguably SOMEWHAT efficient process has turned into a complete and utter nightmare **FOR NO REASON**.

These zoning planners have **absolutely no clue what they're doing**, and they are brand new on the job. This has destroyed the overall time to get a project permitted, and there are 0 net benefits.

This was a pointless decision that is **costing taxpayer money**, and homeowners lots of time.

The zoning planners are requesting changes and items in direct conflict with the building & safety plan checkers, who have been handling zoning issues for years.

You should be ashamed of yourselves for introducing such a **ridiculously stupid policy**, and should **reverse this decision immediately**.

Feel free to contact me for specific experiences...though I doubt anyone copied here actually will.

Permitting in the city of Los Angeles is getting worse and worse every day. It's no wonder people are leaving the city in droves..nobody wants to deal with the bureaucratic nonsense. What a joke...

Yoav Weiss, Architect

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310.254.5836

ALSTON & BIRD

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Los Angeles, CA 90071
213-576-1000 | Fax: 213-576-1100

Matthew Wickersham

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Via CPC lacity.org

December 8, 2025

Los Angeles City Planning Commission
200 North Spring Street
Los Angeles, CA 90012

Re: Proposed Oil and Gas Drilling Ordinance, Council File No. 17-0447-S2; CPC-2025-2884-CA, ENV-2025-2885, Dec. 11, 2025, Item 10 CPC Mtg

Dear Commissioners,

We represent E&B Natural Resources Management Corporation, Hillcrest Beverly Oil Corporation, E&B ENR I, LLC, and Elysium Natural Resources, LLC (collectively, “E&B”) and provide the following comments in advance of the City Planning Commission’s (“CPC” or “Commission”) December 11, 2025 meeting where the CPC will consider the Proposed Oil and Gas Drilling Ordinance per AB 3233, as drafted November 2025 (the “Oil Ordinance”)¹. The Oil Ordinance would immediately prohibit new oil and gas extraction, declare all existing wells a nonconforming use, prohibit the maintenance, re-drilling, deepening, or intensification of existing wells, and require the cessation of all oil and gas operations within twenty years, subject only to a narrow, highly discretionary “health and safety” exception.

The Oil Ordinance is another attempt by the City to adopt a law previously rejected by a Los Angeles Superior Court judge. As the staff report acknowledges, the Oil Ordinance amends the same core provisions of the Los Angeles Municipal Code as Ordinance No. 187,709 (adopted on December 2, 2022, and effective January 18, 2023) (“2022 Ordinance”)—LAMC sections 12.03, 12.20, 12.23, 12.24, and 13.01—and now also adds new provisions in Chapter 1A to fold the same regime into the City’s updated zoning framework. In general, the Oil Ordinance repeats much of the rescinded 2022 Ordinance: it bans new wells citywide, converts all existing wells to nonconforming uses, imposes a facial twenty-year “amortization” deadline, prohibits “maintenance” while allowing only narrow “servicing,” and applies a one-year “idle-terminated” rule. The primary changes are that the City now cites AB 3233 and SB

¹ By this letter, E&B incorporates its prior submissions regarding the Zoning Administrator Interpretation, dated June 12, 2025, defining well maintenance (ZA-2025-2976-ZAI-1A) (“2025 ZAI”). For purposes of any subsequent litigation, this letter is also deemed to include the administrative record in the prior oil and gas ordinance litigation as discussed in the March 3, 2025, stipulation for entry of judgment and writ filed in the prior litigation.

1137 as its legal foundation, codifies the definition of maintenance and the health and safety process directly into the zoning code, extends the rules into Chapter 1A, and expressly reserves the right to shorten the twenty-year period while disclaiming any vested rights in that period.

E&B currently conducts oil and gas operations at several locations within the City of Los Angeles. As part of these operations, E&B owns certain mineral rights directly in fee and also leases some mineral rights from royalty owners. Adoption of the Oil Ordinance would be devastating to E&B's operations, stripping it of vested rights from its permits and leases, and interfering with its ability to conduct business. The Oil Ordinance is also arbitrary, unconstitutional, and environmentally harmful.

For these reasons and as set forth below, E&B opposes adoption of the Oil Ordinance and the accompanying Initial Study and Mitigated Negative Declaration ("IS/MND"). The Oil Ordinance is still preempted by state and federal law, remains an arbitrary and unsupported exercise of the police power, imposes an illusory amortization scheme that does not cure taking concerns, effects an unconstitutional taking and deprivation of vested and contractual rights, ignores the dominant mineral estate, and is not supported by substantial evidence of health and safety risks. The IS/MND fails to comply with the California Environmental Quality Act ("CEQA") and an Environmental Impact Report ("EIR") is required. In addition, it is premature for the Commission to act on December 11 while the IS/MND is still out for public review until December 29, 2025.

I The Oil Ordinance Remains Preempted by Federal and State Law

Judge Kin of the Los Angeles Superior Court previously determined that the 2022 Ordinance is preempted by state law because it contradicts and is implicitly limited by section 3106 of the Public Resources Code. Judge Kin relied upon the Supreme Court's 2023 decision in (2023) 15 Cal.App.5th 135 (" "). The decision by the California Supreme Court in specifically held that local governments are preempted from interfering in the regulation of oil and gas operations. As the Oil Ordinance is substantively identical to the 2022 Ordinance, the Oil Ordinance is also preempted under state law.

The Oil Ordinance references section 3106.1 to the Public Resources Code, which became effective on January 1, 2025 pursuant to Assembly Bill (AB) 3233. While AB3233 attempts to negate the holding in the decision, the preemption determination made by the Supreme Court in the case was based on the constitutional provisions that provide for preemption by state law over conflicting local ordinances. The California Supreme Court is the final arbiter on these state constitutional issues unless a constitutional amendment is adopted.

The Oil Ordinance is also preempted as its prohibition of specific oil production techniques intrudes on an area "fully occupied" by CalGEM and SCAQMD. The extensive host of State laws and associated regulations clearly reflect an intent to occupy the entire area of oil and gas production. SCAQMD also has extensive rules regarding the air quality concerns that the 2025

Ordinance purportedly seeks to address by its new requirements. (, SCAQMD Rules 1148.1 and 1148.2.) “The Legislature has designated regional air pollution districts as the primary enforcers of air quality regulations.” (. (2012) 200 Cal.App.4th 251, 269.)

The Oil Ordinance is also preempted by federal law as it will impermissibly intrude upon the regulation of injection wells in the City. The State regulates injection wells pursuant to a delegation of authority from the U.S. Environmental Protection Agency to CalGEM under the federal Safe Drinking Water Act. “Congress intended that states retain authority respecting underground injection so long as it does not impinge on the UIC program administered by the EPA.” ((N.D.N.Y. 2004) 309 F.Supp.2d 357, 367-368.) “[S]urely the prohibition above prevents such local law from altogether preventing UIC activity.” ((S.D.W.Va. 2016) 191 F.Supp.3d 583, 601, *affd.* on other grounds (4th Cir. 2017) 870 F.3d 322.) Actions by local governments that make it effectively impossible for operators to maintain or continue to use injection wells are preempted by federal law.

By imposing a convoluted approval process that will result in the effective abandonment of existing oil and gas operations, the Oil Ordinance frustrates, contradicts, and intrudes upon federal and state law.

II The Oil Ordinance is Not a Legitimate Exercise of the Police Power

The Oil Ordinance is arbitrary, capricious, entirely lacking in evidentiary support, and contrary to established public policy supporting the extraction of oil and gas in the City. Even if the City has some authority to adopt land use regulations, the City’s police power is not unlimited. Land use regulations, such as the Oil Ordinance, must be “reasonable in object and not arbitrary in operation [in order to] constitute a valid exercise of that power” and reasonably related to the public welfare, which the staff report fails to demonstrate. (

(1956) 146 Cal.App.2d 762, 768;

(1976) 18 Cal.3d 582.) The Oil Ordinance will ultimately result in the loss of good-paying industry jobs, such as those for which E&B supplies to the City’s residents through its oil and gas operations. The City fails to properly forecast the probable effect of the Oil Ordinance, fails to identify the competing interests involved, and fails to justify why the Oil Ordinance reflects a reasonable exercise of its police power.

The Oil Ordinance will significantly curtail efforts to continue oil and gas operations and will add significant new requirements and procedures to get approval for oil well maintenance. In effect, this will reduce the ability to continue with oil and gas operations.² But importantly, these new requirements and procedures placed on oil and gas operations will not eliminate the

² The 2025 Ordinance also includes vague and ambiguous language. For instance, the Oil Ordinance’s addition to section 12.23.C.4(a)(3) prohibits the use of new or temporary Oil Well site equipment that was not originally permitted. The Oil Ordinance and staff report do not explain what is meant by the phrase “equipment” or “originally permitted.”

City's ongoing demand for oil and gas products. To meet demand, every barrel of oil that is not produced within the City must necessarily be produced elsewhere, requiring further expenses and potential negative environmental impacts by instead requiring the importation of oil. Additionally, reliance on foreign oil in the midst of the current geopolitical turmoil will create threats to the stability of the state's economy.

For these reasons, adoption of the Oil Ordinance would violate the due process protections of the U.S. and California Constitutions. The City may not deprive persons of property rights without due process of law. (Cal. Const., Art. 1, § 7(a); U.S. Const. amend V, XIV;

(1996) 43 Cal.App.4th 677, 686.)

Arbitrary or irrational governmental action that infringes on a property owner's rights violates substantive constitutional due process. (

(2005) 544 U.S. 528,

541;

(1981) 126 Cal.App.3d 330, 337.) In a rush

to expand the scope of well maintenance through the Oil Ordinance, the City has failed to demonstrate that current oil operations or maintenance techniques in the City result in any environmental, health, or safety hazards. Without any viable justification for its actions, the City lacks any legitimate interest in restricting these operations throughout the City.

III The Oil Ordinance is an Unconstitutional Taking of E B's Vested Rights

The U.S. and California Constitutions provide that private property shall not be taken without just compensation. (U.S. Const. amend. V; Cal. Const., Art. 1, § 19.) These constitutional protections apply to regulatory takings. (

(1992)

505 U.S. 1003, 1014.) "The right to remove oil and gas from the ground is a property right."

(

(2002) 103 Cal.App.4th 172, 186.)

E&B has vested property rights by its fee and leasehold ownership in mineral rights and its right to conduct its operations in the City, but the Oil Ordinance ignores these rights, significantly curtailing maintenance efforts, which will lead to the abandonment of wells. When dealing with vested property rights, the City cannot terminate E&B's existing operations without either the payment of just compensation or a demonstration that the existing, permitted operations and the associated maintenance are presently constituting a nuisance (which it has not).

Similarly, E&B's vested oil and gas rights are uniquely situated in the City, and the Oil Ordinance limits E&B's ability to properly maintain its oil wells and effectively eliminate the extraction of those resources in the City, without the ability to extract them elsewhere. (

(1954) 127 Cal.App.2d 442.) The Oil Ordinance will effectively work to

deprive E&B of the right to engage in the only business for which its subsurface mineral rights are fitted. Under the diminishing asset doctrine, E&B is entitled to produce oil and gas resources under its vested rights until the resource is exhausted or otherwise uneconomical to produce. As such, the Oil Ordinance imposes an unconstitutional taking of E&B's property as an owner of mineral rights and as an oil and gas operator, along with the property of the landowners and the mineral rights holders in connection to E&B's leasehold interests

IV The Oil Ordinance's Amortization Scheme is Illusory and Unlawful

The Oil Ordinance prohibits maintenance operations necessary to continue the operation of wells, while holding out a narrow Health and Safety Exception as a supposed safety valve. In practice, any operator attempting to secure City approval to perform maintenance under that exception faces a discretionary process that can easily run months; during that time, production may have to be curtailed, and under the City's own nonconforming use rules, a year of "discontinued" operations results in a deemed termination of the use. By cutting off routine maintenance and routing essential work through a slow, uncertain exception process, the City is effectively terminating these uses long before any nominal 20-year period ever runs.

At the same time, the City has not produced a credible amortization analysis to justify a uniform 20-year phase-out for all wells. The City Attorney's office has previously advised the council-members that in order to defend this type of ordinance in litigation, it must have "expert amortization studies and proper environmental review."³ While the City has prepared amortization studies, they are deficient and not relied upon by the City here. And as discussed below, its environmental review is cursory and improper.

The City fails to evaluate the legal propriety of establishing an amortization period for the extraction of mineral resources and ignores the legal doctrine that would invalidate this proposed ordinance – the diminishing asset doctrine. (

(1996) 12 Cal.4th 533.) The California Supreme Court in recognized the "diminishing asset" doctrine and defined the scope of vested rights for mining, quarrying and other extractive uses, recognizing the unique qualities of extractive uses and holding that it includes an expansion of those uses. "The very nature and use of an extractive business contemplates the continuance of such use of the entire parcel of land as a whole, without limitation or restriction to the immediate area excavated at the time the ordinance was passed." (at pp. 553-554 [citing cases].)

Similarly, E&B's vested oil and gas rights are uniquely situated in the City, and the proposed ordinance seeks to terminate the extraction of those resources in the entire City, without the ability to extract them elsewhere. ((1954) 127 Cal.App.2d 442.) Under the diminishing asset doctrine, E&B is entitled to produce oil and gas resources under its vested rights until the resource is exhausted or otherwise uneconomical to produce -- the continued production of oil and gas resources is the expanded use and is protected under

³ Comments by Deputy City Attorney Jennifer Tobkin to Energy, Climate Change and Environmental Justice committee, dated Nov. 17, 2020 at 1:59:00, https://lacity.granicus.com/TranscriptViewer.php?view_id=103&clip_id=20391

V The IS MND Violates CEQA and an EIR is Required

CEQA applies whenever a government agency approves a discretionary project, defined as “an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” Pub. Res. Code § 21065. CEQA defines “project” as the “whole of an action” and prohibits segmentation of project activities in an effort to minimize the evaluation of environmental effects. “Accordingly, CEQA forbids piecemeal review of the significant environmental impacts of a project.” , 211 Cal.App.4th 1209, 1222 (2012) (internal citations omitted). “Agencies cannot allow environmental considerations to become submerged by chopping a large project into many little ones.”

The entire activity before the City is the phasing-out of oil operations within its City limits, but the IS/MND illegally only analyzes a portion of that project. The IS/MND leaves for future determination the environmental impacts of the abandonment and future condition of the former oil sites, including how those compare to the current oil operations. As stated in the IS/MND itself, “[its] analysis does not examine impacts from remediation and/or future development.” (IS/MND at p. 40.) This activity is reasonably foreseeable as a result of the initial “project,” and must be considered in an EIR. The IS/MND also fails to analyze the potentially significant environmental effects to air quality, aesthetics, traffic, odor, and noise as a result of the accelerated rate of abandonment activities as a result of the Oil Ordinance.

In addition, the IS/MND assumes a 20-year phase-out period in calculating air quality emissions from accelerated abandonment activities (see, e.g., IS/MND at pp. 52-54), but it fails to consider the potential that the City may shorten the amortization period. At Section 12.23.C.4(a)(5), the Oil Ordinance specifically contemplates that the City may “alter or shorten” the 20-year period and disclaiming any vested rights to operate for that 20-year period. In fact, the City has already hired consultants to prepare three widely-divergent amortization studies.⁴ These studies had multiple technical problems, including a reliance on inappropriate approximations of capital expenditures and cost information. Evidently recognizing these issues, City Planning has not relied upon these amortization studies as a basis for the adoption of the Oil Ordinance. But by its prior actions in preparing amortization studies to support a shorter amortization period, the possibility of such an action is a reasonably foreseeable consequence of the adoption of the Oil Ordinance. So, the City cannot rely upon an IS/MND that blindly assumes that the accelerated abandonment activities will necessarily take place over the course of twenty years. The City may not piecemeal this project into separate, more palatable stages. CEQA requires that “environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences.” (

⁴ LA City, The Amortization Study, available at https://dpw.lacity.gov/sites/g/files/wph1766/files/2025-05/Amortization%20sub%20page%20with%20announcement%20of%20Study%20Release%20050225%20with%20Zoom%20link_0.pdf

(1988) 47 Cal.3d 376, 396 [holding that CEQA review must consider the reasonably foreseeable future expansion of the project].)

Similarly, the City improperly minimized the environmental consequences of this Oil Ordinance by adopting its broad definition of well maintenance in the 2025 ZAI (immediately after the Court-ordered rescission of its prior ZAI) and stating that this action required no environmental review. By broadly expanding the City's historical interpretation of well maintenance, the 2025 ZAI (and, if adopted, the Oil Ordinance) will drastically affect oil operator's ability to maintain their wells, and thus have a significant environmental impact on its ability to access mineral resources.

"Under CEQA, the agency must consider the cumulative environmental effects of its action before a project gains irreversible momentum." (1986) 187 Cal.App.3d 1325, 1333; see also (1986) 183 Cal.App.3d 229, 249-25 ["the difficulty of assessing future impacts of a zoning ordinance does not excuse preparation of an EIR; such difficulty only reduces the level of specificity required and shifts the focus to the secondary effects"].) The "division of the project into two parts with 'mutually exclusive' environmental documents [is] 'inconsistent with the mandate of CEQA' and constitute[s] an abuse of discretion." (1986) 187 Cal.App.3d 1325, 1333-1336, citing cases.)

Under the "fair argument" standard, an EIR is required whenever substantial evidence in the record supports a "fair argument" that significant impacts may occur. (1974) 13 Cal.3d 68; (1980) 106 Cal.App.3d 988; Cal. Pub. Resources Code §§ 21080(c), (d), 21100(a); CEQA Guidelines, § 15064(f)(1).) The Oil Ordinance will undoubtedly impact the availability of mineral resources in the City and the State since the stated goal of the City is to stop oil production within the City limits. "Mineral resources" are an environmental factor pursuant to CEQA, and the "loss of availability of a known mineral resource that would be a value to the region and the residents of the state" or the "loss of availability of a locally important mineral resource recovery site" constitutes an adverse environmental impact. (CEQA Guidelines, Appendix G, § XII(a), (b); Pub. Resources Code § 21060.5.) The City's own Oil and Gas Health Report dated July 25, 2019, which is incorporated herein by reference, confirms that 1.6 billion barrels of recoverable oil and gas reserves remain beneath the City.⁵ While the Staff Report now argues that oil and gas reserves are not considered a mineral resource (Staff Report at A-20), this argument is non-sensical and contradicts decades of prior environmental impact reports prepared by the City analyzing the impact of projects on oil and gas reserves under the Mineral Resources section.

In particular, the IS/MND does not evaluate the impacts to air quality, GHG, and energy from replacing the State's and the City's demand for oil and gas products as a result of the restrictions by the Oil Ordinance on the production of oil and gas within the City. The

⁵ City of Los Angeles, Office of Petroleum and Natural Gas Administration and Safety, Oil and Gas Health Report, dated July 25, 2019, available at https://clkrep.lacity.org/online/docs/2017/17-0447_rpt_BPW_07-29-2019.pdf at page 19.

elimination of oil and gas produced in the City of Los Angeles does not eliminate the State's demand, or the City's demand for oil and gas products. Every barrel of oil that is not produced in the City will need to be produced elsewhere, and most likely imported from other countries. Over the past several years, California sources of petroleum have been replaced by foreign sources. Substantial evidence supports a fair argument that the air quality, GHG, and energy effects of this transition will have significant environmental effects requiring further review under CEQA.

Importing crude oil from foreign sources instead of producing crude locally results in significantly higher GHG emissions, and associated criteria pollutant emissions, as confirmed by several state and county agencies.⁶ Since 2012, CARB has been calculating the Carbon Intensity (CI) of crude oils produced from various parts of the world to establish the GHG life cycle emissions from such crude oils. According to CARB, the average CI score for all crude oil produced and transported to refineries in California is, on average, 11 to 12 grams of carbon dioxide equivalent per megajoule (g CO₂e/MJ). Foreign crude oils have been calculated by CARB to have a CI score around this same average value of 11 to 12 g CO₂e/MJ.

As most recently calculated in CARB's 2023 report, E&B's operations in the City have the following CI scores: Beverly Hills: 5.41; Cheviot Hills: 3.49; Las Cienegas: 4.96; Salt Lake: 3.18; Salt Lake South: 6.34; and San Vicente: 3.22. These scores are significantly lower than the average CI scores for crude oil. Crude oil from E&B's operations will be delivered via pipeline to market. Pipeline transportation is an efficient means of transporting crude oil with minimal associated GHG emissions. Foreign-based crude oil must be delivered to the California market by tanker vessels. Tanker vessels contribute to much higher emissions due to long distances traveled from around the world.⁷

⁶ CARB, https://ww2.arb.ca.gov/sites/default/files/classic/fuels/lcfs/crude-oil/2023_Crude_Average_CI_Calculation_final.pdf; CalGEM, https://www.conservation.ca.gov/calgem/Pages/SB4_Final_EIR_TOC.aspx, at 12.2-37 ["by increasing the activity of oil and gas extraction outside of California, this alternative would cause increased GHG from sources that are not required to offset the GHG to comply with California's cap, resulting in an overall net increase in GHG emissions compared with both existing conditions and the project"]; at 11.12-4, 12.2-49, C.2-63, C.2-84; LA County, <https://planning.lacounty.gov/long-range-planning/baldwin-hills-csd>, at 4.2-42 to 4.2-45 ["The use of foreign crude oil is associated with substantial emissions associated with transportation [which] causes the greenhouse gas lifecycle emissions associated with foreign crude oil to be substantially higher than California crude oil").

⁷ CARB's calculation of intensity values is also likely to understate the true environmental consequences of these foreign imports. Institute for Energy Research, Tipping the Scales, <https://www.instituteenergyresearch.org/wp-content/uploads/2022/07/Tipping-the-Scales.pdf>

The IS/MND fails to consider cumulative impacts from other reasonably foreseeable restrictions on oil operations, such as a similarly restrictive ordinance proposed by the County of Los Angeles and the passage of SB 1137 by the State (imposing setbacks and increased restrictions on oil wells within a “health protection zone”). These cumulative impacts will result in increased well abandonments. CEQA also requires an analysis of other past, current, and probable future projects (including those unrelated to oil production restrictions). The IS/MND contains no discussion of any other projects. The IS/MND also fails to analyze the cumulative impacts from increased GHG and other air emissions from increased imports of oil as a result of the reduced local production. Accordingly, the IS/MND fails to meet the minimum standards of CEQA for cumulative impacts analysis.

The IS/MND also fails to discuss other reasonably foreseeable indirect impacts. This requirement extends to the adoption of lead agency ordinances that result in changes to land use patterns. There is no discussion as to the potential impacts that may result from the development of the sites as they are abandoned. Basic information, such as the zoning for the consolidated well sites, is not even included in the IS/MND even though this information is readily available. If a direct change in the physical environment will cause another change in the environment, the secondary effect must be evaluated as an indirect effect of the project. (CEQA Guidelines, § 15064(d).) CEQA review is also needed to consider the growth-inducing changes resulting from the City’s proposed actions to discourage and force the termination of existing oil production operations. (, § 15358(a).) Yet the IS/MND fails entirely to consider these impacts.

A CEQA document must describe the physical environmental conditions in the vicinity of a proposed project as they exist at that time. This environmental setting will normally constitute the baseline physical conditions by which a lead agency will determine whether a project may have a significant impact on the environment. Without a comparison of existing baseline physical conditions to the conditions expected to be produced by a project, an initial study or EIR will not inform decision makers and the public of the project’s significant environmental impacts, as CEQA mandates.

VI The Oil Ordinance is Not Consistent with the City’s General Plan

The Conservation Element of the City’s General Plan states that petroleum is a non-renewable resource and so impacts to this resource must be evaluated under CEQA:

Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted... CEQA requires that impacts on non-renewable mineral resources be evaluated relative to proposed development projects... Petroleum is a non-renewable resource

(Conservation Element at II-57, 58, 63.⁸) The Oil Ordinance must be consistent with the General Plan, such that “[t]he various land uses authorized by the ordinance are compatible with the objectives, policies, general land uses, and programs specified in such a plan.” (Gov. Code, § 65860 (a)(ii).) The “constitution for all future developments” is the general plan. ((1990) 52 Cal.3d 553, 570.) Before adopting the Ordinance, the City must evaluate properly the Oil Ordinance’s consistency with the General Plan.

VII The Oil Ordinance Interferes with E B’s Contractual Relations

Both the U.S. and California Constitutions prohibit the enactment of laws effecting a “substantial impairment” of contracts, which applies to public contracts as well as contracts between private parties. (

(2020) 9 Cal.App.5th 1032, 1074.) E&B has contracts with various private parties, which impose obligations on E&B. The Oil Ordinance will impair these contracts by making it significantly more difficult to maintain its existing wells, which will undermine E&B’s reasonable expectations under the contracts. E&B has several leases with the City for its oil and gas operations, and the expanded definition of oil well maintenance under the Oil Ordinance will result in a breach of those leases.

VIII The Oil Ordinances Leaves the City Vulnerable for Damages Under the Civil Rights Act

The federal Civil Rights Act, 42 U.S.C. § 1983 (“Section 1983”), provides a cause of action for damages based on claims arising from violations of federal rights. ((2018) 138 U.S. 1815, 1822.) The adoption of the Oil Ordinance will significantly impair E&B’s constitutional rights, including its right to just compensation and due process rights. Accordingly, if the City adopts the Oil Ordinance as proposed, specifically in relation to well maintenance, the City will place itself at significant risk of liability under Section 1983, including for payment of damages suffered as a result of unreasonably phasing out oil well maintenance, and consequently, oil and gas production in the City.

For all of these reasons, we urge the Commission to reject the November 2025 Oil Ordinance and IS/MND.

Sincerely,



Matthew C. Wickersham

⁸ https://planning.lacity.gov/odocument/28af7e21-ffdd-4f26-84e6-dfa967b2a1ee/Conservation_Element.pdf

December 9, 2025

VIA EMAIL ONLY

cpc@lacity.org

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

Re: *Council File No. 17-0447-S2; CPC-2025-2884-CA (December 11, 2025 CPC Meeting, Agenda Item 10); Warren's Second Submission Opposing Proposed Oil and Gas Drilling Ordinance*

Honorable Commissioners:

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

Due Process Requires the CPC to Delay Consideration of the Oil Ordinance and MND

There can be no question that Warren has been, and currently is, an interested party in the City's potential adoption of the Oil Ordinance and its associated environmental review. Indeed, Warren successfully challenged the prior oil ordinance (which is substantially similar to the proposed Oil Ordinance) and secured a Court ruling, judgment and writ in its favor (collectively, the "Prior Orders"). The City has included Warren on all communications to interested parties relating to the City's efforts to reenact the Oil Ordinance following AB3233, including stakeholder meetings required by the Prior Orders, but did not inform Warren that this case had been scheduled for the CPC's December 11, 2025 meeting until December 4, 2025, three days after the December 1, 2025 deadline for Initial Submissions. (See Exhibit A hereto.) The City also did not inform Warren until December 4, 2025 that it had changed the form of the Oil Ordinance from what it had previously released in September 2025, or that it had published the associated proposed Mitigated Negative Declaration ("MND") and posted it to the City's website on the Thanksgiving Holiday (November 27, 2025). (*Id.*) There is no excuse for the City's notice delay as the Oil Ordinance is dated November 2025 and the MND was posted in November 2025. Yet

the City's calculated timing meant that Warren was deprived the opportunity to submit a fulsome Initial Submission of unlimited pages by the December 1 deadline.

The following City on-line resources also were not updated prior to the Initial Submission deadline to advise Warren and other stakeholders that this case would be coming before the Commission at its December 11 meeting:

- Planning Department case search for CPC-2025-2884-CA does not reflect this case being scheduled for any meeting before the Commission. (See Exhibit B hereto, screen shot as of December 2, 2025, which information remains the same today.)
- Planning Commission case hearing search for this matter as of December 2, 2025, does not include this case. (See Exhibit B hereto, screen shot as of December 2, 2025.)
- The City's dedicated webpage for the Oil Ordinance—the purpose of which is to inform the public about the Oil Ordinance and procedural developments—does not even identify the December 11 Commission meeting, nor does it provide the version of the Oil Ordinance before the Commission for approval (Exhibit A to Staff Report) and instead lists the prior version from September (Exhibit B to Staff Report). (See Exhibit B hereto, screen shot as of December 2, 2025, which remained the same as of today; <http://www.planla.org/plans-policies/oil-and-gas-drilling-ordinance.>)

Initial Submissions are the only meaningful opportunity to submit evidence to the Commission on the Oil Ordinance as they are not limited as to the number of pages. Secondary Submissions are limited to 10 pages including exhibits. The City denied Warren and other stakeholders a fair opportunity to submit such evidence by failing to advise them before the December 1 deadline for Initial Submissions of the December 11 Commission meeting along with the version of the Oil Ordinance to be considered and of the City's posting of the MND.¹

Warren further reiterates that it is inappropriate to recommend that the City Council approve the Oil Ordinance and MND while the comment period on the MND is pending. The Commission may not recommend adoption by the City Council until the CEQA review process is complete and all public comments have been received and considered, certainly no sooner than the close of the public comment period on the MND of December 29, 2025.

The City Revised the Oil Ordinance After the Second Stakeholder Meeting, Thereby Prohibiting the CPC from Considering the Oil Ordinance at this Time

The City will violate the Prior Orders if it considers the Oil Ordinance at the Commission's December 11, 2025 meeting. The Prior Orders require the Planning Department to take certain action before the Commission can consider the Oil Ordinance:

¹ Indeed, Warren was the only party to submit an Initial Submission and its submission was limited due to the City's lack of timely notice. Warren only learned of the Commission hearing through its counsel searching through pending City ordinances on the City's website on Sunday, November 30, 2025, leaving just one day to draft an Initial Submission based on its vague understanding of what the Commission might be considering.

The Department shall publicly release the contents of the proposed New Ordinance prior to the second stakeholder meeting. The second meeting shall occur at least 15 days in advance of the presentation of a draft New Ordinance to the City Planning Commission.

(Exhibit B to Initial Submission at ¶6.) As explained above, the Planning Department did not release the revised contents of the Oil Ordinance until it issued the Staff Report on December 2, 2025, less than 15 days prior to the December 11 meeting and *after* (not before) the Second Stakeholder meeting.

While the Planning Department released a document that it portrayed to be the “proposed New Ordinance” (Exhibit B to Staff Report) on September 17, 2025, in advance of the October 1, 2025 Second Stakeholder meeting, the Staff Report reflects that the Commission is being asked to approve a different “proposed New Ordinance” (Exhibit A to Staff Report) that was not released to the public until the December 2 Staff Report, long after the October 1, 2025 Second Stakeholder meeting. Advance release of the Oil Ordinance to Warren (and the other parties to the Prior Orders) was required so that (among other reasons) they had sufficient time to meaningfully review the Oil Ordinance and submit comments on the same prior to consideration by the Commission. The City deprived the parties of that opportunity by failing to comply with the Prior Orders and, instead, blindsiding them with a revised “proposed New Ordinance”—one that Warren could not fully comment on as part of its Initial Submission because it was not released by the City until after that deadline.

To be clear, Initial Submissions were due on December 1, 2025, the day prior to the City releasing the Oil Ordinance in the December 2, 2025 Staff Report. Warren’s December 1, 2025 Initial Submission was thus, by definition, based on the prior version of the Oil Ordinance provided to Warren and other stakeholders on September 17, 2025. The Staff Report, however, explains that revisions were made after that date and the form of the Oil Ordinance had changed such that it was now a completely different document attached as Exhibit A to the Staff Report, with the prior version provided on September 17, 2025 being attached as Exhibit B to the Staff Report. The Staff Report does not even provide a redline comparison of the two versions. The City did not provide this new document to Warren (or others) as required by the Prior Orders, nor did it provide this new document to Warren and other stakeholders in November, even though it was in existence in November given that the Oil Ordinance in Exhibit A to the Staff Report bears that date.

These tactics not only violate the Prior Orders but they also violate the due process rights of Warren and others. It is thus unlawful for the Commission to consider the Oil Ordinance at its December 11, 2025 meeting. Consideration must be delayed until the City complies with the Prior Orders by holding a Second Stakeholder meeting on the Oil Ordinance attached as Exhibit A to the Staff Report and allowing more than 15 days thereafter before the Commission meets so that the Commission can consider complete comments from all stakeholders prior to taking action on the Oil Ordinance.

The Oil Ordinance is Further Preempted by SB 1137 and AQMD Rules

In addition to the preemption issues raised in Warren’s Initial Submission, the Staff Report demonstrates that the Oil Ordinance also is preempted by SB 1137. SB 1137 is a state law

providing that CalGEM shall have the discretion to decide whether to allow new drilling and certain maintenance operations within defined health protection zones “to prevent or respond to a threat to public health, safety, or the environment.” The Oil Ordinance seeks to deprive the State of this power by allowing the Zoning Administrator to determine whether there is a health and safety reason for such operations to proceed through a proposed Health & Safety Exception process. (Staff Report at A-11 (“Operators must secure authorization through a separate zoning review process (administered by the Office of Zoning Administration) to justify the necessity and scope of the work.”).) In simple language, the Ordinance impermissibly prohibits or regulates maintenance and the consideration of health, safety and environmental factors, which authority has been reserved by the State through CalGEM, not granted to the City. For the reasons explained in Warren’s Initial Submission, AB3233 does not give the Zoning Administrator the authority to trump the State’s decisions on these matters of statewide concern.

The Oil Ordinance also seeks to regulate and restrict maintenance activities by specifically incorporating the type of activities regulated not only by the State and CalGEM, but also the SCAQMD. The SCAQMD has extensive rules regarding the air quality concerns that the City purportedly seeks to address by way of the Oil Ordinance. (*See, e.g.*, SCAQMD Rules 1148.1 and 1148.2.) “The Legislature has designated regional air pollution districts as the primary enforcers of air quality regulations.” (*So. Cal. Gas Co. v. So. Coast Air Quality Mgmt. Dist.* (2012) 200 Cal.App.4th 251, 269.) And in fact, these rules are actively implemented and enforced by the SCAQMD. The Oil Ordinance thus further improperly seeks to prohibit activities that are comprehensively regulated by the SCAQMD. “If the preemption doctrine means anything, it means that a local entity may not pass an ordinance, the effect of which is to completely frustrate a broad, evolutionary statutory regime enacted by the Legislature.” (*Fiscal v. City and County of San Francisco* (2008) 158 Cal.App.4th 895, 914–915.)

The City Has Not Met the Findings for Adoption of an Urgency Ordinance

The Oil Ordinance is drafted as an Urgency Ordinance under Section 253 of the Los Angeles City Charter (*see* Section 22 of the Oil Ordinance, page 34), but the Staff Report does not include any findings to support such urgency. Section 253 provides that, “An urgency ordinance may only be adopted if required for the immediate preservation of the public peace, health or safety. Any urgency ordinance shall contain a specific statement showing its urgency, and must be passed by a three-fourths vote of the Council.” There is no evidence, let alone substantial evidence, of an urgent need for the Oil Ordinance and thus, it should not be approved as one. Indeed, when the prior oil ordinance was adopted, there was no urgency and there has been no showing of a change since then. Moreover, the urgency language in the Oil Ordinance speaks to the “continued existence and operation of oil and gas extraction activities, particularly in close proximity to residential areas, schools, and other sensitive land uses, [as] pos[ing] a credible, immediate, and ongoing threat to the public health, safety, and general welfare of Los Angeles residents,” but the Oil Ordinance does not prohibit such operations at this time, further demonstrating that there is no urgency. Warren’s operations surely do not create such an urgency given its low emissions as documented by the Yorke reports referenced in Warren’s Initial Submission. The Oil Ordinance thus should not be recommended for approval as an urgency ordinance.

The Oil Ordinance Constitutes a Taking, Not a Legitimate Exercise of Police Powers

As explained in Warren’s Initial Submission (as well as numerous times before), the Oil Ordinance will effect an unconstitutional taking of Warren’s real property rights (and the property rights of its royalty owners) for which the City must compensate Warren. The Staff Report improperly contends that the Oil Ordinance is a “land use regulation—not an act of eminent domain” and “a legitimate exercise of the City’s inherent police power” (Staff Report at A-20.) The Oil Ordinance, however, is *not* a land use regulation. Rather, like the prior oil ordinance, and like Measure Z at issue before the California Supreme Court in *Monterey*, the Oil Ordinance attempts to ban the drilling of new wells and to prohibit maintenance of existing wells by using land use and zoning as a pretext “to do indirectly what [it] cannot do directly.” (*Chevron U.S.A. Inc. v. County of Monterey* (“*Monterey*”) (2023) 15 Cal.5th 135, 142.) By its express terms, operators cannot continue existing operations under the Oil Ordinance because maintenance is prohibited absent a Health and Safety exception. To claim otherwise demonstrates the City’s lack of understanding of the activities it attempts to regulate. The Oil Ordinance will impede existing production, removing it from the sphere of land use and zoning and putting it squarely within takings liability.

The Oil Ordinance also is not a legitimate exercise of police power for the separate and distinct reason that it is arbitrary, capricious, lacking in evidence, contrary to public policy, and does not serve a compelling state interest. By way of example, the Staff Report and Oil Ordinance fail to counter Warren’s evidence of the low emissions of its all-electric operations. Nor does the City establish that any of the alleged harms actually stem from local oil and gas operations, or put forth evidence that Warren’s operations otherwise result in the negative health impacts the City attributes to oil and gas operations generally (*see* Initial Submission at pages 9-10).

The Oil Ordinance also fails to account for, or even acknowledge, the recent change in state law and policy encouraging the responsible extraction and production of oil and gas to meet consumer and refining demands, including through SB 237 (allowing the State to approve up to 2,000 state permits per year for oil wells in Kern County). The City has failed to properly consider all likely impacts of the Oil Ordinance, including social impacts of job loss and the impacts of accelerated plug and abandonment work and increased oil imports to meet consumer demand when faced with diminished local supply.

Ultimately, the City fails to justify the Oil Ordinance as a reasonable exercise of police powers and fails to establish any nuisance conditions that the Oil Ordinance would prevent. For these reasons, the City exceeds any purportedly legitimate police power or zoning authority it might have to promulgate reasonable zoning ordinances. (*See Beverly Oil Co. v. Los Angeles* (1953) 40 Cal.2d 552.)

The Oil Ordinance is Impermissibly Vague and Ambiguous

City laws and ordinances must be clear, precise, definite and certain in their terms so that their precise meaning can be ascertained. Statutes which either forbid or require the doing of an act in terms so vague that people of common intelligence must necessarily guess at their meaning and differ as to their application, violate due process of law. (*Zubarau v. City of Palmdale* (2011) 192

Cal.App.4th 289, 308.) Here, the proposed Oil Ordinance is vague and ambiguous for numerous reasons including as described herein.

First, at a high level, the Staff Report provides: “The New Zoning Code (Chapter 1A) already includes policy and provisions that were integrated during the effective period of Oil Ordinance No. 187,709. The policy intent and provisions of Chapter I were translated into Chapter 1A on June 18, 2025, under CF 22-06172. As such, oil and gas is comprehensively structured across several key Articles in Chapter 1A: Article 1 (Introductory Provisions), Article 5 (Use), Article 8 (Specific Plans, Supplemental & Special Districts), Article 12 (Nonconformities), and Article 14 (General Rules).” It is not clear what the City intends with this statement nor is it clear how the Code is being amended, especially given the revisions to the New and “Old” Zoning Codes and all of the style and format changes that are generically referenced without showing specific amendments.

Additionally, the Oil Ordinance describes the amortization period as 20 years, which the City claims utilizes an already-established time-period for the phase-out of oil production in order to justify imposing the 20-year timeline (*see, e.g.*, Staff Report at A-4 “deliberately drawn from established precedent”). Yet the City also “continues to analyze the feasibility of a shorter timeline through parallel work streams across multiple City departments.” (*Id.* at A-19.) The fact that the City, by its own words, is putting forth an ordinance that will force oil operations to cease within 20-years, but is simultaneously considering a shorter timeframe through *unspecified* “parallel work streams” across multiple *unspecified* City departments is outrageous, violates due process, and renders the Oil Ordinance unconstitutionally vague and ambiguous. At a minimum, operators are entitled to know at what point their long-established operations will be forced to shutter. More than that, they are entitled to notice and an opportunity to respond, which is impossible if unknown City departments are considering ways to shorten the amortization period and the Oil Ordinance gives the City the discretion to adopt such a reduction.²

In the same breath, the Staff Report indicates that the City expects existing oil operations to continue as usual, including maintenance activities, during the phase-out. “However, all existing activities must comply with the proposed regulation against expansion which explicitly prohibits new drilling, maintenance, redrilling, and deepening.” (*Id.* at A-13.) This too, is impermissibly vague.

The Oil Ordinance Conflicts with the City’s General Plan

Government Code § 65300.5 requires that the general plan and its elements comprise an integrated, internally consistent and compatible statement of policies. A zoning ordinance must be compatible with the objectives, policies, general land uses, and programs specified in the general plan. (Gov. Code § 65860(a).) These requirements extend to the City. (Gov. Code § 65860(d); *City of Los Angeles v. State of California* (1982) 138 Cal.App.3d 526.)

² Ironically, the City has already commissioned and received numerous amortization studies to consider a phase out of oil and gas, yet makes no mention of those studies in the Staff Report, MND or otherwise.

The Staff Report acknowledges that the Oil Ordinance may potentially conflict with the Objective and Policy 1 in the Conservation Element of the City's General Plan, but attempts to sweep the conflict aside by claiming that the Oil Ordinance will eventually "preserve the petroleum product in place" after giving ample time to support a transition to renewable energy. (Staff Report at F-2, F-3.) However, the General Plan's focus is not limited to only conserving natural resources, but also to the wise extraction of them as well. As the Staff Report acknowledges, the General Plan "encourages the conservation *and orderly extraction* of non-renewable resources, including petroleum, where appropriate." (*Id.* at F-3, F-4 (emphasis added).) Indeed, the Conservation Element sets out a policy to: "conserve petroleum resources and *enable appropriate, environmentally sensitive extraction* . . . and to reduce the city's dependency on imported petroleum and petroleum products." (Page II-64 of Conservation Element of City of Los Angeles General Plan (emphasis added).) By prohibiting new wells and restricting maintenance of existing wells, forcing the eventual end of oil operations, the Oil Ordinance directly and impermissibly conflicts with this stated policy of the General Plan.

The City is Illegally Piecemealing Required Environmental Review

CEQA review must account for the whole project, and "[a]gencies cannot allow environmental considerations to become submerged by chopping a large project into many little ones." (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222 (internal citations omitted).) There is no doubt that the Oil Ordinance is part of a larger regulatory scheme to ban oil operations within the City that will unquestionably include (for example) the following, the environmental effects of which are not fully evaluated in the MND and Staff Report: (a) well plugging and abandonment and site remediation³ and redevelopment;⁴ (b) the time period for phasing out oil operations since the Oil Ordinance provides an undetermined time period (providing the City discretion to set the same),⁵ while the City at the same time is evaluating the same issue elsewhere through City-commissioned amortization studies (see Council File No. 17-0447); (c) maintenance operations under a Health and Safety exception process in the Oil Ordinance that contemplates continued routine maintenance operations that are not evaluated;⁶ and (d) adoption of a parallel 2025 ZAI (which is the subject of a pending appeal by Warren) banning the same maintenance activities covered in the Oil Ordinance with no environmental review of the new 2025

³ "While site remediation and cleanup are overseen by state and regional agencies, including CalGEM and the State Water Board, ensuring specialized oversight when sites are permanently abandoned, the City is also examining site cleanup and remediation policies through separate Council instruction (Council File No. 21-1395)." (Staff Report at A-19.)

⁴ "Lastly, it would be speculative to determine any future use that might occur on these sites. At the time when any well sites are considered for redevelopment, including well sites in M3 zones or those located on Cortese List, those actions would undergo additional environmental review in accordance with CEQA." (MND at 87.)

⁵ "The City reserves its discretion to alter or shorten this 20 year period, or otherwise abolish uses, at any oil, gas, or hydrocarbon well site." (Exhibit A to Staff Report, Section 17 of Oil Ordinance at 27 (discussing 12.5.4.A.1(e)).)

⁶ "During this phase-out period, well sites are anticipated to continue operating and undergo routine operations, including . . . Well Maintenance (i.e., well re-casing or maintenance acidization), similar to historical and existing practices," (Staff Report at A-12-A-13), but those historical and existing practices are not analyzed in the MND or Staff Report.

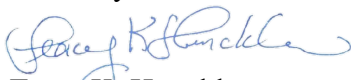
ZAI and absolutely no discussion or mention of it in the Oil Ordinance or MND.⁷ All of these activities are part of the larger, reasonably foreseeable project of banning oil operations within the City and all must be evaluated now as a single project under CEQA. (*See id.*)

Contrary to the City's Own Past Practices and State Law, the City Has Improperly Excluded Oil, Gas and Other Hydrocarbons from the Common-Sense Definition of "Mineral Resources" in CEQA

In an effort to avoid the obvious impacts to the availability of mineral resources that will result from the City's campaign to ban oil production through the Oil Ordinance (and other piecemeal efforts discussed above), the City attempts to claim that oil, gas and petroleum resources are not "mineral resources" and thus the impact to their availability need not be analyzed under CEQA. This argument not only flies in the face of common sense but also long-standing State law and the City's own prior interpretations that analyzed oil and gas as "mineral resources" under CEQA, including when it adopted the old oil ordinance. California law is clear that minerals include oil, gas and other hydrocarbons. For example, mineral deposits reserved to the State include oil, gas and other hydrocarbons, as well as a long list of other substances. (Pub. Res. Code § 6407.) Similarly, for real property assessment purposes, state law defines "mineral rights" as including the right to enter the land for development and production of "minerals, including oil, gas and other hydrocarbons." (Rev. & Tax. Code § 607.5.) Simply put, the City must analyze the potential environmental impacts of the Oil Ordinance (and other piecemealed efforts) on the availability of mineral resources, which will require a finding that there is a potentially significant environmental impact requiring the preparation of an EIR. As discussed in the Initial Submission, this was the same conclusion reached by the County of Los Angeles in its consideration of similar restrictions to those in the Oil Ordinance. (See Exhibit C to Initial Submission.) There is no evidence in the City's record justifying a different CEQA conclusion than what the County decided—that an EIR is required to analyze the reasonably foreseeable impacts this type of restrictive ordinance can have on the environment.

The Oil Ordinance will undoubtedly impact the availability of mineral resources in the City and the State, resources which the State has acknowledged are important and vital at this time. The City, which is not facing a current urgency, should take the appropriate and necessary time to evaluate the environmental ramifications of its decision rather than attempting to rush a hasty approval without adequate analysis. For all these reasons and those contained in the prior submissions to the City by Warren and other industry participants, Warren urges the Commission to not take action on the Oil Ordinance and MND at this time and ultimately to deny approval of the Oil Ordinance.

Sincerely,



Tracy K. Hunckler

⁷ The Staff Report vaguely refers to comments requesting the reissuance of the old ZAI as "relat[ing] to a separate policy matter that has since been addressed" (Staff Report at A-19.) The "separate policy matter" may be a reference to the new 2025 ZAI but the City does not disclose it as such, nor does it evaluate the new 2025 ZAI.

EXHIBIT A

From: Los Angeles City Planning <planning.oildrilling@lacity.org>
Sent: Thursday, December 4, 2025 3:31 PM
To: Tracy Hunckler <thunckler@daycartermurphy.com>
Subject: Proposed Oil Ordinance at CPC on December 11th and Draft MND Available | Propuesta de la Ordenanza Petrolera en CPC el 11 de diciembre y el Borrador de MND Disponible

Proposed Oil and Gas Drilling Ordinance

Ordenanza Propuesta de Perforación de Petróleo y Gas

Para español siga hacia abajo.

Dear Interested Parties:

On September 17, 2025, Los Angeles City Planning released an [initial draft](#) of the proposed Oil and Gas Drilling Ordinance (Ordinance) in response to the [City Council](#)

[instruction](#) as well as an accompanying [Fact Sheet](#) outlining frequently asked questions and a summary of key provisions.

Since then, City Planning has taken significant steps to advance the Ordinance. A revised version of the proposed Ordinance is available for public review [here](#) (see Exhibit A within the staff recommendation report).

The revised version of the proposed Ordinance, dated November 2025, includes 1) clarifying language to the proposed text in Sec. 3 and Sec. 17 of the Ordinance which amends Section 12.23 C,4(a)(5) of Chapter I and Section 12.5.4, of Division 12.5, of Article 12 of Chapter 1A of the LAMC, respectively, 2) correcting the amendment instruction citation found in the Sec. 12 of the Ordinance which amends Section 8.2.4, of Division 8.2, of Article 8 of Chapter 1A of the LAMC, 3) adding style and formatting clauses as the new Sec. 20 necessary to publish the Ordinance in Ch 1A, and 4) adding an urgency clause as the new Sec. 22 of the Ordinance.

Additionally, on November 26, 2025, a [Mitigated Negative Declaration](#) (MND) which analyzes potential impacts on the environment for the proposed Ordinance was released (please see *Environmental Case Number ENV-2025-2885-MND*). The MND is available for public review and comment and can be accessed on our Department's [website](#). The comment period will end on **December 29, 2025**. Please submit your written comments (and include *Environmental Case No. ENV-2025-2885-MND*) via email or mail by 4 p.m. on **December 29, 2025** to the following addresses:

City of Los Angeles Department of City Planning

Attn: Lilian Rubio

200 North Spring Street, Room 701

Los Angeles, CA 90012

planning.oildrilling@lacity.org

Beyond the MND comment period, general public comments are also welcomed until the proposed Ordinance is adopted by City Council.

The staff recommendation report and revised version of the proposed Ordinance are scheduled for the December 11, 2025 City Planning Commission (CPC) meeting starting at 8:30 a.m. The meeting will take place at Los Angeles City Hall, John Ferraro Council

Chamber, 3rd Floor, Room 340, 200 North Spring Street, Los Angeles, CA 90012. This meeting may also be available virtually. The agenda for this CPC meeting is available at planning4la.org/about/commissions-boards-hearings and will include the most up-to-date information on how to attend and submit comments directly to the CPC.

All interested persons are invited to attend the meeting where you may listen, and/or present testimony regarding the project. Please note that the CPC may take action at the meeting to make a recommendation to the City Council on the proposed Ordinance and accompanying environmental clearance.

If you have any comments, questions, or would like to be added to the interested parties list, please email planning.oildrilling@lacity.org or mail correspondence to:

City Planner Lilian Rubio, Los Angeles City Planning

200 North Spring Street, Room 701

Los Angeles, CA, 90012

Thank you for your continued interest in the Oil and Gas Drilling Ordinance.

Estimadas partes interesadas:

El 17 de septiembre de 2025, el Departamento de Planeación de la Ciudad de Los Angeles (Departamento de Planeación) publicó un [borrador inicial](#) de la Ordenanza de Perforación de Petróleo y Gas (Ordenanza) propuesta en respuesta a la [instrucción del Consejo de la Ciudad](#), así como una [Hoja Informativa](#) adjunta que describe preguntas frecuentes y un resumen de las disposiciones clave.

Desde entonces, el Departamento de Planeación ha tomado medidas importantes para avanzar con la Ordenanza. Una versión revisada de la Ordenanza propuesta está disponible para revisión pública [aquí](#) (ver Anexo A en el informe de recomendaciones del personal).

HI IT

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Case Information & Documents - Los Angeles City Planning

Case Summary & Documents

Case Number

Ordinance

Zoning Information

CPC Cards

ZA Cards

Case Number:

CPC-2025-2884-CA

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05/20/2025

Assigned Date:

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Staff Assigned:

LILIAN RUBIO

Hearing Waived / Date Waived :

No

Hearing Location:

Hearing Date :

CPC Action:

CPC Action Date:

End of Appeal Period:

Appealed:

No

BOE Reference Number:

0

Case on Hold?:

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Primary Address:

Address

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Project Description:

A Code Amendment to reinstate a citywide Oil & Gas Drilling Ordinance pursuant to AB 3233 that prohibits new oil & gas extraction and phases out existing activities as nonconforming uses in all zones.

Applicant:

Representative:

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Commissions, Boards, and Hearings | Los Angeles City Planning

12/11/2025

4230 North Saltillo Street

South Valley Area Planning Commission Agenda Package

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12/11/2025

ZA-2023-1206-ZAD-DRB-SPP-MSP-HCA-1A

4230 North Saltillo Street

Hearing Notice South Valley Area Planning Commission

Date	Case Number	Address	Notes	Agenda
12/11/2025		2930 - 2936 South Sepulveda Boulevard; 1015 West 21st Street; Citywide;	CPC Meeting Agenda	 https://f
12/11/2025	CPC-2024-5548-DB-PR-HCA	2930 S. Sepulveda		
12/11/2025		20338 West Keswick Street 2131 West Jefferson Boulevard	South Valley/ South LA ZA Hearing Agenda	 https://f
12/11/2025	ZA-2024-3664-ELD-HCA	20338 West Keswick Street		
12/11/2025	ZA-2024-7062-CUB	2131 West Jefferson Boulevard		
12/10/2025	CPC-2021-2020-DB-CDP-SPPC-MEL-HCA	1410 Main Street		

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Oil and Gas Drilling Ordinance | Los Angeles City Planning

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City Services (<https://myla311.lacity.org/>)

City Directory (<https://lacity.gov/directory>)

Oil and Gas Drilling Ordinance

On Sept. 17, 2025, per City Council instruction (https://cityclerk.lacity.org/online/docs/2024/24-1466_misc_CA.pdf), Los Angeles City Planning released a proposed Oil and Gas Drilling Ordinance per Assembly Bill (AB) 3233 for public review and feedback (linked below under Documents).

Following the Sept. 6, 2024 trial court ruling in Warren E&P, Inc. v. City of Los Angeles and the City Council's action to rescind the 2022 Oil and Gas Drilling Ordinance No. 187,709 (https://clerk.lacity.org/online/docs/2017/17-0447-S2_ord_187709_1-18-23.pdf), the proposed ordinance would amend the Los Angeles Municipal Code (LAMC) to reinstate the previously adopted policy relative to oil and gas drilling activity.

Given the known hazards to public health and safety, the proposed ordinance would prohibit new oil drilling districts and disallow the expansion for the intensification of wells.

The proposed ordinance is anticipated to go before the City Planning Commission (CPC) in fall 2025 where a recommendation will be made to the City Council for consideration at a future date.

In the meantime, the Department will be hosting a stakeholder meeting to discuss the proposed oil and gas drilling policies for the City of Los Angeles, informed by Assembly Bill (AB) 3233. This stakeholder meeting will take place as an opportunity to go over the proposed ordinance, ask questions, and provide your

<https://planning.lacity.gov/plans-policies/oil-and-gas-drilling-ordinance>

1/4

Emissions from Natural Seeps and Orphaned Wells are Orders of Magnitude Greater than Fugitive Emissions from Production Equipment in Southern California

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Abstract

Parts of Southern California hold more recoverable oil per acre than anywhere else in the world. However, over the past 50 years, there has been a groundswell of opposition to continued domestic oil and gas development in Southern California, in part based on studies that have identified environmental, safety, global warming, and social justice issues associated with fugitive emissions from active oil and gas production. Discussions of emissions from oil and gas production in Southern California often overlook natural hydrocarbon seeps. However, Southern California hosts some of the largest, most emissive natural seeps in the world (e.g., Coal Oil Point in the Santa Barbara Channel and the La Brea Tar Pits in Beverly Hills). These surface seeps are associated with large oil and gas fields and are linked via fluid-transmissive faults to deeper oil and gas reservoirs. In many of these Southern Californian oil fields, drilling began over a century ago, with some fields containing dozens of improperly constructed orphaned wells that could act as additional leak pathways to the surface. Beyond emitting climate-warming greenhouse gases and reactive organic gasses, emissions from natural seeps can negatively impact the environment by polluting the ocean, contaminating waterways, and enhancing wildfires. Based on a review of existing studies, we estimate that emissions from natural seeps and orphaned well leaks are currently one to two orders of magnitude greater than fugitive emissions from production equipment leaks in Southern California. Reducing the volume of hydrocarbons in the reservoirs feeding these seeps is the only method shown to markedly decrease their occurrence and emission rates.

Introduction: Seeps and Historical Oil Production in Southern California

Southern California—defined in this paper to be Los Angeles, Orange, as well as offshore and onshore Santa Barbara and Ventura counties—hosts some of the most prolific oil and gas fields in the world. In the first half of the 20th century, oil derricks lined Southern California's beaches and covered much of downtown Los Angeles (Figure 1). A USGS study (Gautier et al., 2012) indicated that there are between 1.4 and 5.6 billion barrels of recoverable oil within the Los Angeles Basin's 10 largest fields, and that many older fields still have considerable reserves.



Figure 1: The Los Angeles City Oil Field near Echo Park circa 1895. Photo courtesy of California History Room, California State Library, Sacramento.

Many early California oil and gas fields were discovered based on natural tar seeps. The first successful oil well in Los Angeles was “dug” in 1892 by Edward Doheny in the Echo Park District using a whittled eucalyptus trunk as a drill bit. Doheny had been directed to the area by a man driving a cart with tar on its wheels as it drove through seeps. This well produced 45 barrels of low gravity oil and set off development of the Los Angeles City Oil Field (Franks and Lambert, 1985).

In early California oil fields such as Salt Lake, Santa Fe Springs, Los Angeles City, and Beverly Hills, hundreds of undocumented wells were drilled haphazardly prior to the implementation of a state well-record keeping system in 1915. These early wells were constructed without surface casing and were typically abandoned without plugging prior to the implementation of stricter statewide regulations in 1929. Many of these old, orphaned, and often undocumented wells are substantial contributors to methane emissions (Boutot et al., 2022). Today, many of these wells cannot be located, let alone remediated, and they function as anthropogenic seeps.

Natural seeps have impacted humans in Southern California since the last ice age. The Chumash tribe historically used natural bitumen to waterproof their boats over 10,000 years ago, enabling them to navigate to the Channel Islands, and later to line water bottles and other items. Episodic seep-generated hydrocarbons in the environment may also have contributed to negative health outcomes among the Chumash, potentially leading to loss of stature and population decline at certain points in history (Leifer, 2019; Wärmländer et al., 2011).

Seeps were noted during Portola's 1769 expedition in Southern California. (Van Blossom, 2016). Portola's fellow explorer Juan Crespi remarked that

“the explorers saw some large marshes of a certain substance like pitch; they were boiling and bubbling, and the pitch came out mixed with an abundance of water. They noticed that the water runs to one side and the pitch to the other, and that there is such an abundance of it that it would serve to caulk many ships”

Offshore oil slicks in the Santa Barbara Channel were seen by Admiral Vancouver (Vancouver, 1801) in his 1790 exploration of the California coast:

“the surface of the sea, which was perfectly smooth and tranquil, was covered with a thick, slimy substance, which when separated or disturbed by a little agitation, became very luminous, whilst the light breeze, which came principally from the shore, brought with it a strong smell of tar, or some such resinous substance”

Flammable methane vents have historically posed safety hazards. The father of Ralph Lloyd—the geologist who discovered the giant Ventura Avenue Field—was nearly killed when he sought refuge from a brush fire that was ignited by a lightning bolt. He ran to a patch of ground devoid of vegetation—caused by one of many methane vents in the area—which then burst into flames. He barely escaped with his own life while his horse unfortunately burned to death (Franks and Lambert, 1985). During the Thomas fire in 2017, smoldering seeps were difficult for firefighters to extinguish (Martinez 2017). Natural seeps in Upper Ojai have also been associated with significant streambed contamination (Figure 2) as dozens of seeps in this region flow into Sisar Creek and its tributaries (California Department of Fish and Game, 2008).



Figure 2: Streambed contaminated with natural seep oil in the Upper Ojai region of Ventura County. Photo courtesy of Joseph Silvi.

Oil seeps and methane vents continue to persist in urban Southern California, largely because only a fraction of the region's underground oil and gas has been extracted. These natural methane vents can be dangerous and are often misinterpreted as infrastructure leaks. In 1985, more than 20 people were injured in an explosion in the basement of a department store in the Fairfax District west of Downtown Los Angeles and was attributed to methane gas which accumulated under the department store. It was determined that the likely cause was a combination of natural seeps and orphaned wells venting methane into the store's basement area (California Curated, 2023). A study by the Environmental Defense Fund (EDF) identified numerous methane leaks throughout Los Angeles; however, when SoCal Gas investigated, they found that many were not due to any infrastructure or distribution line leaks but rather were natural in origin (Newton, 2016).

In this paper we investigate the relative contribution of fugitive emissions from natural seeps and orphaned well seepage to present day fugitive emissions from oil and gas production equipment in Southern California.

Geology of Oil and Gas Generation, Migration, and Seeps in Southern California

Southern California is geologically unique in both structure and composition. Active tectonics combined with Miocene deposition of organic-rich sediments has produced source rocks that, upon burial and lithification, generate hydrocarbons. These hydrocarbons underpin world-class petroleum accumulations and drive the extensive natural seepage and hydrocarbon

venting observed at the surface. The Monterey Formation is the predominant source for California's abundant oil and gas resources as well as its seeps (Beckwith, 2013).

Figure 3 depicts the generation, migration, reservoir trapping and partial leaking of oil and gas to the surface in Southern California. The Monterey Formation—including its Nodular Shale unit—was deposited as organic-rich marine shales and siliceous facies throughout the middle to late Miocene (approximately 17 to 5 Ma), during which time the Pacific–North American plate boundary evolved from subduction to strike-slip motion. Upwelling along the California margin and sediment-starved deep basins promoted exceptionally high total organic carbon (TOC) in fine-grained sediments that, upon burial and lithification, serve as the principal source rocks for Southern California's petroleum accumulations (Behl, 1999). Notably, those same siliceous shales and cherts of the Monterey Formation are often the producing reservoir—making it one of the few formations globally to act as both source rock and productive reservoir (Popov et al., 2001).

Total organic carbon (TOC) in the Monterey Formation can be as high as 23% (34% organic matter by weight), more than ten times the TOC of most source rocks (Popov, et al., 2001). Oil generation extends from burial depths between 3 km and 6 km and cracking into lighter hydrocarbons starts at about 5 km (Popov, et al., 2001). Kerogens in the Monterey Formation are sulfur-rich, oil-prone and relatively immature. Oil dated as young as 0.5 Mya has been produced, and hydrocarbon generation is ongoing. Reservoir filling occurred over the past 200,000 years (Jung, et al., 2015). As an active petroleum generation province, Southern California has high heat flow and the subsurface often exhibits high pore pressures which do not decline with production as rapidly as other more mature basins (Jung, et al., 2015). These high pore pressures may enhance fluid migration and seep rates.

As shown in Figure 3 and 4, oil and gas fields in Southern California are often found along major fault systems and associated with fault flower structures, which also serve as pathways for surface seeps. Flower structures often have a main surface fault trace with macro-seeps along it, although macro-seeps can also be found at other faults intersecting the surface within the flower structure. Diffuse seepage (Etiope, et al., 2019) are also likely to occur between the faults. Flower structures typically coalesce into a main fault zone beneath the surface which is often associated with major earthquakes. The Newport-Inglewood and Whittier Faults have experienced major earthquakes in the past century at depths between 5 km to 10 km.

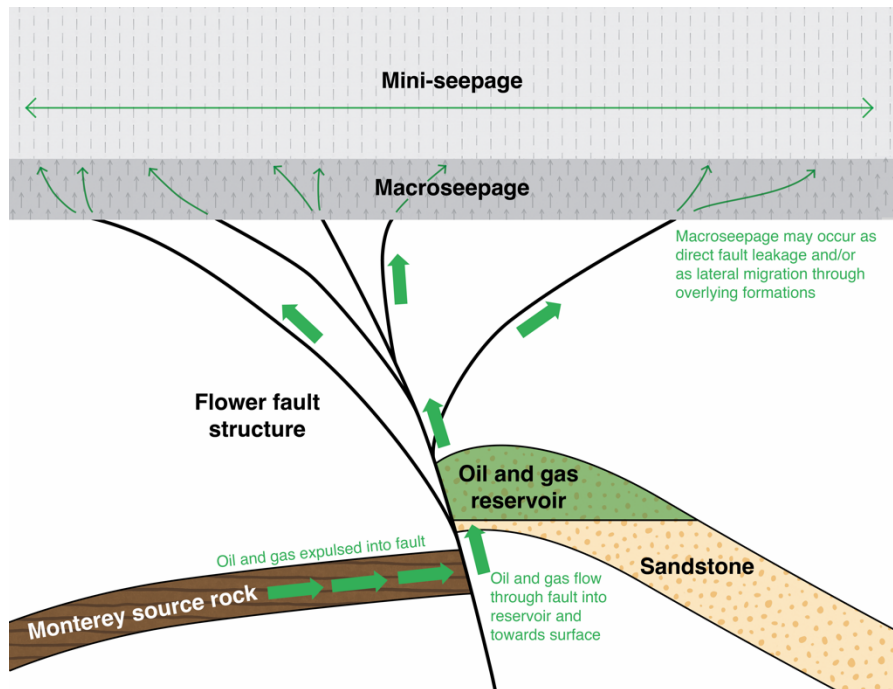


Figure 3: Hydrocarbon generation in the Monterey Formation and subsequent migration via faults into oil and gas reservoirs. In many cases, these reservoirs are bounded by faults and/or internally faulted, which may provide a leak path to the surface.

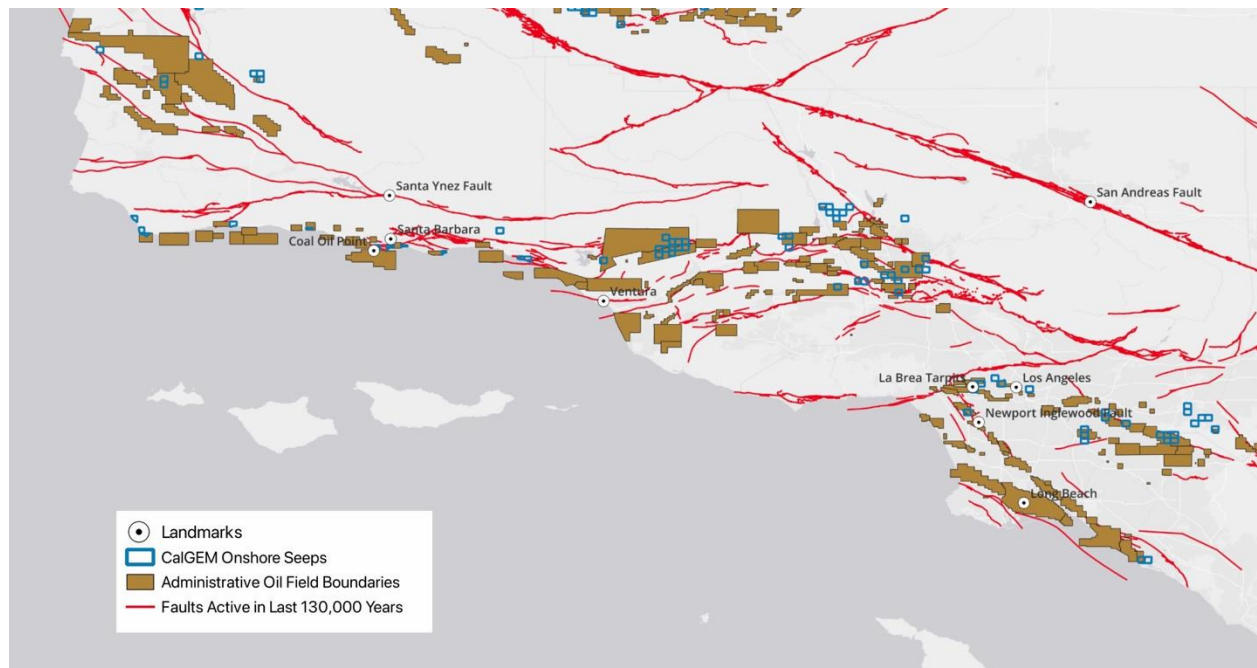


Figure 4: Oil seeps, surface fault traces and oil and gas fields in Southern California.

Studies of Methane Emissions from Seeps in Southern California

- Natural hydrocarbon seeps typically occur above faulted oil and gas fields (Leifer, 2019). Local macro-seeps (e.g. Etiope, et al., 2019) can emit methane at rates exceeding 1kg/hr. Macro-seeps are infrequently found in nature, with fewer than 4,000 identified worldwide (Etiope, et al., 2019). Diffuse seepage (Etiope, et al., 2017) occurring between and around macro seeps contribute three times more than point source macro-seeps to global emissions (Etiope, 2019), due to the large surface area from which they can originate. Along with methane, seeps often emit light alkanes—such as ethane, propane, *i*-butane, *n*-butane, *i*-pentane, and *n*-pentane. These non-methane hydrocarbons are chemically reactive and contribute to urban and regional ozone formation (Weed, et al., 2020).

Extremely large, short-duration hydrocarbon ‘eruptions’ have also been documented in the geologic record. Foschi, et al. (2020), combined 3D seismic data and fluid flow modeling to identify one such ‘eruption’ above a North Sea gas field that emitted an estimated 39-241 Tg of methane in less than 1 year during the Pliocene Epoch. Offshore 3D seismic data suggest that historical seeps like this are often present above oil and gas fields (Jablonski, et al., 2013).

La Brea Tar Pits

The La Brea Tar Pits (LBTP) in Beverly Hills, California, are a well-known tourist attraction with extensive tar, asphaltum, oil, methane and other reactive organic gas seepage that has been extensively studied. Hydrocarbons emitted by the seeps there originate from deeper reservoirs within the Salt Lake Oil Field that underlie the LBTP and migrate upwards to the surface along the 6th Street Fault. (Farrell, et al., 2013; Weber, et al., 2017; Etiope, et al., 2017).



Figure 5: Methane bubbles and oil from a natural seep along a fault system in one of the many McKittrick Brea Pits of Kern County, California. Photo courtesy of Joseph Silvi.

The LBTP have the highest methane flux measured onshore in North America, with cumulative methane emissions rates around $1,600 \pm 500$ kg/day from the tar pits and surrounding park (Etiope, et al., 2017). The emissions from the LBTP and seeps in the surrounding area account for a considerable amount of Los Angeles Basin seep emissions. Farrell et al. (2013) estimated methane emissions of around 167,000-250,000 kg/day from a ~ 95 km² area centered on the LBTP and extending from Downtown Los Angeles toward the Los Angeles International Airport (LAX).

The LBTP sit at the southwestern edge of the Salt Lake Oil Field which was discovered in 1906 and developed with dozens of undocumented and unplugged wells. Consequently, the emissions from areas around the LBTP are likely to be a combination of natural seeps and orphaned well leaks. One method to distinguish anthropogenic leaks from natural seeps is by using the isotopic ratio of methane and other heavier alkanes such as ethane and propane (Molofsky, et al., 2025). In general, natural seep gas is expected to take longer to travel to the surface, allowing more chemical alteration, and resulting in more variability in surface chemistry. In addition, natural seeps typically have higher proportions of lighter hydrocarbons. While this observation appears to be true at many locations in the park around the Tar Pits proper, samples taken outside the park at the corner of Wilshire Boulevard and Curson Avenue exhibited methane/(ethane+propane) and propane/ethane ratios that were comparable to samples taken from the reservoir. The chemical similarities between this location and the deep reservoir, suggest that this location may be the site of an undocumented orphaned well from early drilling at the Salt Lake Field (Etiope, et al, 2017).

Coal Oil Point

The Coal Oil Point Field (Figure 7) located offshore in the Santa Barbara Channel may be the most studied seep system in the world (Hornafius, et al., 1999; Leifer, 2019; Leifer, et al., 2021; Leifer, 2023; and Boles, et al., 2023). Coal Oil Point (COP) has some of the highest seep rates in the world—two orders of magnitude greater than the largest Gulf of Mexico rates (Leifer, 2019). The seeps in this area emit around 40,000 kg/day of methane, 19,000 kg/day of reactive organic gasses (ROGs) and several hundreds of barrels of oil per day (Hornafius, et al., 1999).



Figure 6: Oil and gas seeping onto the beach from the Monterey Formation at Tar Pits Park in Carpinteria along the Santa Barbara Coast. Long term production of oil and gas from reservoirs underneath the Santa Barbara Channel has slowed seepage. Photo courtesy of Joseph Silvi

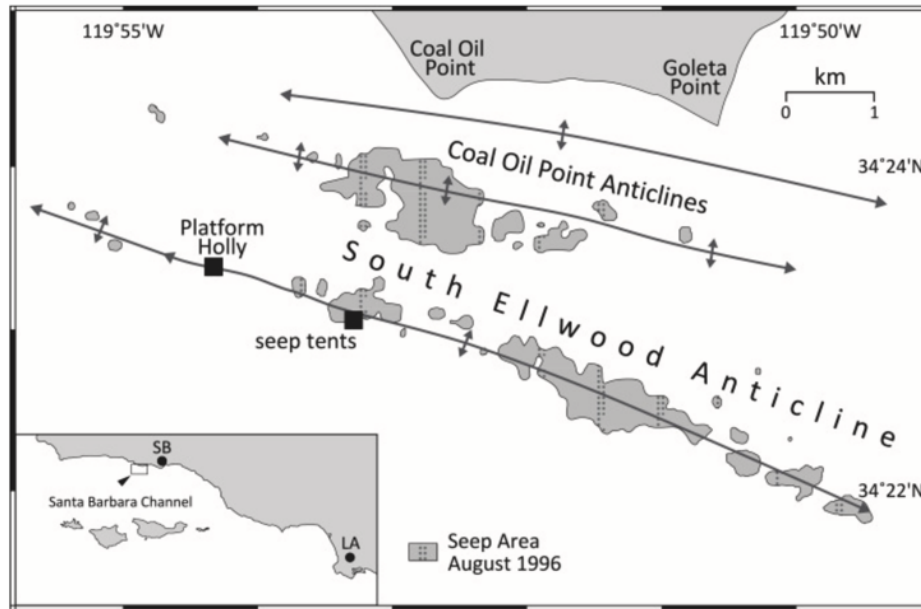


Figure 7: Map of Coal Oil Point and South Ellwood Anticlines along with seep tent locations (taken from Boles, et al., 2023).

Decades of study about seep rates at Coal Oil Point (COP) (see Quigley et al, 1999; Leifer, 2019, and Boles et al., 2023 for a far more in-depth summary) have led to several important conclusions about seep behavior and variability:

1. Very high levels of ROGs are present in the seeps, suggesting high permeability fault paths from the reservoir to the surface.
2. Regional seep rates can vary by an order of magnitude over multi-decade timescales.
3. Seep rates are affected by a wide range of factors including but not limited to oceanic conditions (i.e. tides and currents) and subsurface geological parameters such as pressure, temperature, fluid saturation, formation stress, permeability, and porosity.
4. Oil and gas production can cause short-term increases or decreases in seep rates locally, typically over periods of less than a decade and in localized areas.
5. Over longer timescales (decades), hydrocarbon production has significantly reduced seep rates. Hydrocarbon withdrawal at rates far greater than recharge is the primary reason for long term seep rate reduction rather than pressure depletion.

The last observation is consistent with other studies in Southern California. In the Santa Maria Basin, historical records indicate that seep activity near the Orcutt oil field declined following decades of production, likely due to subsurface pressure drawdown (Fischer, 1977). Similar patterns were inferred in the Ventura Basin, where local observations suggest diminished oil and gas seepage in mature fields such as Ventura Avenue and Torrey Canyon.

Other Seep Studies in California

Some California oil fields do not have high natural methane emission rates. Mellqvist, et al., (2022), made individual wellhead emissions measurements in Kern County's Lost Hills Field, finding an average wellhead emission rate of 0.008 kg/day/wellhead for alkanes and methane combined. This was confirmed by atmospheric emissions measured above the field at roughly 35 kg/day, which would require around 4,000 wells, roughly-matching the number that were operating at the time of the study.

In contrast, parts of the Upper Ojai region in northern Ventura County, which has been producing oil for over 160 years, historically exhibited more visible natural seepage; however, the 103 individual macro-seeps identified here only emit around 10 kg/day of methane within the Upper Ojai region (Duffy, et al., 2007) versus around 40,000 kg/day at Coal Oil Point. Presumably, rates were significantly higher in the 19th century prior to oil extraction as the volume and pressure of hydrocarbons in the subsurface was greater.

Equipment-Related Methane Emissions from Current Oil and Gas Production in the South Coast Air Basin

The South Coast Air Basin (SoCAB), managed by the South Coast Air Quality Management District (SCAQMD), includes Los Angeles, Orange, and the non-desert parts of Riverside and San Bernardino Counties. In 2022, SCAQMD reported that oil and gas production facilities in the SoCAB emitted about 3,300 kg/day of methane, based on quarterly inspections identifying equipment leaks exceeding 500 ppm (SCAQMD, 2022).

To better estimate total emissions from production equipment in the SoCAB, we considered threshold updates in SCAQMD's 2024 amendments. If all minor leaks were reported, SCAQMD's assessments suggest that approximately 80% more emissions would be detected. This implies that current emissions from production equipment in the SoCAB may be around 6,000 kg/day of methane.

It is important to note that numerous prior studies comparing bottoms-up equipment-related emissions to top-down studies (e.g., Rutherford, et al, 2017, Alvarez, et al, date) have shown that bottoms up approaches typically underestimate overall equipment related emissions by a factor of 1.5 to 2.1. Rutherford, et al (2017) attribute most of this underestimation to the inability of bottoms-up approaches to capture super emitters. While a top-down approach can capture super emitters that bottoms-up approaches miss, top-down approaches may not be able to separate seep and abandoned well leak emissions from production equipment emissions and therefore may overestimate overall well pad emissions in Southern California.

Top-Down and Bottom-Up Estimates of Natural Seep and Orphaned Well Emissions in the SoCAB

Top-Down

Peischl, et al., (2013) used the following methodology to estimate overall methane emissions in the SoCAB and attribute them to different sources:

“...we use ambient measurements in the SoCAB taken in May and June 2010 aboard the National Oceanic and Atmospheric Administration (NOAA) P-3 research aircraftto derive CH₄ emissions from the SoCAB.....(and) further examine CH₄ emissions from landfills and dairy farms in the SoCAB identified in the bottom-up CH₄ inventories reported by Hsu et al. [2010] and Wennberg et al. [2012]. We then expand on these previous studies by examining light alkane emissions from Los Angeles area data sets. In addition to CH₄ and ethane, we examine propane, n- and i-butane, and n- and i-pentane measurements to derive emissions of each of these light alkanes in the SoCAB, and use them in a system of linear equations to further quantify the source apportionment of CH₄ in the L.A. basin. “

Peischl , et al, (2013) estimated 1,120,000±110,000 kg/day in overall methane emissions within the SoCAB, of which 498,000±147,000 kg/day came from landfill, wastewater treatment, and dairy emissions and 526,000±148,000 kg/day from the combination of natural seeps and natural gas distribution/storage system leaks. These two factors were not broken out in the Peischl study, but we can estimate natural gas distribution/storage system leak emissions from studies by Washington State University and SoCal Gas (SoCal Gas, 2025). These studies found leak rates between 0.05% and 0.12% for SoCal Gas storage and distribution infrastructure Approximately 60% of SoCal Gas’ 21.8 million customers reside within the Los Angeles Basin (SoCal Gas, 2024) resulting in approximately 12,950 kg/day to 31,100 kg/day of estimated methane leaks and a mean estimate of 22,000 kg/day.. Subtracting 22,000 kg/day in distribution system methane leaks from Peischl’s 526,000 in combined distribution system leaks and natural seeps results in a mean estimate of 504,000 kg/day for natural seeps (and orphaned well leaks), a minimum of 356,000 kg/day, and a maximum of 652,000 kg/day.

Bottom-Up

There are no detailed field measurements of seep- and abandoned well-related emissions throughout Southern California. Even if detailed measurements of emissions were made along faults and in areas with known abandoned wellbores there are many unknown faults, diffuse emissions zones, and unknown well locations as well as potential surface sources would create

substantial uncertainty in emissions estimates. Our bottoms-up approach uses detailed measurements in the area around the La Brea Tar Pits (LBTP), which we assume are the largest source of seep-related emissions in Southern California. Emissions measurements in this area represent a lower bound on Southern California seep-related emissions.

Overall methane emissions from the La Brea Tar Pits (LBTP) and nearby environs were estimated to be $1,600 \pm 500$ kg/day (Etiope, et al., 2017). Scaling this value by a factor of three (Etiope, et al., 2019) to approximate the additional contribution of diffuse methane emissions in the area results in an estimated $4,800 \pm 1,500$ kg/day from an area of about 0.04 km^2 .

Farrell, et al, (2013) used an air ram mounted on the front of a Recreational Vehicle (RV) while driving late at night to measure methane and CO₂ emissions in a 95 km^2 area around the LBTP, extending from Downtown Los Angeles toward LAX. They estimated methane emissions of 167,000- 250,000 kg/day, with an average of 208,500 kg/day. This area encompasses several old oil fields (Los Angeles City, Salt Lake, Beverly Hills, Cheviot Hills, and Inglewood) many of which were discovered based on natural seeps. These fields were drilled over 100 years ago and contain hundreds of historic orphaned wells that could act as anthropogenic methane leak points (Boutot et al., 2022).

While this region is a seep and emission hotspot, it is a small fraction of the overall Los Angeles Basin which has many other oil fields. For example, the Brea-Olinda and Santa Fe Springs fields, (Figure 4) also have known seeps and hundreds of orphaned wells. Emissions and seep rates from these areas have not been quantified as they have been near LBTP, but the sheer area encompassed suggests that overall Los Angeles Basin emissions from natural seeps and historic orphaned wells are substantially larger than the 167,000-250,000 kg/day measured in the 95 km^2 area around the LBTP by Farrell, et al., 2013. Emissions in this small area (roughly 1/100 of the entire Southern California area) are about 1/3 of the entire Southern California top-down emissions derived from the work of Peischl, et al., (2013). Consequently we believe that the top-down estimate of 504,000 kg/day is ‘in the ballpark’ for overall methane emissions in Southern California and that overall Southern California methane emissions are unlikely to be less than 250,000 kg/day.

Figure 8 summarizes the top-down attribution of Peischl, et al, (2013) along with the bottoms up estimate of Farrell, et al (2013) along with the production equipment emissions

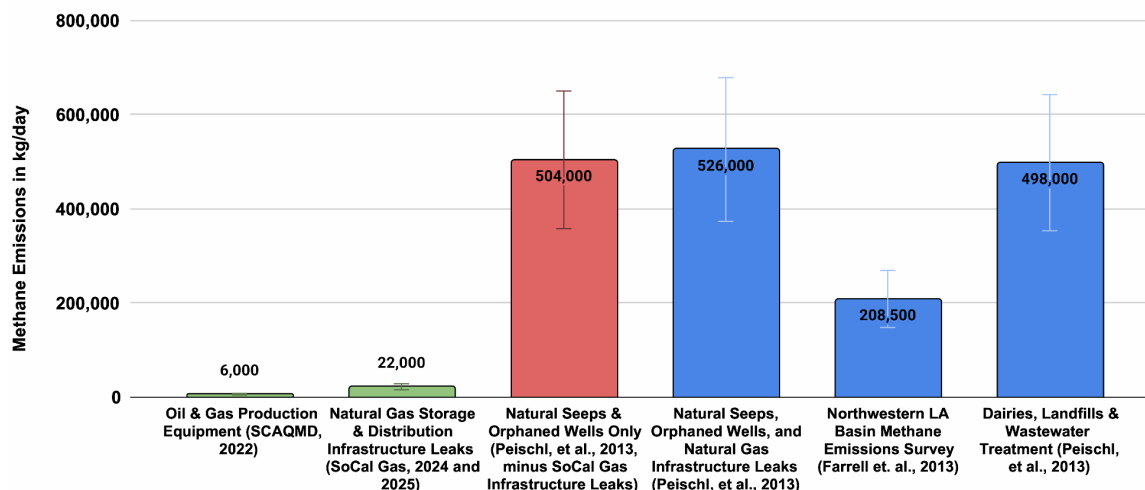


Figure 8: Estimated methane emissions from different sources within the Los Angeles Basin.

Conclusions

Equipment-related methane leaks from production facilities are estimated to be between 0.92% to 1.69% of natural seep and historic orphaned well methane emissions in the SoCAB (6,000 kg/day versus 504,000 kg/day). It is possible that Ventura and Santa Barbara counties exhibit even larger differences given the magnitude of offshore seeps in areas like Coal Oil Point with extreme levels of natural seepage.

Our estimates extend and update the work of Peischl, et al., 2013 by quantifying present-day production equipment-related emissions and natural gas distribution emissions, thereby providing better estimates of seep and historic orphaned well emissions. To our knowledge, this study is the first to directly compare natural seep emissions to production equipment emissions since more stringent regulations for fugitive methane emissions from oil and gas equipment went into effect in the past decade. Luckily, these regulations have resulted in a substantial decline in equipment emissions. Our study suggests that equipment-related emissions are now negligible when compared to emissions from natural seeps and historic orphaned wells in Southern California.

Hydrocarbon emission rates, whether due to natural seeps or due to orphaned well leaks, are related to the volume of hydrocarbons in the underlying oil and gas reservoir, which is influenced by reservoir depletion. Oil fields with less depletion will tend to have higher emissions. The only demonstrated way to reduce these emissions over time is by producing and depleting the underlying oil and gas field. In specific areas such as near the La Brea Tar Pits or near Coal Oil Point, restarting oil and gas production and depleting the reservoirs may benefit the local environment alongside reducing greenhouse and reactive organic gas emissions.

Conflict of Interest

The authors declare that they have no competing interests.

Acknowledgements

The authors thank Robert A. Harley, Giuseppe Etiope, John Harris, and Michael Mische for their informal review of the manuscript and for providing helpful comments that improved the clarity and quality of this work.

Data Availability

No new data were created or analyzed in this study. All data used were derived from existing, publicly available sources, as cited in the References. The data that support the findings of this study are available from the corresponding author upon reasonable request.

Funding

No external funding was received for this study.

References

- Beckwith, R., 2013. Mighty Monterey: California's primary petroleum source rock. *Journal of Petroleum Technology*, 13 April. <https://jpt.spe.org/mighty-monterey-californias-primary-petroleum-source-rock>
- Behl, R.J. (1999) 'Since Bramlette (1946): The Miocene Monterey Formation of California revisited', in Moores, E.M., Sloan, D. & Stout, D.L. (eds.) *Classic Cordilleran Concepts: A View from California*. Boulder, Colorado: Geological Society of America Special Paper 338, pp. 301–313. doi:10.1130/0-8137-2338-8.301.
https://www.researchgate.net/publication/284977415_Since_Bramlette_1946_The_Miocene_Monterey_Formation_of_California_revisited
- Boles, J.R., Garven, G. and Peltonen, C., 2023. Hydrocarbon production reduces natural methane seeps in the Santa Barbara Channel. *Marine and Petroleum Geology*, 151, p.106187.
<https://doi.org/10.1016/j.marpetgeo.2023.106187>
- Boutot, J., Peltz, A.S., McVay, R. and Kang, M., 2022. Documented orphaned oil and gas wells across the United States. *Environmental Science & Technology*, 56(20), pp.14228-14236.
- California Curated, 2023. Underground fury: The 1985 methane blast that rocked Los Angeles and rerouted its subways, 3 November.
<https://californiacurated.com/2023/11/03/underground-fury-the-1985-methane-blast-that-rocked-los-angeles-and-rerouted-its-subways/>
- California Department of Fish and Game, 2008. *Investigation and risk assessment of significant natural seeps in Santa Paula Creek (SSEP 2008-09)*.
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=193852&inline>
- Caplan, M., Kretzmann, H., Aguirre, C. and Naseck, K., 2022. *Oil wells leaking dangerous amounts of methane found in northeast Bakersfield near homes and elementary schools*.
<https://www.sierraclub.org/press-releases/2022/05/oil-wells-leaking-dangerous-amounts-methane-found-northeast-bakersfield-near>
- Duffy, M., Kinnaman, F., Valentine, D., Keller, E. and Clark, J., 2007. Gaseous emission rates from natural petroleum seeps in the Upper Ojai Valley, California. *Environmental Geosciences*, 14(4), pp.197–207. <https://doi.org/10.1306/eg.07110707010>

- Duren, R., Thorpe, A. and McCubbin, I., 2020. *The California methane survey*. California Energy Commission. Report No. CEC-500-2020-047.
<https://www.energy.ca.gov/sites/default/files/2021-05/CEC-500-2020-047.pdf>
- Etiope, G., et al., 2017, Emission of Methane and Heavier Alkanes from the La Brea Tar Pits Seepage Area Los Angeles, *Journal of Geophysical Research: Atmospheres*.
<https://doi.org/10.1002/2017JD027675>
- Etiope, G., Ciotoli, G., Schwietzke, S., Schoell, M., 2019, Gridded maps of geological methane emissions and their isotopic signature. *Earth Syst. Sci. Data*, 11, 1-22,
<https://doi.org/10.5194/essd-11-1-2019>
- Farrell, P., Culling, D. and Leifer, I., 2013, Transcontinental methane measurements: Part 1. A mobile surface platform for source investigations, *Atmospheric Environment*, 74, pp. 422–431. <https://doi.org/10.1016/j.atmosenv.2013.02.014>
- Fischer, D.W. (1977) Subsurface and surface oil seepage, Orcutt oil field, Santa Maria Basin, California. USGS Open-File Report.
- Foschi, M., Cartwright, J.A., MacMinn, C.W. and Etiope, G., 2020. Evidence for massive emission of methane from a deep water gas field during the Pliocene. *Proceedings of the National Academy of Sciences of the United States of America*, 117(45), pp.27869–27876. <https://doi.org/10.1073/pnas.2001904117>
- Franks, K. A. and Lambert, P. F. (1985) *Early California Oil: A Photographic History, 1865-1940*. Texas A & M University Press. ISBN: 978-0890962060
- Gautier, D.L., Tennyson, M.E., Cook, T.A., Charpentier, R.R., and Klett, T.R., 2012, revised 2013, Remaining recoverable petroleum in ten giant oil fields of the Los Angeles Basin, southern California: U.S. Geological Survey Fact Sheet 2012–3120, v. 1.1, 2 p.
- Hornafius, J. S., Quigley, D. C. and Luyendyk, B. P., 1999, The world's most spectacular marine hydrocarbon seeps (Coal Oil Point, Santa Barbara Channel, California): Quantification of emissions, *Journal of Geophysical Research*, 104(C9), pp. 20703–20711.
<https://doi.org/10.1029/1999JC900148>

- Jablonski, D., Preston, J., Westlake, S. and Gumley, C.M., 2013. Unlocking the origin of hydrocarbons in the central part of the Rankin Trend, Northern Carnarvon Basin, Australia. In: M. Kepp and S. Moss, eds. *West Australian Basins Symposium*, Perth, WA. Perth: Petroleum Society of Australia, pp.1-
31. https://www.researchgate.net/publication/325439220_Unlocking_the_Origin_of_Hydrocarbons_in_the_Central_Part_of_the_Rankin_Trend_Northern_Carnarvon_Basin_Australia
- Jung, B., Garven, G. and Boles, J.R., 2015. The geodynamics of faults and petroleum migration in the Los Angeles basin, California. *American Journal of Science*, 315(5), pp.412-459. <https://doi.org/10.2475/05.2015.02>
- Leifer, I., 2019, A Synthesis review of emissions and fates for the Coal Oil Point marine hydrocarbon seep field and California marine seepage, *Geofluids*, 4724587. <https://doi.org/10.1155/2019/4724587>
- Leifer, I., Melton, C. and Blake, D.R., 2021. Long-term atmospheric emissions for the Coal Oil Point natural marine hydrocarbon seep field, offshore California. *Atmospheric Chemistry and Physics*, 21(23), pp.17607–17629. <https://doi.org/10.5194/acp-21-17607-2021>
- Leifer, I., 2023. Decadal cyclical geological atmospheric emissions for a major marine seep field, offshore Coal Oil Point, Southern California. *Scientific Reports*, 13, p.3035. <https://doi.org/10.1038/s41598-023-28067-4>
- Lloyd, R. B., “Father Saves Life In Brush Fire By Leap Into Canyon,” *California Oil World*, 21 Jan. 1926
- Martinez, C., 2017. *Smoldering oil in Upper Ojai a focus of fire crews fighting Thomas Fire*. Ventura County Star, 28 December. <https://www.vcstar.com/story/news/2017/12/28/smoldering-oil-upper-ojai-focus-fire-crews-fighting-thomas-fire/987165001/>
- Mellqvist, J., Samuelsson, J., Offerle, B., Johansson, J., Brohede, S., Andersson, P., Babore, A., Ruiz, D. and Ericsson, M., 2022. *Toxic air contaminant and greenhouse gas measurements near oil and gas operations and proximate communities*. CARB Contract 18ISD023. California: California Air Resources

Board. https://ww2.arb.ca.gov/sites/default/files/2022-09/CARB_contract_18ISD023_FinalReport_ADA.pdf

Molofsky, L.J., Etiope, G., Segal, D.C., Baldassare, F.J., Christman, M. and Roehm, P.E., 2025. Methane-rich gas emissions from natural geologic seeps can be chemically distinguished from anthropogenic leaks. *Communications Earth & Environment*, 6, p.11. <https://doi.org/10.1038/s43247-024-01990-8>

Newton, E., 2016. *Verification study of the methane mapping of four California cities by the Environmental Defense Fund and Colorado State University*. Southern California Gas Company, 19 August. https://www.socalgas.com/regulatory/documents/r-15-01-008/EDF_4-Cities_Methane_Mapping_Report_Final_081916.pdf

Paul, D.L., Asaithambi, R., Ershaghi, I., Crompton, J. and Gautier, D., 2015. Energy security in the Los Angeles Basin: A new look at an old treasure. Paper presented at the *SPE Western Regional Meeting*, Garden Grove, California, April 2015. <https://doi.org/10.2118/174029-MS>

Peischl, J. et al., 2013, Quantifying sources of methane using light alkanes in the Los Angeles basin, California, *Journal of Geophysical Research: Atmospheres*, 118, pp. 4974–4990. <https://doi.org/10.1002/jgrd.50413>

Popov, M.A., Nuccio, V.F., Dyman, T.S., Gognat, T.A., Johnson, R.C., Schmoker, J.W., Wilson, M.S. & Bartberger, C., 2001, Basin-centered gas systems of the U.S., Open-File Report 01–135 Version 1.0. Denver, Colorado: U.S. Geological Survey, U.S. Department of the Interior. <https://doi.org/10.3133/ofr2001135>

Quigley, D., Hornafius, J.S., and Luyendyk, B.P. (1999) ‘Decrease in Natural Marine Hydrocarbon Seepage near Coal Oil Point, California, Associated with Offshore Oil Production’, *Geology* (1999) 27 (11): pp. 1047–1050 [https://doi.org/10.1130/0091-7613\(1999\)027<1047:DINMHS>2.3.CO;2](https://doi.org/10.1130/0091-7613(1999)027<1047:DINMHS>2.3.CO;2)

SoCal Gas (2025). About Us. <https://www.socalgas.com/about-us/mission>

SoCal Gas (2024). Methane Emissions Map FAQ. <https://www.socalgas.com/safety/methane-emissions/methane-emissions-map->

faq#:~:text=SoCalGas%20has%20worked%20hard%20over,scientific%20journal%20in%20Mar ch%202015.

South Coast Air Quality Management District (SCAQMD), 2022, Air Quality Management Plan. Detailed Emission Inventory. https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=edcebd61_16

South Coast Air Quality Management District (SCAQMD), 2024, Proposed Amended Rule 1173 - Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants WORKING GROUP MEETING #3 JUNE 12, 2024 – 9:00. https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/par-1173/final-par-1173-wgm3.pdf?sfvrsn=731b8a61_8

Van Blossom, H. (2016) Honey talks about where Los Angeles began: Part 3. Boryanabooks. Available at: <https://boryanabooks.com/honey-talks-about-where-los-angeles-began-part-3/>.

Vancouver, G. (1801) A Voyage of Discovery to the North Pacific Ocean, and Round the World, Vol. 4, pp. 293–370. London: John Stockdale. (Online edition) Available at: <https://www.americanjourneys.org/aj-134/>.

Wärmländer, S.K.T.S., Sholts, S.B., Erlandson, J.M., Gjerdrum, T. & Westerholm, R. (2011). Could the health decline of prehistoric California Indians be related to exposure to polycyclic aromatic hydrocarbons (PAHs) from natural bitumen? *Environmental Health Perspectives*, 119(9), 1203–1207. <https://doi.org/10.1289/ehp.1103478>

Weber, D., Marquez, B.A., Taylor, C., Raya, P., Contreras, P., Howard, D., Nwachuku, I., Fusco, K., Morales, F. and Doezeza, L.A., 2016. Macroseepage of methane and light alkanes at the La Brea tar pits in Los Angeles. *Journal of Atmospheric Chemistry*, 74, pp.339–356. <https://doi.org/10.1007/s10874-016-9346-4>

Weed, B.M., Brambila, G.D. and Doezeza, L.A., 2020. Natural seepage of methane and light alkanes at three locations in Southern California. *Atmosphere*, 11(9), p.979. <https://doi.org/10.3390/atmos11090979>

December 8, 2025

Kevin Ivey
CalRoyaltyNetwork.org
c/o California Independent Petroleum Association
1001 K Street, 6th Floor
Sacramento, CA. 95814

Los Angeles City Planning Commission
c/o Lilian Rubio, City Planner
Los Angeles City Hall
John Ferraro Council Chamber, 3rd Floor, Room 340
200 North Spring Street Los Angeles, CA. 90012

RE: CPC-2025-2884-CA; CEQA: ENV-2025-2885-MND, Proposed Los Angeles City Oil & Gas Ordinance.

Dear Planning Commission:

I represent the California Royalty Network a committee of the California Independent Petroleum Association (CIPA) representing over 5,000 of the 500,000 mineral rights owners throughout the state.

Our Request:

We ask that the Planning Commission pause the approval the Oil & Gas Ordinance based on a CEQA exemption and a mitigated negative declaration. Instead, the importance of the Oil & Gas Ordinance demands that a full Environmental Impact Report be performed. A full EIR would resolve issues in dispute particularly related to purported health effects of living in proximity to oil well operations. The City of Los Angeles should follow the lead of Los Angeles County which is preparing a full Environmental Impact Report as support for its efforts to regulate oil and gas operations.

1. Health Effects of Living in Proximity to Oil Operations

The Department of City Planning Recommendation Report Dated December 11, 2025 supporting the proposed Oil and Gas Drilling Ordinance contains many material inaccuracies and misstatements regarding oil operations within the city of Los Angeles.

Among these inaccuracies are statements like: "Further, as the health impacts associated with oil and gas extraction have been made clear, the City has moved toward prioritizing the health and safety of residents over oil and gas extraction." Page 102, Planning Department Recommendation Report, December 11 2025.

In fact, there is NO evidence-based scientific consensus that proximity to oil and gas operations has any adverse health effects. There is no scientific evidence that living near an oil well hurts people.

Two important reports, one from the City of Los Angeles and another from the Los Angeles County Public Health Department makes this point:

“This report should not lead to any public panic or belief in a widespread public health crisis. There is a lack [of] empirical evidence correlating oil and gas operations within the City of Los Angeles to widespread negative health impacts.”

Office of Petroleum and Natural Gas Administration & Safety, City of Los Angeles Oil and Gas Administrator, Report to City Council, Council File No-17-0447 Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil & Gas Wells and Drill Sites., page 145. July 29, 2019

“Therefore, the epidemiological studies are not able to conclude whether or not living near oil and gas activities is associated with long-term health impacts.”

Public Health and Safety Risks of Oil & Gas Facilities in Los Angeles County, Los Angeles County Department of Public Health, February 2018, p. i

2. Proposed Oil & Gas Drilling Ordinance is a Taking of Private Property without Compensation.

The proposed oil and gas ordinance will “mandate the cessation of all nonconforming oil and gas operations within a 20-year period; [and] disallow the maintenance, expansion, re-drilling, deepening, or intensification of existing extraction activities and wells in all zones...”.

The goals of the proposed ordinance are the very definition of taking of private property by government without payment of just compensation which is prohibited by the 5th and 14th Amendments to the US Constitution. Mineral rights owners and independent petroleum producers in Los Angeles will not stand by when faced with this theft of private property by government overreach. The City of Los Angeles should plan and budget now to spend significantly on legal fees to defend the oil and gas ordinance against litigation from mineral rights owners and independent producers.

Indeed, the City of Los Angeles Petroleum Administrator in his Report to City Council, Council File No-17-0447 Feasibility of Amending Current City Land Use Codes in Connection with Health Impacts at Oil & Gas Wells and Drill Sites, July 29, 2019 concluded that implementation of a surface setback around oil operations with the same goals and policies as the proposed oil ordinance will produce “estimated cost[s] of litigation over the anticipated property takings claims to the City is expected to be at least \$1 million per year for several years to defend the City” (page 148).

Furthermore, when the city loses the property taking claims in court, as they certain will, it must be prepared to pay out substantial sums to individuals for this property taking. The Petroleum Administrator in the same 2019 report cautions the City Council to expect that “The potential cost to the City could range from \$1.2 billion to \$97.6 billion in constitutional taking by mineral rights owners of the remaining 1.6 billion barrels of recoverable oil and gas reserves.” (page 148).

3. Recommended Alternative to CEQA Exemption and Mitigated Negative Declaration for Proposed Oil and Gas Ordinance.

We recommend that the City of Los Angeles delay adoption of its proposed oil and gas ordinance. Instead, it should take the time now to conduct a full environmental impact report in support of the proposed oil and gas ordinance just as the County of Los Angeles is conducting. This strategy will allow the EIR authors to evaluate the full scope of third party health studies and to answer the question whether there is sufficient evidence-based research that proves whether living in proximity to oil and gas operations really has any health effects. There is no consensus at this time among health experts that the existing body of scientific research allows any clear conclusion.

Further, a pause now to complete a full EIR will allow time for the courts to determine the scope of the private property claims from the state’s implementation of SB 1137 based on takings claim litigation currently playing out. This will provide guidance on the extent of the exposure from takings claims that the City will face from the implementation of its proposed oil and gas ordinance.

Thank you for your consideration.

Kevin Ivey
CalRoyaltyNetwork.org

**65+ CONSTITUENTS SUBMITTED THE FOLLOWING
STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE
CITY PLANNING COMMISSION'S CONSIDERATION:**

Item 10:

Case No. CPC-2025-5392-CA

Email Message:

Dear LA City Planning Commissioners,

I live in Council District 15. I urge the City Planning Commissioners to readopt the oil phaseout ordinance and protect communities from the devastating impacts of neighborhood oil drilling. There is an overwhelming body of scientific evidence that confirms that oil drilling harms our health. The chemicals emitted from oil extraction are linked to nosebleeds, headaches, nausea, asthma, preterm birth defects, lung and other cancers, and many other health harms.

And now, with AB 3233, which reaffirms the City's right to take action to phase out drilling, the City Planning Commission can confidently move forward with readopting the oil phaseout ordinance.

We need the City to demonstrate that our health, our safety, and our future matters more than the profits of oil companies and CEOs. I am calling on the City Planning Commissioners to move the ordinance to phase out oil drilling citywide forward.

Thank you.



December 8, 2025

City Planning Commission
200 N Spring Street
Los Angeles, CA 90012

Dear City Planning Commissioners,

The STAND-LA Coalition (Stand Together Against Neighborhood Drilling - Los Angeles) is writing to urge the Commission to readopt the oil phaseout ordinance which will be heard at the December 11th City Planning Commission meeting. This ordinance is an incredibly important step in the process towards a full phaseout of oil drilling citywide. Our organizations represent frontline communities in South Los Angeles and Wilmington that have been fighting for over a decade to halt the toxic extraction of oil in our neighborhoods.

In December 2022, the Los Angeles City Council voted unanimously to approve a groundbreaking city-wide phase out of oil drilling. However, immediately after it passed, five oil companies sued the City of LA over the ordinance. Unfortunately, in September 2024, a judge ruled in favor of the oil companies and overturned the oil phaseout ordinance¹. Just weeks after the Judge's decision, Governor Newsom signed [AB 3233](#) into law. The law, which went into effect in January of this year, reaffirms the authority of local jurisdictions to regulate and prohibit oil drilling². Now, we need the City to quickly readopt the ordinance and move towards a full phaseout of this noxious land use.

An overwhelming body of scientific evidence from the past several decades confirms that oil drilling harms people's health³. The chemicals emitted from oil extraction can cause nosebleeds, headaches, nausea, asthma, preterm birth defects and other reproductive harms, lung and

¹ [Judge strikes down city of L.A.'s ban on new oil drilling - Los Angeles Times](#)

² [AB 3233 Bill Language](#)

³ ³ [Department of Conservation Geologic Energy Management Division Public Health Rulemaking](#)

other cancers, and many other health harms⁴. For instance, a study focused on resident's respiratory health near oil drilling in South LA found that living near drilling was associated with decreased lung function⁵. In other examples, a statewide study of birth outcomes linked living near active oil and gas wells with low birth weight⁶ and a different study in the San Joaquin Valley identified a higher likelihood of spontaneous preterm birth among pregnant people living near oil and gas wells⁷. This past summer, a study published in Science Advances quantified the increased mortality risks due to the oil and gas lifecycle; in California over 10,000 early deaths were due to the fine particles from oil and gas emissions and over 3,000 alone were in LA County⁸.

Communities that live close to oil drilling have consistently raised the negative impacts of this extractive practice. The STAND-LA coalition and our demand for a full phaseout of oil drilling is backed by over 7,000 grassroots supporters, over 43 Neighborhood Councils, and over 70 organizations that range from community-based, public health, environmental, unions, faith, and political groups. This past year over 1,200 individuals have joined our petition calling for the City to readopt the ordinance⁹. For over ten years, impacted communities and supporters have been calling for an end to this extractive practice that has no place in our neighborhoods.

We urge the City Planning Commission to pass this ordinance and move towards dismantling LA's oil wells as a promise to Angelenos that our health, our safety and our future matters more than the profits of oil companies and CEOs.

Sincerely,

Emma Silber, Co-Coordinator, STAND-LA Coalition

Maro Kakoussian, Director of Climate and Health Programs
Physicians for Social Responsibility - Los Angeles, Co-Chair of STAND-LA

Tianna Shaw-Wakeman, Environmental Justice Program Director
Black Women for Wellness

Wendy Miranda, Policy Associate
Esperanza Community Housing

Richard Parks, President

⁴[The Power of Persistence. Liberty Hill](#)

⁵ [Respiratory health, pulmonary function and local engagement in urban communities near oil development - ScienceDirect](#)

⁶[Living near oil and gas wells tied to low birth weights in infants - Berkeley News](#)

⁷[Living near oil and gas wells may increase preterm birth risk | Stanford Report](#)

⁸ [The health burden and racial-ethnic disparities of air pollution from the major oil and gas lifecycle stages in the United States | Science Advances; Deaths, illness from air pollution related to gas and oil hit people of color hardest. study finds](#)

⁹[Tell the LA City Council: Protect LA's Health & Safety over Big Oil's Profits - Action Network](#)

Redeemer Community Partnership

Reverend Louis Chase, Minister of Community Outreach
Holman United Methodist Church

Terra Earl, Senior Staff Attorney
Communities for a Better Environment, Co-Chair of STAND-LA

Tanya Borja, Environmental Justice Policy Associate
Strategic Concepts in Organizing and Policy Education (SCOPE)

DAY OF HEARING SUBMISSIONS



December 9, 2025

VIA EMAIL

City Planning Commission
City of Los Angeles
Email: cpc@lacity.org

RE: 2930-2936 South Sepulveda Boulevard

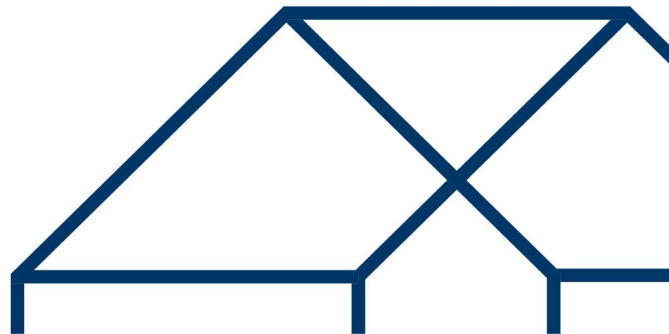
To the City Planning Commission:

Californians for Homeownership is a 501(c)(3) organization devoted to using legal tools to address California's housing crisis. We are writing regarding the project at issue in Case No. CPC-2024-5548-DB-PR-HCA. The City's approval of this project is governed by the Housing Accountability Act, Government Code Section 65589.5. For the purposes of Government Code Section 65589.5(k)(2), this letter constitutes our written comments on the project.

The Housing Accountability Act generally requires the City to approve a housing development project unless the project fails to comply with "applicable, objective general plan, zoning, and subdivision standards and criteria, including design review standards, in effect at the time that the application was deemed complete." Gov. Code § 65589.5(j)(1). To count as "objective," a standard must "involve[e] no personal or subjective judgment by a public official and be[] uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Gov. Code § 65589.5(h)(8). In making this determination, the City must approve the project if the evidence "would allow a reasonable person to conclude" that the project met the relevant standard. Gov. Code § 65589.5(f)(4). Projects subject to modified standards pursuant to a density bonus are judged against the City's standards as modified. Gov. Code § 65589.5(j)(3).

The City is subject to strict timing requirements under the Act. If the City desires to find that a project is inconsistent with any of its land use standards, it must issue written findings to that effect within 30 to 60 days after the application to develop the project is determined to be complete. Gov. Code § 65589.5(j)(2)(A). If the City fails to do so, the project is deemed consistent with those standards. Gov. Code § 65589.5(j)(2)(B).

If the City determines that a project is consistent with its objective standards, or a project is deemed consistent with such standards, but the City nevertheless proposes to reject it, it must make written findings, supported by a preponderance of the evidence, that the project would have a "specific, adverse impact upon the public health or safety," meaning that the project would have



“a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.” Gov. Code § 65589.5(j)(1)(A); Gov. Code § 65589.5(k)(1)(A)(i)(II). Once again, “objective” means “involving no personal or subjective judgment by a public official and being uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official.” Gov. Code § 65589.5(h)(8).

Even if the City identifies legally sufficient health and safety concerns about a project, it may only reject the project if “[t]here is no feasible method to satisfactorily mitigate or avoid the adverse impact . . . other than the disapproval of the housing development project . . .” Gov. Code § 65589.5(j)(1)(B). Thus, before rejecting a project, the City must consider all reasonable measures that could be used to mitigate the impact at issue.

These provisions apply to the full range of housing types, including single-family homes, market-rate multifamily projects, and mixed-use developments. Gov. Code § 65589.5(h)(2); , 200 Cal. App. 4th 1066, 1074-76 (2011). And the Legislature has directed that the Act be “interpreted and implemented in a manner to afford the fullest possible weight to the interest of, and the approval and provision of, housing.” Gov. Code § 65589.5(a)(2)(L).

When a locality rejects or downsizes a housing development project without complying with the rules described above, the action may be challenged in court in a writ under Code of Civil Procedure Section 1094.5. Gov. Code § 65589.5(m). The legislature has significantly reformed this process over the last few years in an effort to increase compliance. Today, the law provides a private right of action to non-profit organizations like Californians for Homeownership. Gov. Code § 65589.5(k). A non-profit organization can sue without the involvement or approval of the project applicant, to protect the public’s interest in the development of new housing. A locality that is sued to enforce Section 65589.5 must prepare the administrative record itself, at its own expense, within 30 days after service of the petition. Gov. Code § 65589.5(m). And if an enforcement lawsuit brought by a non-profit organization is successful, the locality must pay the organization’s attorneys’ fees. Gov. Code § 65589.5(k)(2). In certain cases, the court will also impose fines that start at \$10,000 per proposed housing unit. Gov. Code § 65589.5(k)(1)(B)(i).

In recent years, there have been a number of successful lawsuits to enforce these rules:

In , Santa Clara County Superior Court Case No. 16CV300733, the court determined that Los Gatos had improperly denied a subdivision application based on subjective factors. The court found that the factors cited by the town, such as the quality of the site design, the unit mix, and the anticipated cost of the units, were not objective because they did not refer to specific, mandatory criteria to which the applicant could conform.

, Alameda County Superior Court Case No. RG16834448, was the final in a series of cases

relating to Berkeley's denial of an application to build three single family homes and its pretextual denial of a demolition permit to enable the project. The Court ordered the city to approve the project and to pay \$44,000 in attorneys' fees.

In _____, Santa Clara County Superior Court Consolidated Case Nos. 19CV349845 & 19CV350422, the court determined that the Los Altos violated the Housing Accountability Act, among other state housing laws, by failing to identify objective land use criteria to justify denying a mixed-use residential and commercial project. The City was ultimately forced to pay approximately \$1 million in delay compensation and attorneys' fees in the case.

In _____, Orange County Superior Court Case No. 30-2019-01107760-CU-WM-CJC, a case brought by our organization, the court ruled that Huntington Beach violated the Housing Accountability Act when it rejected a 48-unit condominium project based on vague concerns about health and safety, including traffic concerns similar to those raised by comments on the project you are considering. Following the decision, the City agreed to pay \$600,000 in attorneys' fees to our organization and two other plaintiffs.

Based on the above legal framework, state law requires the City to approve this project. We have also considered the City's environmental review for the project and determined that it complied with state law. We urge you to approve the project.

Sincerely,



Matthew Gelfand



Dec 10, 2025

**City of Los Angeles
City Planning Commission
200 North Spring Street
Los Angeles, CA 90012**

**Re: Proposed Housing Development Project at 2930-2936 South Sepulveda Blvd,
CPC-2024-5548-DB-PR-HCA**

To: cpc@lacity.org

**Cc: Kyle Winston, kyle.winston@lacity.org; City Clerk's Office, clerk.cps@lacity.org;
City Attorney's Office, cityatty.help@lacity.org;**

Dear Los Angeles Planning Commission,

The California Housing Defense Fund ("CalHDF") submits this letter to remind the City of its obligation to abide by all relevant state laws when evaluating the proposed 77-unit housing development project at 2936 South Sepulveda Blvd, which includes 12 very low-income units. These laws include the Housing Accountability Act ("HAA"), the Density Bonus Law ("DBL"), and AB 130.

The HAA provides the project legal protections. It requires approval of zoning and general plan compliant housing development projects unless findings can be made regarding specific, objective, written health and safety hazards. (Gov. Code, § 65589.5, subds. (d), (j).) The HAA also bars cities from imposing conditions on the approval of such projects that would render the project infeasible (*id.* at subd. (d)) or reduce the project's density (*id.* at subd. (j)) unless, again, such written findings are made. As a development with at least two-thirds of its area devoted to residential uses, the project falls within the HAA's ambit, and it complies with local zoning code and the City's general plan. Increased density, concessions, and waivers that a project is entitled to under the DBL (Gov. Code, § 65915) do not render the project noncompliant with the zoning code or general plan, for purposes of the HAA (Gov. Code, § 65589.5, subd. (j)(3)). The HAA's protections therefore apply, and the City may not reject the project except based on health and safety standards, as outlined above. Furthermore, if the City rejects the project or impairs its feasibility, it must conduct "a thorough analysis of the economic, social, and environmental effects of the action." (*Id.* at subd. (b).)

**2201 Broadway, PH1, Oakland, CA 94612
www.calhdf.org**

CalHDF also writes to emphasize that the DBL offers the proposed development certain protections. The City must respect these protections. In addition to granting the increase in residential units allowed by the DBL, the City must not deny the project the proposed waivers and concessions with respect to average density, floor area, vehicular access, parking across C2-1VL and R4P-1 Zones; floor area ratio increase; rear yard reduction; eliminate transitional height requirement at the C2-1VL zone; and waiver of development standards to increase the building height from 45 feet to 71 feet. If the City wishes to deny requested waivers, Government Code section 65915, subdivision (e)(1) requires findings that the waivers would have a specific, adverse impact upon health or safety, and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact. If the City wishes to deny requested concessions, Government Code section 65915, subdivision (d)(1) requires findings that the concessions would not result in identifiable and actual cost reductions, that the concessions would have a specific, adverse impact on public health or safety, or that the concessions are contrary to state or federal law. The City, if it makes any such findings, bears the burden of proof. (Gov. Code, § 65915, subd. (d)(4).) Of note, the DBL specifically allows for a reduction in required accessory parking in addition to the allowable waivers and concessions. (*Id.* at subd. (p).) Additionally, the California Court of Appeal has ruled that when an applicant has requested one or more waivers and/or concessions pursuant to the DBL, the City “may not apply any development standard that would physically preclude construction of that project as designed, even if the building includes ‘amenities’ beyond the bare minimum of building components.” (*Bankers Hill 150 v. City of San Diego* (2022) 74 Cal.App.5th 755, 775.)

Furthermore, the project is eligible for a statutory exemption from CEQA pursuant to AB 130 (Pub. Res. Code, § 21080.66), which was signed into law on June 30, 2025 and effective immediately (Assembly Bill No. 130, 2025-2026 Regular Session, Sec. 74, available [here](#)) Caselaw from the California Court of Appeal affirms that local governments err, and may be sued, when they improperly refuse to grant a project a CEQA exemption or streamlined CEQA review to which it is entitled. (*Hilltop Group, Inc. v. County of San Diego* (2024) 99 Cal.App.5th 890, 911.)

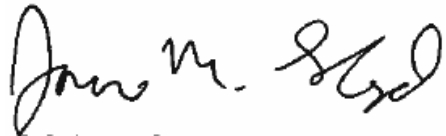
As you are well aware, California remains in the throes of a statewide crisis-level housing shortage. New housing such as this is a public benefit: by providing affordable housing, it will mitigate the state’s homelessness crisis; it will increase the city’s tax base; it will bring new customers to local businesses; and it will reduce displacement of existing residents by reducing competition for existing housing. It will also help cut down on transportation-related greenhouse gas emissions by providing housing in denser, more urban areas, as opposed to farther-flung regions in the state (and out of state). While no one project will solve the statewide housing crisis, the proposed development is a step in the right direction. CalHDF urges the City to approve it, consistent with its obligations under state law.

CalHDF is a 501(c)(3) non-profit corporation whose mission includes advocating for increased access to housing for Californians at all income levels, including low-income households. You may learn more about CalHDF at www.calhdf.org.

Sincerely,



Dylan Casey
CalHDF Executive Director



James M. Lloyd
CalHDF Director of Planning and Investigations

JEFFREY ROME, AIA

Architect | jrome@motiveis.com | 949-463-7451

December 10, 2025

Hon. Commission President and Commissioners

c/o Commission Executive Assistant
City Planning Commission

City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

RE: Submittal of 2990 S. Sepulveda, LLC in Response to Proposed Residential Project at 2930–2936 S. Sepulveda Boulevard | **Case Nos. CPC-2024-5548-DB-PR-HCA and ENV-2024-5549-SE**

Dear Commissioners,

I am writing to provide professional comments regarding the proposed six-story residential development at 2930–2936 S. Sepulveda Boulevard, located immediately north of the property at 2990 S. Sepulveda Boulevard. This building currently hosts three operational cellular carrier antenna installations that provide essential wireless coverage to the surrounding community.

I am a licensed architect with over 35 years of professional experience, specializing in the planning, design, and permitting of telecommunications infrastructure for major wireless carriers throughout California. I have personally worked on the cellular sites located on the roof of 2990 S. Sepulveda Boulevard, including design coordination, compliance assessments, and site evaluations for multiple carriers. I am extensively familiar with the antenna systems, their operational parameters, and their intended north-facing transmission paths.

Based on my direct professional experience with this site, I have significant concern regarding the interference and obstruction impacts that the proposed six-story structure will create. In particular:

- The building's height and location will physically block north-bound RF propagation from the existing antennas.
- This obstruction will result in signal shadowing, reduced signal strength, and coverage gaps within the carriers' licensed service area.
- Network capacity and reliability will be substantially degraded, especially during high-demand periods.
- New reflective surfaces may introduce multipath interference, further degrading signal quality.
- Wireless carriers may face operational and regulatory challenges in maintaining required service levels.

Because these antenna installations are permitted, operational, and essential to local wireless service, the potential for material interference must be carefully evaluated prior to approval of the proposed development. Mitigation measures such as project height modification, increased setback, or coordination with the affected carriers should be explored to avoid service degradation.

Reliable telecommunications coverage is a critical public utility supporting public safety agencies, emergency communications, and everyday community connectivity. It is in the public's best interest that the proposed development does not impair this existing communication infrastructure.

Thank you for your consideration. I am available to provide additional technical details, diagrams, or professional testimony at the Commission's request.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey Rome". The signature is written in a cursive, flowing style.

Jeffrey Rome, AIA

Architect

2692 Dow Avenue

Tustin, CA 92879

jrome@motiveis.com | 949-463-7451

December 11, 2025

VIA EMAIL: CPC@LACITY.ORG

Hon. Commission President and Commissioners
c/o Commission Executive Assistant, City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

Re: Submittal of 2990 S. Sepulveda, LLC in Response to Proposed Residential Project at 2930-2936 S. Sepulveda Blvd
Case Numbers CPC-2024-5548-DB-PR-HCA and ENV-2024-5549-SE

Dear Commissioners:

I would like to thank the CPC for the opportunity to address the proposed bonus density program development at the site of the former Bank of America at 2930 S Sepulveda Blvd.

We have owned the property at 2990 S Sepulveda Blvd. for over 31 years, transforming it from a neglected bank-owned property to a vibrant professional, medical, and wireless telecommunications center, with the later installations serving over 70% of wireless customers. Our center (the northern sector for all of our cellular carriers) provides the primary coverage for the i-405/i-10 interchange, where, on average per Caltrans, over 1 million vehicles traverse daily.

Our building's professional tenants provide vital services to the community including a unique pediatric center treating autism and autism-spectrum disorders, dentists, and pediatricians.

This transformation of the property did not magically occur – it required tremendous amounts of effort and capital on our part. Along the way, my husband and I have become senior citizens. I turn 77-years old next week. I am a metastatic cancer survivor and now with complicating visual impairment. My husband was medically retired because of complications from recurrent cancer.

When we heard of the planned proposed in-fill housing in late April 2025, we were initially happy that finally the abandoned Bank of America Building, which attracts addicts, psychotic individuals, and others whom society has left behind, would be developed into something good. We thought it would be a well thought out, harmonious development, not only with our property (the closest to the proposed project) but also to the homes behind the property. However, when we determined that the developer proposed having the city waive the height restriction from the zoned 45 feet to 71 feet, an additional 26 feet more than allowed, it immediately caused alarm. It would block our cellular tenant's transmissions (to the north of our property). This blockage of cellular transmissions, thoroughly documented in previously submitted engineering reports, interfere with public safety. As you undoubtedly know, failure of communications was a contributing factor to the horrific damage and loss of life in the recent Palisades and Eaton fires.

We later learned, from planning department documents, that the proponent of the project initially classified our center in required filings with the city to justify the proposed project that we were "...a stacked 2-story over parking garage apartment building" (undated W. Baker Report, but in the file since 2024). This error was ignored and continued to be compounded.

What we have before you today results from compounding this initial error. The developer eventually became aware of it and knew of our concerns as of May 2025, but he denied the significance of the problems with his proposed 71-foot high structure in the C2-1VL zone.

We support an infill housing development but not the one contemplated by Mr. Garikian as configured since, as already documented in the submitted reports, it creates safety issues.

After the initial May 15, 2025 hearing and around July 7, 2025, the developer has continued to mislead the City into concluding that the project had only "...perceived impacts to a telecommunications facility on the roof of a neighboring property." It begs the question that if professional engineering reports are insufficient to change a lay person's conclusion of "perceived impacts," what will?

In the recommendation report dated December 11, 2025, the city staff continues to utilize the "perceived impacts" verbiage. Once again, we have now provided several additional engineering reports demonstrating the significant impacts on cellular transmissions (northern sector). Interestingly, the applicant presented their own engineering consultant report that stated that the proposed building will not have any impact on the west, east, or southern sector wireless transmission, which is correct. We have never stated it would. The applicant's consultant did not dispute our engineer's or our carrier's findings (submitted separately) for the northern sector interference; instead, they proposed to have the carriers move to their building to deal with the acknowledged issue.

The Recommendation report states:

- There is no evidence in the record of any such specific, adverse impact occurring or of any potential violation of applicable law.
- There is evidence in the record rebutting the claims that wireless coverage and emergency response services would be impacted by project
- Request that City Planning Commission reject these claims as meritless.

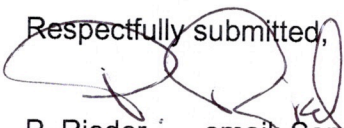
These conclusions are incorrect. We and others have now cited the impacts on transmissions in the northern sector and cited the specific violation of Federal statutes, but the city rejects these as "meritless."

As previously noted, the recent disastrous Palisades and Eaton fires, with interruption of communications being a contributing factor, this unsupported conclusion is not only wrong but dangerous.

In the last couple days, there have been discussions about possible ways to mitigate the health and safety problems and the violation of Federal statutes.

As configured, the project violates health and safety standards. The Commission should either deny the development or continue the action on this item until the parties have had an opportunity to come to a reasonable resolution.

Respectfully submitted,


P. Rieder email: Sepulveda2990@icloud.com
2990 S Sepulveda LLC



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Suite 5880
Los Angeles, CA 90071
213.557.7222
www.rpnllp.com

Todd Nelson
213.557.7225
Todd@rpnllp.com

December 10, 2025

VIA EMAIL

President Monique Lawshe and Members of the City Planning Commission
City of Los Angeles
200 N. Spring Street, Room 272
Los Angeles, CA 90012

cpc@lacity.org

Re: Case No. CPC-2024-55448-DB-PR-HCA, 2930-2936 South Sepulveda Boulevard

Dear President Lawshe and Honorable City Planning Commissioners:

This firm represents George Garikian, the applicant ("Applicant") for a new housing development project ("Project") located at 2930-2936 South Sepulveda Boulevard ("Site") in the City of Los Angeles ("City"). The Project will contain 65 new market-rate housing units and 12 new affordable housing units restricted to Very Low Income ("VLI") households.

On December 9, 2025, the Nossaman law firm ("Nossaman") submitted a letter to the City Planning Commission ("CPC") repeating their prior objections to the Project, which solely derive from the fact that the Project would be built next to existing wireless telecommunications facilities ("Existing Cell Facilities") located at 2990 S. Sepulveda Boulevard. As described in this firm's December 1, 2025 letter to the CPC ("Prior Response"), these objections are not supported by substantial evidence in the record and fail to identify any legal basis to deny or condition the Project. As further described in the Prior Response, the Project is fully consistent with local, State, and federal law, including the Housing Accountability Act ("HAA"; Government Code Section 65589.5) and State and City density bonus law ("DBL"; Government Code Section 65915 and Los Angeles Municipal Code ["LAMC"] Section 12.22 A.37).

A. The Project's DBL Waivers Will Not Result in Specific, Adverse Impacts

As described in the Prior Response, the HAA sets extremely high standards for finding a "specific, adverse impact," identification of which is required to deny a requested DBL waiver. Critically, any such impact must be based on "**objective, identified, written** public health or safety standards, policies, or conditions."¹ Nossaman's latest letter again claims that the City's previous discretionary approvals for the Existing Cell Services somehow themselves constitute "objective" standards that restrict the Applicant's ability to develop the Site. This claim is meritless – in addition to the fact that these existing City approvals are based entirely on **subjective** findings for approval and do not reference or adopt any defined, verifiable public health or safety standards, the approvals in no way reference, apply to, or purport to encumber the

¹ Government Code Section 65589.5(j)(1)(A). To be considered "objective," such standards, policies, or conditions must "involv[e] **no** personal or subjective judgment by a public official and be[] **uniformly verifiable** by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official." Government Code Section 65589.5(h)(9).

Site. As established by the HAA, these subjective site- and facility-specific discretionary approvals for another property cannot serve as objective public health or safety standards that would be pertinent to the Site or Project.

B. No Federal Law Violations Have Been Identified

Nossaman's latest letter repeats the claim that the Project's DBL waivers would violate federal law; to support this claim, Nossaman provides a partial quote of 47 U.S.C. § 332(c)(7)(B)(i)(II), which Nossaman claims prevents the City from taking "any action" that could allegedly impair the provision of wireless services. Beyond the fact that no such impairment would occur (see below and Prior Response), the full language of this federal statute, which Nossaman omits, clearly only applies to a local government's actions when acting to regulate the placement, construction, or modification of wireless service facilities, which is not occurring here. As described in the Prior Response, Nossaman's claims of alleged federal law violations are unsubstantiated.

C. Nossaman Fails to Respond to the Integer Report's Key Findings

Notwithstanding the absence of any applicable objective standards regarding the Existing Cell Services (which precludes the potential for any specific, adverse impact occurring), the Prior Response appended an expert report prepared by Integer Telecom Services, Inc. ("Integer Report"), which concluded that, even if the Existing Cell Services were fully decommissioned (which is not being proposed), the potential impacts to cell service coverage in the vicinity of the Site would be minimal, as this area already has overlapping coverage from other nearby sites.² Furthermore, the Integer Report concludes that there would be little to no impact on the City's emergency response communication capabilities due to any potential loss of signal coverage associated with the Project.³ Nossaman's latest letter objects to various other statements made by the Integer Report, but notably fails to engage with or seek to repudiate these specific expert findings that directly rebut Nossaman's allegations of Project-related impacts.

D. Subjective Standards Cannot Serve as a Basis for Project Denial

As described above and in the Prior Response, the HAA strictly limits the City's ability to deny or condition the Project, and prohibits such denial or conditioning based on subjective standards. Accordingly, Nossaman's recent claim that the Project's proposed height could be "incompatible" with existing development on adjacent properties is not pertinent under applicable law and should be rejected.

Sincerely,



Todd Nelson
Partner
of RAND PASTER & NELSON, LLP

cc: Kyle Winston, Department of City Planning
Charles Turner, Council District 5
Jennifer Torres, Council District 5

² See Integer Report (attached to December 1, 2025 Rand Paster & Nelson letter to CPC), pp. 5-6.

³ See Integer Report, pp. 2, 6.



December 9, 2025

ATTN: cpc@lacity.org and City Planning Commission (CPC)

Cc: councilmember.hernandez@lacity.org;kyle.hickey@lacity.org

Regarding: CASE NO: DIR- 2025- 688- BSA- 1A and Hearing on the issuance of a demolition permit for 1015 W. 21st Street with no HPOZ Board Review and no Certificate of Compatibility as required by the HPOZ Ordinance and the Preservation Plan.

Dear Civic Representatives -

Thank you for the opportunity to share my thoughts on the activities regarding the demolition permit issued for the 1905 bungalow (24019- 10000- 021560) at 1015 W. 21st Street, just across the street from my own home. I am a native Los Angeleno, an active community participant – living in this immediate neighborhood for over 20 years – and an engaged stakeholder. I am the director and founder of the nonprofit arts organization Velaslavasay Panorama (over 25 years old community institution) and a homeowner here in West Adams at 1044 W. 21st Street, 90007. I care so much about my neighbors, the sense of kinship we have and the diverse makeup of the residence of the blocks in this community.

I am so disheartened and angry with the way the turn of events happened with the demolition of the structure at 1015 W. 21st Street. The demolition is violation of so many points that everyone else in our neighborhood – and city – are beholden to. The issuance of the demolition permit:

- violates the University Park Preservation Plan which requires special consideration for buildings from the period of significance.
- violates the HPOZ Ordinance which requires a CCMP for any demolition.
- violates the City's Demolition Ordinance requires evaluation of the resource which is not a ministerial action.
- violates the processing requirements of the EDI Mayor's directive which excludes projects that are a variance.
- violates the goals of the South Community Plan which places a high value on preserving historic neighborhoods.
- violates permit issued splits the demolition permit from the larger project and should not be deemed ministerial.

Records show that the CPC and the ZA has the authority to enforce Section 22.2.09 wherein no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City.

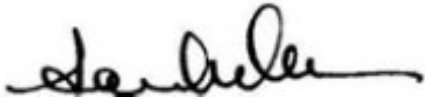
“Sec. 22.2.09 Permits Issued in Error A. Notwithstanding any other provisions of this Code or any other ordinance of the City, no permit or license shall be issued in violation of any provisions of this Code or any other ordinance of the City. B. Any permit or license issued in violation of any provision of this Code, or

any other ordinance of the City is void. Any permit or license that purports to authorize any act prohibited by any other provision of this Code or any other ordinance of the City is void.”

Based on this, the permit was issued in violation of numerous City Ordinances. These violations are not only improper with regards to city regulation, but they are also detrimental in the way this community has sustained its structural history. It was unfair what happened!

Thank you for remediating these violations in a way that will make our community and neighbors feel whole.

Respectfully,

A handwritten signature in black ink, appearing to read 'Sara Velas', with a stylized, flowing script.

Sara Velas

sara@panoramaonview.org



December 10, 2025

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

RE: Strong Opposition to Proposed Oil and Gas Drilling Ordinance (CF 17-0447-S2)

Honorable Councilmembers:

On behalf of the California Independent Petroleum Association (CIPA), whose member companies have operated *duly permitted* wells in the City of Los Angeles for generations, we respectfully but adamantly oppose the proposed Oil and Gas Drilling Ordinance.

To operate, producers must obtain numerous local, state, and federal permits. Companies invested millions of dollars based on those permits. Now, with no new scientific basis, the City is contemplating a blanket prohibition that would ban new production, prohibit essential maintenance, convert every existing well into a “nonconforming use,” and force a shutdown of all operations — even where the City itself previously found the work safe, compliant, and lawful.

That sudden reversal is not just unreasonable. It strips away long-standing rights, destabilizes critical energy infrastructure, and exposes the City to significant legal and financial consequences. More importantly, it does nothing to reduce Los Angeles’ need for petroleum. Every barrel not produced locally must be imported by foreign tankers that are completely exempt from state environmental rules and regulations, increasing emissions, increasing risks at our ports, and increasing the City’s dependence on foreign oil.

CIPA member wells have operated under CEQA-vetted permits, City zoning rules, Fire Code setbacks, SCAQMD regulation, and rigorous state oversight. The proposed ordinance disregards that entire regulatory framework.

Los Angeles can hold operators accountable without erasing vested rights or undermining its own prior permitting decisions. We urge the Council to reject the ordinance and instead pursue a path that protects public health while honoring established rights and maintaining energy reliability for Los Angeles residents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean Wallentine', with a stylized, cursive script.

Sean Wallentine
Vice President, Government Affairs
California Independent Petroleum Association (CIPA)

Large volumes of potentially recoverable petroleum in the City of Los Angeles



*View across Salt Lake oil field to the Santa Monica Mountains from Rancho La Brea.
USGS photo by Ralph Arnold. January 26, 1906.*

DonGautier L.L.C. has completed an initial evaluation of the petroleum potential of existing oil fields within the City of Los Angeles and concluded that about 1.6 billion barrels of additional oil could be produced using existing technology. At the same time, California imports more than 1 million barrels of crude oil each day, largely by tanker through the ports of Los Angeles and Long Beach.

Sixty-eight oil fields have been named in the Los Angeles basin; twenty of them are within the City of Los Angeles itself. The southern California oil accumulations, including those in L.A., are extraordinary because: (1) they exhibit what may be the world's highest concentration of crude oil in terms of volume per unit area, and (2) they happen to underlie a modern mega-city with tens of millions of inhabitants.

The exceptionally high concentration of crude oil is the geological result of a nearly ideal natural petroleum system, consisting of organic-rich source rocks, exceedingly high heat flow, abundant sandstone reservoir rocks, and large structural traps, all fortuitously formed over the past 14 million years by the complex tectonic forces that continue to shape southern California. People have used the oil in southern California since time

immemorial, but large-scale commercialization began with the waves of American migrants who arrived with the Southern Pacific Railroad. Tradition points to devel-



opment of Los Angeles City oil field in the early 1890s by Edward Doheny and Charles Canfield as the beginning of the petroleum age in L.A.

In spite of southern California's early and enthusiastic embrace of the gasoline-powered automobile, oil development and urbanization have been in conflict since the beginning. Haphazard early-day town-lot development, competing land use practices, and evolving community

standards have constrained production. As a result, recovery efficiency (the fraction of the original oil in place produced or reported as proved reserves) is low in nearly every field and many fields have been prematurely abandoned, leaving large quantities of recoverable oil behind.

In 2012, as part of a larger national project, the U.S. Geological Survey (USGS) estimated that between 1.4 and 5.6 billion barrels of recoverable oil remain in just ten L.A. basin oil fields; three of them (Inglewood, Torrance, and Wilmington-Belmont) lie partially within the L.A. city limits. The USGS did not estimate what portion of the oil was within the City of Los Angeles, nor did it estimate the volumes of recoverable oil in the other fields in the city.

The new evaluation by DonGautier L.L.C. is done in two steps: First, results of the USGS estimates of additional oil in Inglewood, Torrance, and Wilmington-Belmont fields are allocated to the areas of those fields that are within the City of Los Angeles. Second, the volumes of remaining recoverable oil in the seventeen other L.A. basin fields in the city are estimated with a methodology similar to that used by the USGS.

The original oil in place (OOIP) is calculated with a standard petroleum engineering equation: $OOIP = 7758Ah\phi(1-S_w)/Bo_i$, where A = productive area in acres, h = net thickness of the reservoir in feet, ϕ = decimal porosity, S_w = decimal water saturation, and Bo_i = the formation volume factor for oil at reservoir conditions. Data used in the evaluation are from the California Department of Conservation, the USGS, other published sources, and from DonGautier L.L.C. The potential recovery efficiency (RE-max) is estimated from recovery efficiencies modeled in engineering studies, achieved in similar reservoirs elsewhere, or indicated by laboratory results reported in technical literature. Allocations to the city are based on productive areas within municipal boundaries, modified if necessary by other considerations. Results are listed in Table 1.

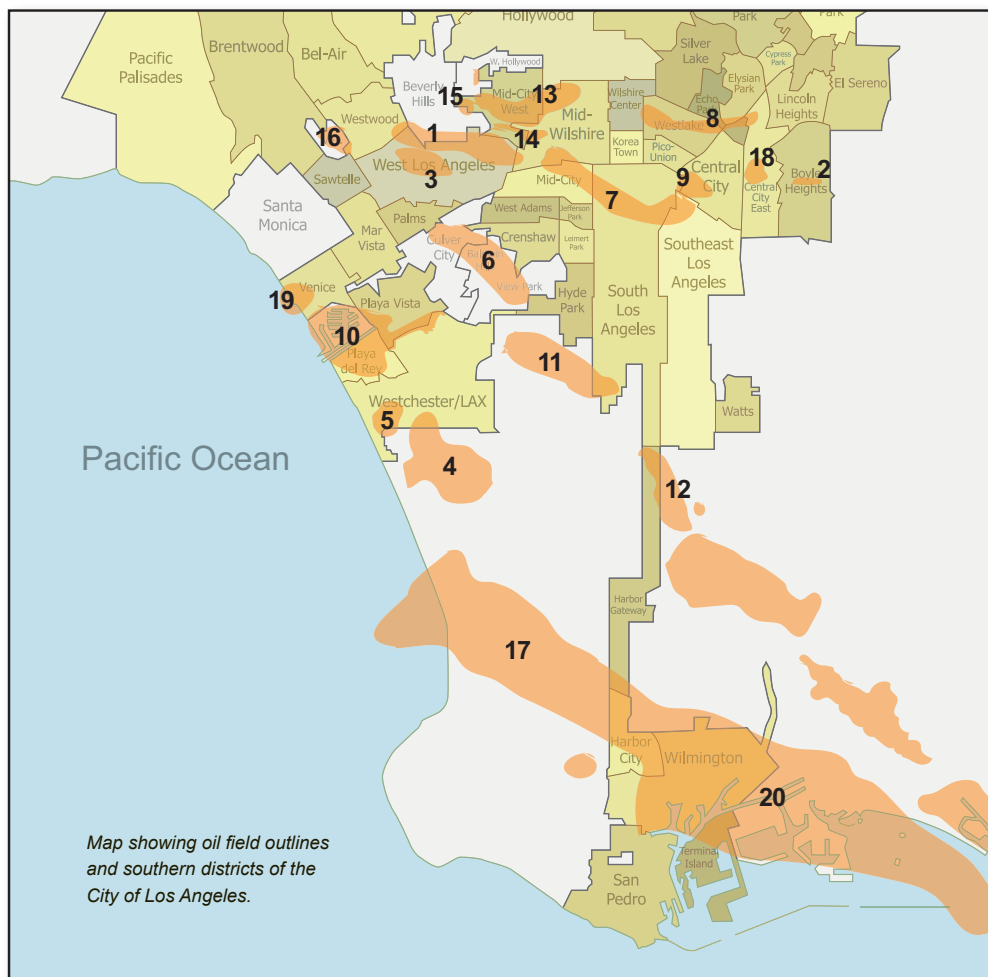


Table 1

Estimated mean volumes of recoverable oil remaining in L.A. basin oil fields located within the City of Los Angeles. (Volumes are in millions of barrels. Known oil is the sum of cumulative production and proved reserves. %RE is recovery efficiency.)

Field Name	Location on map	Known Recoverable Oil	OOIP	Current %RE	Max %RE	Additional oil	Oil in L.A.
BEVERLY HILLS	1	159	1100	14.5	40	287	230
BOYLE HEIGHTS (abd 1973)	2	0.27	22	1.2	35	8	8
CHEVIOT HILLS	3	28.1	620	4.5	35	189	189
EL SEGUNDO	4	15	75	20	35	11	1
HYPERION	5	0.96	7	13.7	30	1	1
INGLEWOOD	6	430	1400	30.7	45	250	13
LAS CIENEGAS	7	73.4	163	45	45	1	1
LOS ANGELES CITY	8	23.2	217	10.6	60	107	107
LOS ANGELES DOWNTOWN	9	15.8	48	33	35	1	1
PLAYA DEL REY (abd 1942)	10	63.5	250	25.6	30	11	10
POTRERO (abd 1996)	11	15.2	367	4.1	35	113	11
ROSECRANS	12	87	475	18.3	35	79	24
SALT LAKE	13	54	439	12.3	60	209	209
SALT LAKE, SOUTH	14	11.5	28	41.1	45	1	1
SAN VICENTE	15	28.5	1000	3	30	272	136
SAWTELLE	16	19.4	97	20	35	15	5
TORRANCE	17	232	1000	23.2	40	227	23
UNION STATION	18	2	570	<1%	30	170	170
VENICE BEACH (abd 1991)	19	3.6	27	13.3	30	5	2
WILMINGTON-BELMONT	20	2984	9000	33.2	40	973	486
Totals		4246.43	16905			2930	1628



December 8, 2025

SENT VIA EMAIL TO: cpc@lacity.org

Re: PUBLIC COMMENT, Opposition to proposed Los Angeles City Oil and Gas Drilling Ordinance, CPC-2025-2884-CA

Dear President Lawshe and Members of the Los Angeles City Planning Commission,

The California Chapter of the National Association of Royalty Owners (NARO-CA) advocates for and defends the rights of the estimated 500,000 private citizen oil and gas royalty owners in California, and even more mineral owners. We strongly oppose any efforts by the City of Los Angeles to phase out oil and gas operations or to prohibit new drilling or to further constrain existing oil production as is proposed in Agenda Item 10 on page 6 of the Los Angeles City Planning Commission (CPC) meeting agenda for December 11, 2025.

Your proposed Oil and Gas Drilling Ordinance that would ultimately shut down all oil and gas operations within the City of Los Angeles relies upon the authority purported to be given to you to do so under the terms of AB 3233. As noted in Mr. Renwick's letter, we believe that AB 3233 is in violation of the California Constitution and should not be relied upon by any California county or municipality to justify any further actions regulating oil production.

Further, we believe that oil and gas mineral and royalty rights cannot be amortized as they are depleting assets that cannot be relocated. The concept that amortization is fair and therefore constitutional is based on the idea that a nonconforming business is given a reasonable period of time so that its owner will be able to move that nonconforming business to a new location with minimal loss. This logic does not apply to oil and gas mineral rights. Oil and gas can only be produced, and the value only be realized if they are produced in the location where they were deposited by nature millions of years ago. The mineral and royalty owners' assets will have no value if they are no longer able to produce oil or gas from them. Their assets will have been taken from them by the City of Los Angeles. They will be forced to take action to protect their assets.

Founded in 1980, the National Association of Royalty Owners is the only national organization representing solely, and without compromise, oil and gas royalty owners' interests.

If forced to act, NARO-CA will stand with the royalty owners, just as we have successfully done in Monterey County, Ventura County and previously in our lawsuit against the City of Los Angeles.

When Monterey County passed the oil shutdown Measure Z, NARO-CA filed suit together with over 80 royalty owner co-plaintiffs. In addition, five oil companies filed suits. Millions were spent on legal fees and costs. We won, the County lost.

With regards to the potential for millions or billions of dollars in takings claims that might result from your contemplated actions, we draw your attention to the Judge's Intended Decision in the Measure Z case. In it he stated that **"Consequently, should it take effect, Measure Z would effect a facial regulatory taking of CRC's and some members of NARO's property."** He went on to state that **"...the remaining Petitioners would have the option of proceeding with as-applied takings claims."** However, since the court overturned Measure Z this issue was rendered moot. Remember, this judge's final decision was ultimately upheld by unanimous decisions by both the Appellate Court and the California State Supreme Court. It is now solid case law.

We believe that at this time it would be in the best interests of the taxpayers and citizens of the city of Los Angeles that you refrain from proceeding with any efforts to pursue an oil and gas phaseout and/or any further restrictions on oil production. Continuing with such actions could result in substantial expenses and liabilities for the City of Los Angeles.

Sincerely,



Edward S. Hazard
President

Cc: Edward S. Renwick, Esq.

Rosina Jacobs
1323 S. Stanley Avenue
Los Angeles
CA 90019
Email: rosjacobs@aol.com

December 9th 2025

Re: **CPC-2025-2884-CA**
CEQA: ENV-2025-2885-MND

City Planning Commission
Los Angeles City Hall
200 North Spring Street
Los Angeles, CA 90012

Dear Commissioners,

I live **in sight of the oil operation at Genesee and Pico in Wilshire Vista**. I'm asking you not to approve this ordinance as written, because it would actually make my neighborhood *less* safe.

I see this site every day. I worry about odors, leaks, and pressure issues — and what scares me most is that this ordinance would **block the routine maintenance and repairs** that keep that well safe. If operators can't re-drill, check integrity, or fix problems, the risk falls directly on families like mine who live right across the street.

And for a change this sweeping — affecting every well in the city — relying on a Mitigated Negative Declaration is unacceptable. A **full Environmental Impact Report** is absolutely needed to understand the real consequences, especially for neighborhoods like Wilshire Vista that sit right next to these sites.

Please think about the people living closest to these operations. We need stronger oversight and real safety enforcement — not rules that increase the danger and skip the environmental review we deserve.

Please don't approve this ordinance as written.

Thank you for your careful attention to this.

A handwritten signature in dark ink that reads "Rosina Jacobs". The script is cursive and somewhat informal, with the first letters of the first and last names being capitalized and prominent.

Rosina Jacobs

**30+ CONSTITUENTS SUBMITTED THE FOLLOWING
STATEMENT TO THE CPC@LACITY.ORG INBOX FOR THE
CITY PLANNING COMMISSION'S CONSIDERATION:**

Item 10:

Case No. CPC-2025-2884-CA

Email Message:

Dear LA City Planning Commissioners,

I live in Council District 15. I urge the City Planning Commissioners to readopt the oil phaseout ordinance and protect communities from the devastating impacts of neighborhood oil drilling. There is an overwhelming body of scientific evidence that confirms that oil drilling harms our health. The chemicals emitted from oil extraction are linked to nosebleeds, headaches, nausea, asthma, preterm birth defects, lung and other cancers, and many other health harms.

And now, with AB 3233, which reaffirms the City's right to take action to phase out drilling, the City Planning Commission can confidently move forward with readopting the oil phaseout ordinance.

We need the City to demonstrate that our health, our safety, and our future matters more than the profits of oil companies and CEOs. I am calling on the City Planning Commissioners to move the ordinance to phase out oil drilling citywide forward.

Thank you.

December 10, 2025

Los Angeles City Planning Commission
Re: 2025 Proposed Oil Ordinance

MY NAME IS WARREN KOURT, A RESIDENT OF THE HOLLYWOOD HILLS, COUNCIL DISTRICT 4. I HAVE BEEN INVOLVED IN THE ENERGY INDUSTRY IN CALIFORNIA AS AN ENGINEER, CONSULTANT AND EDUCATOR IN THE FIELD OF ENGINEERING, GEOLOGY, AND SUSTAINABILITY FOR OVER SIXTY YEARS AND A ROYALTY OWNER. I AM VERY FAMILIAR WITH THE INGLEWOOD OIL FIELD.

AS A ROYALTY OWNER I ASK YOU TO PLEASE PAUSE THE RUSH TO ADOPT THIS OIL & GAS ORDINANCE SUPPORTED BY A FLAWED AND INSUFFICIENT MITIGATED NEGATIVE DECLARATION. I ASK THAT THE LA PLANNING COMMISSION FOLLOW THE LA COUNTY'S LEAD AND PREPARE A FULL EIR TO SETTLE DISPUTED FACTS. THERE ARE NUMEROUS AND CONTRADICTORY STUDIES ABOUT THE LOCAL ENVIRONMENTAL AND HEALTH EFFECTS FROM THE OPERATION OF THE OIL FIELD THAT NEED TO BE ADDRESSED.

THE DRAFT OIL & GAS ORDINANCE IS A GOVERNMENT TAKING OF PRIVATE PROPERTY BY AND WITHOUT COMPENSATION. THE ORDINANCE WITHOUT A FULL EIR EXPOSES THE CITY TO LAWSUITS BY MINERAL RIGHTS OWNERS THAT THE CITY MAY LIKELY LOSE. IN HIS 2019 CITY COUNCIL REPORT, THE LA PETROLEUM ADMINISTRATOR WARNED THAT A SIMILAR OIL ORDINANCE WOULD COST THE CITY \$1.0 MILLION ANNUALLY IN LEGAL FEES. THE REPORT ALSO WARNS THAT THE CITY MUST BE PREPARED TO PAY PROPERTY TAKING CLAIMS OF OVER \$97 BILLION WHEN IT LOSES AGAINST PROPERTY OWNERS IN COURT.

ASSEMBLY BILL 3233 WHICH TURNS OVER MANAGEMENT OF OIL OPERATIONS TO LOCAL GOVERNMENTS IS NO COVER FOR THE CITY AGAINST THIS POORLY CONCEIVED ORDINANCE. CALIFORNIA OIL FIELDS ARE WELL REGULATED BY EXPERIENCED AND WELL STAFFED STATE AGENCIES. I QUESTION WHETHER THE CITY HAS THE STAFF OR EXPERTISE TO MONITOR OPERATIONS AND MANAGE THE MANY COMPLEX PROVISIONS OF THE ORDINANCE.

PLEASE PAUSE AND PREPARE A THOUGHTFUL AND FULL EIR TO PROVIDE THE SUPPORT FOR YOUR OIL & GAS ORDINANCE.

WARREN K. KOURT