

Communication from Public

Name: John P Harber

Date Submitted: 10/12/2019 05:25 AM

Council File No: 17-0447

Comments for Public Posting: Re: I oppose new proposed oil & gas setbacks I am writing to express my strong opposition to the regressive recommendations made by the Petroleum Administrator to increase setback distances and impose additional restrictions on local oil and gas production. If implemented, the proposed distances and restrictions would threaten the local economy, eliminate good-paying, middle-class jobs for thousands of Angelenos from diverse communities and also impose exorbitant costs on Los Angeles' residents and businesses. Increasing setbacks to 600 feet from the nearest residence to existing oil and gas wells and to 1,500 feet for future oil and gas development could cost the City upwards of \$90 billion it doesn't have. At a time when City leaders should be focused on making Los Angeles more affordable, ending the homelessness crisis and creating more jobs, it seems contradictory to pursue the setback recommendations and additional restrictions made in the report. These proposed policies would also have the unintended consequence of pushing our diverse and disadvantaged communities out of their neighborhoods, as more residents living on the financial brink would be forced to leave the Los Angeles region for areas where their families can afford to thrive. It is essential we embrace an "all of the above" energy strategy which incorporates all forms of energy. Shutting down oil and gas production will make us more dependent on foreign oil and imports. More than 70% of oil is currently imported from other sources, mainly foreign countries, and this percentage will drastically increase with an expanded setback distance, disadvantaging local residents. If we don't produce energy locally, we are forced to import more of it from countries that don't hire Californians, pay California taxes or apply our stringent safety, labor, and environmental standards. These policy proposals will threaten the livelihoods of thousands of working families and the businesses that employ them in Southern California. I urge you to instead pursue policies that favor an all of the above energy strategy that does not eliminate thousands of jobs and devastate Los Angeles' working families' budgets or the local economy. Regards, John P. Harber

Communication from Public

Name: Michael Taix

Date Submitted: 10/15/2019 11:40 AM

Council File No: 17-0447

Comments for Public Posting: Letter for Council File #17-0447 I am writing to express my opposition to any proposed oil and gas production setback in the City of Los Angeles. Please submit the below letter to Council File #17-0447. Thank You, Michael Taix --- Re: I oppose new proposed oil & gas setbacks I am writing to express my strong opposition to the regressive recommendations made by the Petroleum Administrator to increase setback distances and impose additional restrictions on local oil and gas production. If implemented, the proposed distances and restrictions would threaten the local economy, eliminate good-paying, middle-class jobs for thousands of Angelenos from diverse communities and also impose exorbitant costs on Los Angeles' residents and businesses. Increasing setbacks to 600 feet from the nearest residence to existing oil and gas wells and to 1,500 feet for future oil and gas development could cost the City upwards of \$90 billion it doesn't have. At a time when City leaders should be focused on making Los Angeles more affordable, ending the homelessness crisis and creating more jobs, it seems contradictory to pursue the setback recommendations and additional restrictions made in the report. These proposed policies would also have the unintended consequence of pushing our diverse and disadvantaged communities out of their neighborhoods, as more residents living on the financial brink would be forced to leave the Los Angeles region for areas where their families can afford to thrive. It is essential we embrace an "all of the above" energy strategy which incorporates all forms of energy. Shutting down oil and gas production will make us more dependent on foreign oil and imports. More than 70% of oil is currently imported from other sources, mainly foreign countries, and this percentage will drastically increase with an expanded setback distance, disadvantaging local residents. If we don't produce energy locally, we are forced to import more of it from countries that don't hire Californians, pay California taxes or apply our stringent safety, labor, and environmental standards. These policy proposals will threaten the livelihoods of thousands of working families and the businesses that employ them in Southern California. I urge you to instead pursue policies that favor an all of the above energy strategy that does not eliminate thousands of jobs and devastate Los Angeles' working families' budgets or the

local economy. Regards, Michael Taix

Communication from Public

Name: Nomsa Khalfani

Date Submitted: 10/15/2019 11:41 AM

Council File No: 17-0447

Comments for Public Posting: The Community Prevention and Population Health Task Force respectfully submits its response to the recently released “Oil and Gas Health Report” for Council file #17-0447. The Task Force has identified the protection of public health near neighborhood oil and gas development sites as a priority and hopes the City of Los Angeles will play a leading role in the region in prioritizing this public health crisis as well.



COUNTY OF LOS ANGELES COMMUNITY PREVENTION AND POPULATION HEALTH TASK FORCE

COMMUNITY PREVENTION AND POPULATION HEALTH TASK FORCE

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TASK FORCE CO-CHAIRS

Veronica Flores, MA

Nomsa Khalfani, PHD, MFT

October 15, 2019

Eric Garcetti, Mayor of Los Angeles
Herb J. Wesson, President of the Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012

RESPONSE TO OIL AND GAS HEALTH REPORT (COUNCIL FILE #17-0447)

Dear Mayor Garcetti and Members of the Los Angeles City Council:

As members of the Los Angeles County Community Prevention and Population Health Task Force (Task Force), we write to express our collective concerns and recommendations regarding the City of Los Angeles's "Oil and Gas Health Report" for Council file #17-0447. We appreciate and acknowledge the leadership of Los Angeles City Council to study the impacts of oil and gas on adjacent residents. It is disappointing that the completion of the report was significantly delayed as residents have continued to suffer from the harmful health impacts and safety risks posed by oil and gas operations in their neighborhoods. The Task Force has identified the protection of public health near neighborhood oil and gas development sites as a priority and hopes the City of Los Angeles will play a leading role in the region in prioritizing this public health crisis as well.

Although we are encouraged that the City is considering a setback recommendation, it is the Task Force's considered view that the recommendations in the Oil and Gas Health Report (Recommendations 1-3) are not grounded either in the growing body of peer-reviewed academic research cited in both this report or the Department of Public Health's 2018 health report in which health impacts were identified well beyond a half-mile radius from sensitive land uses. As a public health and equity-oriented commission, we strongly recommend that the City of Los Angeles ultimately considers a setback distance that is based on scientific peer reviewed research and the Precautionary Principle¹ and establish a set-back distance that is the most protective of the most vulnerable communities.

The Task Force is also concerned that the majority of recommendations in the report (Recommendations 5, 7, 10) are proposals for more studies. While we support the value of studies and making an informed decision, there is a sufficient body of evidence in scientific studies, the Department of Public Health's 2018 Report, and the Oil and Gas Health Report by the Office of Petroleum and Natural Gas Administration and Safety for action. In the time it took for this most recent study to be completed, residents living in close proximity to active oil and gas wells have been repeatedly exposed to harm and left vulnerable to inherent safety risks.

¹ For your convenience, we use the term Precautionary Principle to mean: "When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically. In this context the proponent of an activity, rather than the public, should bear the burden of proof. The process of applying the precautionary principle must be open, informed and democratic and must include potentially affected parties. It must also involve an examination of the full range of alternatives, including no action." Defined at Wingspread, headquarters of the Johnson Foundation in Racine, Wisconsin, January 15, 1998.

The Task Force strongly recommends that the City consider policies for a protective human health and safety setback without delay, again applying the Precautionary Principle.

Key findings and recommendations we highlight from the health assessment portions of the Oil and Gas Health Report are as follows:

- 1. There are chemicals of concern that pose a risk to nearby residents.** In the analysis of chemical use at oil and gas operations, the report does conclude that chemicals of concern pose a risk to nearby residents if environment and exposure pathways are present. Increasing surface setbacks should be considered, and there are oil and gas events occurring outside the City, such as Inglewood and Long Beach, where toxic air contaminants and other chemicals could be transported in the air and impact residents within City boundaries. The reports on chemicals are only for unconventional oil and gas operations, but the vast majority of operations are routine and conventional, but still pose a chemical hazardous threat to adjacent residents. Many of the facilities in low-income communities of color have very few protections and are readily exposed to air toxins from the active facilities.
- 2. There are several emission risks and the regulatory standards do not account for exposure to the general public.** A Fluxsense Report compiled experimental studies of hazardous emissions (alkane emissions, benzene, toluene, ethylbenzene, and xylene [BTEX], and methane) from various fossil fuel sources and concluded that oil and gas wells were the greatest contributor to emissions in the study in all categories. Another consideration the report highlights is that occupational exposure limits were not developed for the protection of the general public. The limits do not account for people who live close to oil and gas activities, who could be much younger or older, and who are exposed for up to three times more hours than an 8-hour worker.
- 3. There is compelling scientific research demonstrating health risks associated with close proximity to oil and gas development.** Of the research provided by the California Independent Petroleum Association, 22 of the 30 submitted studies were not academic, peer-reviewed studies, and of the academic, peer-reviewed studies listed, the primary finding was a comparison of methodology in methane emissions in natural gas completion projects. Methane is only one component of toxic air contaminants of concern, and there are several other more intensive phases of oil and gas extraction than the completion phase alone. On the other hand, 24 peer-reviewed, published, scientific studies found increased health risks associated with oil and gas development ranging from 500 ft to 5,280 ft. The health research consultants on the report recommended that the distance of a proposed setback should consider the body of epidemiological studies on oil and gas development.

The Task Force strongly supports the prioritization of a human health and safety setback as a critical policy solution to urban oil drilling's negative impact on human health. Policies that implement a buffer or setback have been an effective public health policy solution to limit the exposure of toxic air pollutants and other contaminants and reduce the risk of adverse health impacts. Considering that health impacts associated with oil and gas development impacts residents living one half to three miles away and that the majority of the most impacted residents are already environmentally vulnerable, low-income, communities of color, the Task Force recognizes the vital need for a health protective setback or buffer policy, based on the Precautionary Principle, to reduce exposure to harmful pollutants for those who are already cumulatively burdened by multiple socioeconomic and environmental challenges.

Community Prevention and Population Health Task Force Members:

Sonya Young Aadam · Manal Aboelata · Mayra Alvarez · Tamika Butler · Melinda Cordero-Bárzaga · Veronica Flores
Michelle Fluke · Cathy Friedman · Nancy Halpern Ibrahim · Anisha Hingorani · Anne-Marie Jones · Nomsa Khalfani
Jim Mangia · Ramella Markarian · Damon Nagami · Lauren Nakano · Elisa Nicholas · Theresa "Missy" Nitescu · Janae Oliver
Maryjane Puffer · Cori Racela · Margaret Smith · Amanda Staples · Benjamin Torres · Nicole Wong

Based on the existing scientific research and experiences of frontline communities impacted by oil and gas development activity, the Task Force understands that relying solely on mitigation and more regulation are not adequate solutions for a fundamentally incompatible land use. The Task Force supports prioritizing a policy solution that implements a setback policy over mitigation and oversight measures.

Sincerely,



Veronica Flores, MA
Task Force Co-Chair



Nomsa Khalfani, PhD, MFT
Task Force Co-Chair

Members:

Sonya Young Aadam, California Black Women's Health Project
Manal Aboelata, Prevention Institute
Mayra Alvarez, The Children's Partnership
Tamika Butler, Toole Design
Melinda Cordero-Bárzaga, Visión y Compromiso
Veronica Flores, Community Health Councils
Michelle Fluke, Antelope Valley Partners for Health
Cathy Friedman, Peace Over Violence
Nancy Halpern Ibrahim, Esperanza Community Housing
Anisha Hingorani, Advancement Project
Anne-Marie Jones, The LA 84 Foundation
Nomsa Khalfani, Essential Access Health
Jim Mangia, St. John's Well Child and Family Centers
Ramella Markarian, Adventist Health Glendale
Damon Nagami, Natural Resources Defense Council
Lauren Nakano, Beach Cities Health District
Elisa Nicholas, The Children's Clinic
Theresa Nitescu, Northeast Valley Health Corporation
Janae Oliver, Kaiser Permanente
Maryjane Puffer, The Los Angeles Trust for Children's Health
Cori Racela, Western Center on Law & Poverty
Margaret Smith, Policy Council, Los Angeles County Office of Women's Health
Amanda Staples, American Heart Association
Benjamin Torres, Community Development Technologies Center (CDTech)
Nicole Wong, Redeemer Community Partnership

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Communication from Public

Name: John Fleming

Date Submitted: 10/15/2019 05:01 PM

Council File No: 17-0447

Comments for Public Posting: I am John Fleming, Ph.D., a scientist with the Center for Biological Diversity and a constituent of District 5. In the Petroleum Administrator's Oil and Gas Health Report, the research group PSE Healthy Energy found that oil and gas development poses greater health risks the closer it is to communities. PSE goes on to say that health risks associated with oil and gas have been found at distances ranging from 500 feet to 5,280 feet, or one mile. This suggests that, to protect public health, a setback of as much as one mile should be set between drill sites and people. So, STAND LA's ask for 2,500 feet would be much more in the public's interest than the 600 ft setback recommended in the report for existing drilling, which is only the lower end of PSE's range. The City Attorney's Office should prepare a report on the feasibility of a setback ordinance, but for 2,500 ft, rather than 600 ft as put forth in the report.