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September 19, 2025

TO: Each Supervisor

FROM: Barbara Ferrer, Ph.D., M.P.H., M.Ed. 

SUBJECT: ADVANCING THE COUNTY'S LONG-TERM HEALTH, ACCOUNTABILITY, AND JUST TRANSITION GOALS DURING THE PHASE OUT OF URBAN OIL DRILLING (ITEM 16, BOARD AGENDA OF MAY 13, 2025)

This report is in response to the May 13, 2025 motion by your Board directing the Department of Public Health (DPH), in coordination with the Directors of the Departments of Regional Planning (DRP), Public Works (DPW) via the Office of Oil and Gas, and Fire, in consultation with the Chief Sustainability Officer (CSO) and County Counsel, to report back to the Board in writing in 90 days with updated recommendations for local regulations that strengthen health and safety protections and public notification requirements in operations and maintenance activities conducted at oil and gas facilities, including acid maintenance, with a focus on gaps in existing regulations.

In addition to the updated health and safety recommendations for operations and maintenance activities, DPH has been working with DRP, DPW, and CSO on the other directives in the motion, which focus on additional local actions regarding the shut-down, remediation, and reuse of former oil sites, tracking compliance with new State regulations for active drilling sites, and the Just Transition Task Force.

This memo addresses Directive 1a of the Board motion, specifically on strengthening health and safety protections. Please note that Public Health provided a [report](#) analyzing health protective policies at oil drilling sites in January 2023. Also, given the close relationship between the health and safety implications of the remediation and reuse of oil and gas sites, DPH has been working closely with DRP, regarding recommendations related to Directive 1b for inclusion into Title 22.

Update on SB 1137 Implementation

Senate Bill (SB) 1137 establishes "health protection zones (HPZ)" around oil and gas operations, prohibiting new wells and infrastructure within 3,200 feet of homes, schools, and other sensitive

locations. It also mandates enhanced monitoring, public notification, and mitigation requirements for existing operations within these zones. SB 1137 was signed into law by Governor Newsom in September of 2022, but implementation was put on hold due to a referendum that qualified for the November 2024 ballot. While the law went into immediate effect when that referendum was withdrawn in June of 2024, full implementation has been further delayed to allow for the development of staffing and other implementation support. The State's Geologic Energy Management Division (CalGEM) is the lead agency for regulating oil and gas operations, including implementation of the new requirements in SB 1137; both California Air Resources Board (CARB) and the Air Quality Management Districts also have a statutory role in implementation of SB 1137.

The updated timeline of key requirements in SB 1137 is as follows:

- Compliance, Mitigation, and Water Analysis Requirements. Compliance is required effective January 1, 2026, with federal, state and local permits on health, safety, and environment standards; this includes permits, public notices, controls on noise and light (8:00 p.m. to 7:00 a.m.), dust, emissions, and chemical analysis of the water produced as a byproduct of drilling operations. Additionally, water analysis will be required before and after any activities that may be conducted for well maintenance, plugging and/or abandonment.
- Leak Detection and Response Plans. Operators will need to develop leak detection systems and plans to monitor and alert the operator when target chemicals are detected. The plans must include protocol for rapid repair of leaks and provisions to notify local communities when a leak source cannot be identified or fixed within 48 hours. Plans must be submitted to the State for approval by July 1, 2028, and fully implemented by July 1, 2030.
- Annual Reporting Requirements. Beginning January 1, 2030, operators will be required to submit annual reports to CalGEM that include data on any leaks that trigger the detection system, associated repairs and community notifications, and on groundwater testing results; CalGEM will make these annual reports available on their website.

Updated AQMD Rule 1148.1

Several long-standing AQMD rules establish requirements for control of leaks and releases of volatile organic compounds (VOCs) at oil and gas refineries, production fields, and other facilities. Some existing rules on control of VOCs went through updates in recent years. However, in response to concerns raised by AB 617 communities (designated by California Air Resources Board as most disproportionately impacted by air pollution) located in the Wilmington, Carson, West Long Beach, and South Los Angeles areas and an AQMD Air Quality Management Plan goal for improved leak detection and repair, additional updates to the rules were made. The updates to Rule 1148.1 are focused on further reductions and control of VOC emissions through enhanced leak detection technology, equipment requirements, and compliance testing. Rule 1148.1 also mandates quarterly reporting to SCAQMD. The new requirements for optical gas imaging inspections and leak repairs became effective in February of this year, with additional provisions scheduled to take effect in January 2026.

Oil and Gas Well Acidizing and Acid Maintenance

Acidizing and acid maintenance are techniques used to improve the production and lifespan of oil wells. There are two main uses of acidizing: 1) acid used to clean the inside of the steel oil wells, called acid washing, and 2) acid used to partially dissolve the rock at the bottom of the oil well to allow crude oil to move more freely into the well, called fracture acidizing. Fracture acidizing is prohibited in California by CalGEM.

The acid mixtures used vary depending on the types of rock or residue to be dissolved and can include up to 200 different chemicals. The primary ingredient is usually either hydrochloric acid (HCl) or hydrofluoric acid (HF), or a mixture of the two acids. When using acid solutions, workers deploying them would be expected to wear full personal protective equipment (PPE) to prevent accidental exposure to the concentrated liquid. Most of the chemicals used in acidizing have not been thoroughly studied to determine their toxicological effects, but some (more than 25 chemicals) would fall into the category of hazardous, with effects that include carcinogenic, mutagenic, teratogenic, or acute toxicity. There is a recent SCAQMD requirement that operators must notify the public prior to acidizing and alert CalGEM within 60 days after the completion of the acid use.

Summary Of Gaps and Recommendations

The updates to State air quality rules and the requirements of SB 1137 represent meaningful measures to mitigate risks for communities near oil and gas extraction sites. Additional local requirements focused on greater transparency and consistently accessible information would provide further benefit for surrounding communities as these new State regulations become effective. County codes in Titles 11, 12, and other sections should also be updated, as needed, to align with new mitigation requirements in SB 1137.

Community Health and Safety Plans

Residents and communities living near oil/gas facilities have a detrimental lack of information. People need to know what is happening in their neighborhoods and the actions they can take to improve environmental conditions and to protect their health when unusual conditions or incidents are observed. This applies to both operations that could pose hazards during routine extraction activities, such as acid maintenance, and during emergency incidents. Community Health and Safety Plans (CHSP) can help address gaps in information and should include the following components:

- Days and times work occurs at the facility, including ongoing extraction and maintenance and work activities related to well abandonment and closure
- Notification plans to the community when hazardous activities such as acidization take place;
- Government agencies that regulate the work;
- Contact information for questions and/or emergencies;
- What to do in case of emergency; and
- What steps are in place to protect the community from possible hazards, including leaks and spills.

This is a low-demand requirement for operators to populate a CHSP with information they have readily available. Community health and safety plans can be posted on a webpage and sent out to nearby addresses. These serve as a tool to empower community members to take action regarding health and safety risks in their communities. Importantly, it is frequently a community member who brings a compliance issue to the attention of the regulatory agency.

The CHSP model has been successfully used at sites such as Allenco Energy Inc. in South Los Angeles, where nearby community members sought better enforcement and health protection measures from operations at that site. DPH created the original CHSP model, has supported the development and use of the CHSP at multiple sites, and can serve an ongoing role in reviewing plans and in assisting the community to access, understand, and use the plans.

Additional recommendations on the CHSP and other elements of the motion were included in a letter sent by the County Oil and Gas Coalition (see Attachment) on August 4, 2025, to DPH and other County departments. DPH supports the group's recommendations in concept and is evaluating the best way to incorporate them into the CHSPs. Continued discussions on CHSPs and how they can support the phase out process are occurring with DRP and County Counsel.

Accessible Information on Accidental Releases (Including Leaks and Spills)

Existing State regulations require a spill report for the release of hazardous materials from oil and gas facilities when it causes harm to a person or threatens to cause harm to a person or the environment, enters a state waterway, or is of a volume greater than 42 gallons. The report is required to be sent to the California Office of Emergency Services (CalOES) as soon as possible, but no later than within two hours of discovery.

Leaks and spills are also identified through routine inspection and other enforcement actions based on new and updated State regulations. Multiple State regulations, including updated Rule 1148.1, mandate reporting of leaks and spills to the State. There should be a local, centralized, readily accessible source of information on leaks and spills that are reported per State regulations that is regularly updated. Steps that are in place to prevent and respond to leaks and spills should also be addressed in Community Health and Safety Plans.

Community Alert Notification Systems

The Baldwin Hills Community Standard District serves as the model for a Community Alert Notification system ("CAN"), which establishes an automatic notification of area residents and businesses in the event of an emergency that requires taking shelter, evacuating, or other protective actions. A CAN system allows area residents and businesses to opt in to receive notification directly from the operator in the event of an emergency. The CAN is an operator-controlled system that can only be activated with authorization from the Fire Department or another first responder agency.

Oil and Gas Facility Status	SB 1137 and/or Rule 1148.1 Requirements	Gaps	Recommendations
Routine Extraction Operations, Maintenance	SB 1137: Starting 7/2026 new requirements on signage and engineering controls for existing wells within 3,200 feet of sensitive receptors. Includes contact information requirements, sound, light and dust mitigation, and vehicle speed limits. Annual reporting to State starting 2030.	Community members do not have information about ongoing operations, potential hazards, or what will happen in case of emergency. Public Health codes in Titles 11 and 12 are not aligned with new noise mitigation requirements in SB 1137.	Require the 11 operators in unincorporated LAC to develop, submit for approval, and distribute Community Health and Safety Plans. Update County codes in Titles 11, 12, and other sections as needed, to align with new mitigation requirements in SB 1137.
Routine Extraction Operations - Leaks & Spills	SB 1137: Effective 2028 with implementation requirement in 2030; requirements for leak detection and response plans, emissions detection system, alarm system (alerts operator), alarm response protocol, and communication plan that notifies local emergency responders and local public health authorities. Rule 1148.1: Starting 1/2026 enhanced leak detection technology, equipment requirements, and compliance testing; quarterly reporting to SCAQMD.	While regulations require a substantial amount of information sharing among State and County Departments, there is currently no consistent communication pathway for this information to reach community members.	Create centralized, readily accessible information on leaks and spills that are reported per State regulations that is updated on a regular basis, possibly through the Office of Oil and Gas. Protocols for leaks and spills should also be addressed in community Health and Safety Plans
Routine Extraction Operations - Emergency Incidents	SB 1137 has a leak detection and response plan requirement, but only for leaks and not for any other possible emergencies	Existing requirements for emergency response plans do not speak to other risks (beyond leaks and spills) for	Require operators to develop, submit for approval, and distribute community Health and Safety Plans.

		people outside the fence line.	Work with the regulatory agencies to develop a process to address risks outside the fence line in required emergency planning
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Next Steps

These recommendations address motion Directive 1 with a focus on active oil extraction operations. DPH will continue to work closely with DRP and other Departments in response to Directive 2, to address ongoing health and safety risks during well abandonment, site closure, and redevelopment. DPH is also working with DPW and other Departments through the Office of Oil and Gas to continue to explore implementation and funding mechanisms to advance both short- and long-term goals related to the phase out process.

Please let me know if you have any questions or need further information.

BF:ak:cm

c: Chief Executive Officer
County Counsel
Executive Office, Board of Supervisors
Regional Planning
Public Works
Chief Sustainability Office