



Heal the Bay

December 1, 2023

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California State Lands Commission
100 Howe Avenue, Suite 100 South
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RE: December 5, 2023 Agenda Item 59 - Assess twelve Offshore Oil and Gas Pipelines through Analysis of Public Trust Resources and Values (APTR) - Support with Recommendations

Submitted electronically via ShorelineComments@slc.ca.gov

Dear Honorable Chair Kounalakis, Commissioners, and Staff:

Heal the Bay is an environmental non-profit organization based on the lands of the Tongva people with nearly 40 years of experience dedicated to making the coastal waters and watersheds of greater Los Angeles healthy, safe, and clean. Our team of scientists, activists, educators, and community advocates works tirelessly to help confront and mitigate the impacts of climate change as one of the four core pillars of our work with an ultimate goal of a just transition away from all fossil fuels.

We support the proposed action to grant authority to the Executive Officer to solicit a Request for Qualifications for consultant services, negotiate a fair and reasonable price, award and execute agreements for the preparation of an Analysis of Public Trust Resources and Values (APTR) to assess the risks and impacts to Public Trust resources of all 12 leases for offshore oil and gas pipelines under the Commission's leasing jurisdiction. Additionally, in lieu of a temporary moratorium, we urge the commission to consider authorizing a permanent moratorium on the acceptance and consideration of new lease applications involving offshore oil and gas pipelines.

The initiative to conduct an APTR for the twelve existing offshore oil and gas pipeline leases under the Commission's jurisdiction is a commendable and necessary step in ensuring responsible stewardship of our coastal and marine resources. The proposed APTR will provide crucial information to guide the Commission in its future application reviews and decision-making processes. We'd like to highlight the necessary engagement with Tribal governments and environmental justice communities and thank the Commission for including this in the proposed analysis process.

The proposal does include an examination of alternatives to pipelines and associated risks. Heal the Bay acknowledges the critical importance of shifting away from modern fossil fuel energy to more sustainable and renewable alternatives. We respectfully suggest a few recommendations to even further improve this forward-thinking perspective:



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1. Include marine spatial planning as a part of the analysis to minimize adverse impacts on public trust uses and marine protected areas.

The coastal and marine areas surrounding the existing offshore oil and gas pipelines in Southern California serve as a dynamic and interconnected space of shared current and potential future uses. Southern California boasts more than 50 marine protected areas (MPAs), playing a pivotal role as essential conservation tools in fostering ecosystem resiliency. These waters are not only home to diverse marine life but also accommodate a range of human activities, including vital shipping lanes, aquaculture projects, commercial and recreational fisheries, and numerous other shared uses. The significance of these shared uses cannot be overstated, as they collectively contribute to the region's ecological, economic, and societal well-being.

The proposed assessment already includes environmental risks of spills, alignment with public needs and values, and risks associated with climate change. In addition, we recommend integration of a comprehensive geospatial analysis that maps and evaluates the spatial relationships between the pipelines and local MPAs, shipping routes, fishery grounds, aquaculture projects, proposed offshore renewable energy projects, and other shared uses and the possible risks to those uses. Such an in-depth examination will be instrumental in capturing the nuanced and interconnected risks associated with this infrastructure. Moreover, it will provide critical insights for informed decision-making, ensuring that the assessment encompasses the multifaceted impacts on both the environment and the communities that rely on these coastal and marine resources.

2. Conduct a decommission risk analysis as part of the examination of alternative methods to pipeline infrastructure and authorize a permanent moratorium on the acceptance and consideration of new lease applications involving offshore oil and gas pipelines.

As we confront the escalating hazards of climate change, California's communities and ecosystems face unprecedented challenges. The aging offshore oil and gas pipelines, under the Commission's jurisdiction, not only contribute to climate change but also pose immediate and tangible risks to our coastal areas. The imperative to transition away from fossil fuels is clear, and this necessitates a comprehensive examination of alternative methods to pipeline infrastructure. The proposed APTR already includes pipeline alternatives, however, this transition to alternatives inevitably involves the decommissioning of existing pipelines.

Decommissioning, while a necessary step, is a complex process fraught with its own implicit risks, including the potential for oil spills and the disturbance of marine ecosystems. It is imperative, therefore, that a decommission risk analysis be an integral part of the proposed examination. This analysis must assess the potential environmental impacts and challenges associated with decommissioning, ensuring that we navigate this



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phase with utmost caution and responsibility. By considering the intricacies of decommissioning within the broader analysis, we can develop a more comprehensive understanding of the risks and benefits associated with the entire lifecycle of offshore oil and gas pipelines. This approach is essential in guiding a transition towards more sustainable energy alternatives and safeguarding the future of our coastal environments.

As we advocate for a permanent moratorium on new lease applications, it is critical to ground our decisions in a thorough understanding of the challenges and implications of decommissioning, ensuring that our actions align with the broader goals of environmental protection and sustainable resource management.

In closing, Heal the Bay extends our gratitude to the Commission and dedicated staff for the opportunity to provide input on this critical matter. We commend the Commission for taking proactive steps toward responsible stewardship of our coastal and marine resources through the proposed APTR. In the face of climate change, these considerations are pivotal in guiding our transition towards sustainable and renewable alternatives. Heal the Bay stands in support of the proposed analysis and the potential for a permanent moratorium on new lease applications involving offshore oil and gas pipelines.

Sincerely,

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