

Staff Report 53

PARTY:

California State Lands Commission

PROPOSED ACTION:

Extend the target completion date for the Offshore Oil and Gas Pipeline Analysis of Impacts to Public Trust Resources and Values (APTR) from December 31, 2026, to December 31, 2027, and reaffirm and continue the temporary moratorium on the acceptance and consideration of new lease applications involving offshore oil and gas pipelines, and the issuance of new offshore oil and gas pipeline leases, until the APTR is complete and its results are considered by the Commission.

AREA, LAND TYPE AND LOCATION:

Sovereign land statewide.

STAFF ANALYSIS AND RECOMMENDATION:

AUTHORITY:

Public Resources Code sections 6005, 6216, 6301, and 6501.1; common law Public Trust Doctrine.

PUBLIC TRUST AND STATE'S BEST INTERESTS:

The Commission leases sovereign lands for offshore pipelines that connect oil and gas production facilities with onshore facilities and markets. These pipelines occupy public lands and may affect marine habitats, coastal economies, cultural resources, underserved communities, and the public's use of the coast and ocean. As trustee of these lands, the Commission must consider those interests in administering its leases.

In December 2023, the Commission directed staff to prepare the APTR and established a temporary moratorium on new offshore pipeline lease applications and lease issuances while that work proceeded ([Item 59](#)). Securing the funding needed for the APTR took longer than anticipated, shifting completion beyond the original December 31, 2026 target. Staff recommends extending that target by one year and continuing the moratorium to allow completion of the APTR, public review, and Commission consideration of the results.

BACKGROUND AND PURPOSE:

California law substantially limits new offshore oil and gas development. The California Coastal Sanctuary Act of 1994 generally prohibits new leases for oil and gas extraction within state waters, subject to limited statutory exceptions. Public Resources Code section 6245 also generally prohibits new leases authorizing construction of oil and gas infrastructure in state waters associated with Pacific Outer Continental Shelf leases issued after January 1, 2018. (Pub. Resources Code, §§ 6240-6245.)

Existing offshore production continues to rely on pipelines crossing state lands. The Commission's pipeline leases authorize occupation and use of defined areas of those lands and establish the terms under which the facilities may be used and maintained. Some pipelines connect offshore platforms to shore, while others connect platforms within larger production and transportation systems. Several leases have reached the end of their stated terms, and others will do so over the next several years.

Much of this infrastructure was installed decades ago. Since then, coastal uses, environmental conditions, scientific understanding, and California's energy policies have changed. The APTR is intended to provide an updated assessment of the leased pipeline uses and their potential effects on Public Trust resources and values.

The Commission's leased premises form part of larger oil and gas production and transportation systems that may include upstream production facilities, such as offshore platforms, as well as pipelines, processing facilities, and onshore transportation infrastructure associated with the midstream movement of produced oil and gas. Those facilities either are or may be subject to separate property rights, permits, and regulatory oversight. The APTR draws on information about those connected components where it helps explain the use of the leased premises and the potential effects of that use. Its principal focus is the Commission's pipeline leases and the information relevant to administering them.

LEASES INCLUDED IN THE APTR:

The December 2023 staff report identified 12 pipeline leases for evaluation. Three leases serving Platforms Hermosa and Esther were subsequently excluded because the associated pipelines are no longer used to transport oil or gas. The APTR currently addresses the following nine leases shown in Table 1, below, for facilities located offshore of Santa Barbara, Ventura, Los Angeles, and Orange Counties. Six of the nine leases will be in holdover when the new moratorium ends.

Table 1 – APTR Leases.

Lease	Lessee / Operator	Principal Facilities	Status / Lease Term
6911	Freeport-McMoRan Oil and Gas / DCOR, LLC	Oil and gas pipelines and associated utility facilities between Federal Platform Irene and shore.	In holdover; lease term ended October 31, 2022.
4977	Pacific Offshore Pipeline Company (POPCO) / Sable Offshore Corp.	Gas pipeline between Federal Platform Hondo and shore.	In holdover; lease term ended December 31, 2021.
7163	Exxon Mobil Corporation / Sable Offshore Corp.	Oil/emulsion pipeline, produced water outfall, power cables serving Federal Platform Harmony.	In holdover; lease term ended January 31, 2022.
4017	DCOR, LLC	Two pipelines carrying oil and gas between Federal Platform A and the Rincon Operating Facility.	In holdover; lease term ended August 27, 2017.
5967	DCOR, LLC	Two pipeline bundles serving Federal Platforms Gina and Gilda, including oil, gas, water, and electrical facilities.	In holdover; lease term ended March 31, 2026.
5636	San Pedro Bay Pipeline Company / Amplify Energy	Oil pipeline connecting the Federal Platform Elly system to shore.	Active; lease term through March 24, 2028.

Lease	Lessee / Operator	Principal Facilities	Status / Lease Term
3116	DCOR, LLC	Water line and inactive hydrocarbon pipelines between Platform Eva and shore, including an oil pipeline, a non-operational gas pipeline, and an abandoned-in-place oil pipeline.	Active; lease term through March 25, 2029.
6417	DCOR, LLC	Oil pipeline between State Platform Eva and Federal Platform Edith used for oil transport; power cables from shore serving both platforms and an associated shore conduit.	Active; lease term through November 30, 2027.
5663	SoCal Holding, LLC	One oil pipeline and two gas pipelines between State Platform Emmy and shore.	Active; continuing term tied to production, subject to agreement provisions.

Table 1 summarizes the facilities associated with each lease. The APTR's evaluation centers on the pipeline uses and their potential effects on Public Trust resources.

APTR PROGRESS:

The Commission retained Industrial Economics, Inc. (IEc) to lead preparation of the APTR. Staff is working with IEc and its technical specialists to assemble available information, evaluate pipeline risks, and develop the resource analyses.

Work underway includes review of pipeline inspection records, remaining strength calculations, maintenance practices, and potential external hazards such as seismic activity, anchor strikes, and severe storms. Oil spill modeling is also being conducted to assess how releases under selected hypothetical scenarios could move through the marine environment and affect coastal resources.

The planned resource analyses address potential effects on climate change, environmental resources, ocean and coastal uses, economic resources, environmental justice, and cultural and tribal resources. Staff is conducting tribal consultation to gain a better understanding of the tribal practices, cultural landscape, and culturally significant resources that may be present in the vicinity of the pipelines.

IEC is also examining the pipelines' role in California's energy supply and developing a comparison of selected alternatives for meeting the energy needs they serve. Alternatives under review include importing oil and gas from other regions, increasing onshore production of oil and gas, and increased reliance on biomass-based fuels for transportation. The analysis of alternatives is intended to help the Commission understand the potential impacts and tradeoffs under a hypothetical scenario where the pipelines covered by the APTR are no longer being used along with equivalent energy being acquired from alternative sources.

The draft APTR remains in development; when released for public review, it will include the methods, assumptions, and limitations underlying the analyses, so that the Commission and the public can evaluate its findings.

PUBLIC ENGAGEMENT AND REMAINING SCHEDULE:

On August 13 and 17, 2026, staff held three public webinars to introduce the APTR and explain its purpose, scope, and anticipated schedule. The presentations described the leases under review, the work underway, and future opportunities for participation. Participants were able to ask questions about the study and its relationship to the Commission's responsibilities. The presentation materials, report outline, and frequently asked questions are available on the Commission's [APTR webpage](#).

Staff initiated outreach for tribal consultation with culturally and traditionally affiliated California Native American tribes in May 2026. Two tribes responded to the outreach. Commission staff met with staff from the Santa Ynez Band of Chumash Indians in August and a meeting with the Tribe's Tribal Historic Preservation Officer is pending scheduling. The Coastal Band of the Chumash Nation also expressed interest in meeting with staff, and staff is awaiting scheduling information. Staff will perform additional outreach in fall 2026 to tribes originally contacted in the spring.

Staff currently anticipates releasing the draft APTR for public review in spring 2027 and holding two hybrid public meetings during the comment period, one serving

the Santa Barbara and Ventura County area and another serving the Los Angeles and Orange County area.

Following public review, staff and IEc will consider comments and revise the report as appropriate. Staff is targeting presenting the completed APTR to the Commission in the latter part of 2027. The proposed December 31, 2027 target, accommodates the remaining technical work, tribal consultation, public review, and preparation of the final report.

CONTINUATION OF THE MORATORIUM:

The Commission's December 2023 authorization established a target date for completing the APTR and separately provided that the moratorium would continue until the report was complete and its results were considered by the Commission. Those conditions remain the basis for the moratorium's duration.

Staff recommends extending the APTR's target completion date by one year while retaining that approach. December 31, 2027, would be the revised target for completing the report; the moratorium would remain tied to completion and Commission consideration, rather than expire on that date.

Continuing the moratorium will allow the Commission to consider the completed analysis, public input, and information developed through tribal consultation before proceeding with new offshore pipeline lease applications and lease issuances. The additional time serves the purpose for which the Commission originally directed the work.

CONCLUSION:

Staff recommends extending the APTR's target completion date to December 31, 2027, and reaffirming and continuing the temporary moratorium until the report is complete and its results are considered by the Commission. These actions will allow staff to complete the technical analysis and public review needed to inform the Commission's administration of its offshore pipeline leases and are in the State's best interests.

OTHER PERTINENT INFORMATION:

1. The APTR is an informational study prepared to support the Commission's administration of its offshore pipeline leases. It is not a California Environmental Quality Act (CEQA) document. Any subsequent proposal requiring Commission

approval would be considered separately, including compliance with CEQA as applicable.

2. Extending the APTR's target completion date and continuing the existing moratorium are not projects as defined by CEQA because they are administrative actions that will not result in direct or indirect physical changes in the environment. The proposed action adjusts the study schedule and maintains the existing restrictions on new offshore pipeline lease applications and lease issuances.

Authority: Public Resources Code section 21065 and California Code of Regulations, title 14, sections 15060, subdivision (c)(3), and 15378, subdivision (b)(5).

RECOMMENDED ACTION:

It is recommended that the Commission:

PUBLIC TRUST AND STATE'S BEST INTERESTS:

Find that extending the APTR's target completion date and continuing the temporary moratorium are consistent with the common law Public Trust Doctrine and are in the best interests of the State because they allow completion and consideration of the APTR before proceeding with new offshore oil and gas pipeline lease applications and lease issuances.

AUTHORIZATION:

Extend the target completion date for the APTR established on December 5, 2023 ([Item 59](#)), from December 31, 2026, to December 31, 2027, and reaffirm and continue the temporary moratorium authorized in that item on the acceptance and consideration of new lease applications involving offshore oil and gas pipelines, as well as the issuance of new offshore oil and gas pipeline leases, until the APTR is complete and its results are considered by the Commission.