

# APPLICATIONS

## APPEAL APPLICATION CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) Instructions and Checklist



### RELATED CODE SECTIONS

The Los Angeles Municipal Code (LAMC) [Section 13B.11.F. of Chapter 1A](#) establishes the appeal procedure to the City Council for California Environmental Quality Act (CEQA) determinations.

### PURPOSE

A CEQA determination can only be appealed if a non-elected, decision-making body (ZA, APC, CPC, DIR) makes a determination for a project that is not further appealable. If a final decision on a project was made by the City Council, either as the initial decisionmaker or on appeal, the related CEQA determination is not appealable.

To initiate appeal of a CEQA appeal, this form must be completed with the required materials attached and filed within 15 calendar days from the final administrative decision of the entitlement application.

### GENERAL INFORMATION

#### Appealable CEQA determinations:

- Certified Environmental Impact Report (EIR)
- Sustainable Communities Environmental Assessment (SCEA)
- Mitigated Negative Declaration (MND)
- Negative Declaration (ND)
- Categorical Exemption (CE)
- Statutory Exemption (SE)

#### Non-appealable CEQA determinations:

- Addenda to any of the above-listed CEQA determinations
- Findings made pursuant to [CEQA Guidelines Section 15162](#)
- An action in which the determination does not constitute a project under CEQA

All CEQA appeals are heard by the City Council. This form is only for appeals related to determinations made by Los Angeles City Planning. All other CEQA appeals shall be filed with the City Clerk pursuant to [LAMC Section 197.01](#).

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council. Persons affiliated with a CNC may only file as an individual on behalf of self.

## CASE INFORMATION

Environmental Case Number: ENV-2025-3305-CE

Related Entitlement Case Number(s): ZA-2025-2976-ZAI-1A

Project Address: Citywide

Date of Final Entitlement Determination: November 10, 2025

The CEQA Clearance being appealed is a(n):

EIR       SCEA       MND       ND       CE       SE

## APPELLANT

Check all that apply.

Representative       Property Owner       Other Person  
 Applicant       Operator of the Use/Site

## APPELLANT INFORMATION

Appellant Name: Warren E&P, Inc.; Warren Resources of California, Inc.; and Warren Resources, Inc.

Company/Organization: Warren E&P, Inc.; Warren Resources of California, Inc.; and Warren Resources, Inc.

Mailing Address: 625 E. Anaheim Street

City: Wilmington      State: CA      Zip Code: 90744

Telephone: 310-494-5343      E-mail: tthompson@warrenresources.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

Self       Other: \_\_\_\_\_

Is the appeal being filed to support the original applicant's position?

YES       NO

## REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): Ty Thompson

Company: Warren Resources, Inc.

Mailing Address: 625 E. Anaheim Street

City: Wilmington      State: CA      Zip Code: 90744

Telephone: 310-494-5343      E-mail: tthompson@warrenresources.com

## JUSTIFICATION / REASON FOR APPEAL

Attach a separate sheet providing the specific reasons for the appeal. The reasons must state how CEQA was incorrectly applied, providing a legal basis for the appeal.

## APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature: Ty Thompson

Digitally signed by Ty Thompson  
Date: 2025.11.20 06:52:37 -07'00'

Date: 11/20/2025

## GENERAL NOTES

*A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.*

*The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.*

### THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$178 Date : 11/21/25

Reviewed & Accepted by (DSC Planner): J. Chan

Receipt No.: 200349675524 Date : \_\_\_\_\_

Deemed Complete by (Project Planner): \_\_\_\_\_

## ENVIRONMENTAL APPEAL FILING REQUIREMENTS

If dropping off an appeal at a Development Services Center (DSC), the following items are required. See also additional instructions for specific case types. To file online, visit our [Online Application System \(OAS\)](#).

*Note: City Clerk prepares the mailing list for CEQA appeals per LAMC Section 11.5.13 E of Chapter 1.*

### APPEAL DOCUMENTS

#### 1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- Environmental Appeal Application
- Justification/Reason for Appeal
- Copies of the written Letter of Determination (LOD), from the final appellate body, which must be a non-elected decision-making body

#### 2. Electronic Copy

- Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., “Appeal Form”, “Justification/Reason Statement”, or “Original Determination Letter”). No file should exceed 70 MB in size.

#### 3. Appeal Fee

- Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.a. (Appeal Fees) of Chapter 1A; or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(b) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.b. (Appeal Fees) of Chapter 1A.

November 20, 2025

**VIA ANGELENOS ONLINE  
APPLICATION PORTAL**

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

Re: *Case No. ZA-2025-2976-ZAI; ENV-2025-3305-CE  
Justification for CEQA Appeal of Zoning Administrator's Interpretation of Well Maintenance*

Dear Councilmembers:

We represent Warren E&P, Inc.; Warren Resources of California, Inc.; and Warren Resources, Inc.; (collectively “Warren”) in its CEQA Appeal of the City of Los Angeles (“City”) Department of City Planning June 12, 2025 Zoning Administrator Interpretation ZA-2025-2976-ZAI, which purports to define “maintenance” as it is used in Los Angeles Municipal Code (“LAMC”) sections 13.01-H and 13.01-I (the “ZAI” or “2025 ZAI”). Warren submits the following justification statement in support of its CEQA Appeal, and incorporates by reference all prior submissions to the City Planning Commission (“CPC”) in support of its appeal of the 2025 ZAI, as well as arguments and written submissions in support of its appeal of the 2023 Zoning Administrator Interpretation ZA-2022-8997-ZAI (herein, the “2023 ZAI”), and all written and oral comments submitted by industry in support of the appeals. Warren additionally incorporates by reference all arguments and evidence submitted by appellant E&B Natural Resources Management Corporation and its related entities in support of its appeals of the 2023 and 2025 ZAIs.<sup>1</sup>

Warren brings this appeal before the City Council pursuant to LAMC Chapter 1A, section 13B.11.1.F to challenge the “determination that an approval under this Article is not subject to CEQA either because it is not a project as defined by the California Environmental Quality Act

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<sup>1</sup> For purposes of any subsequent litigation, this appeal is also deemed to include the administrative record as compiled by the parties to the prior oil and gas ordinance litigation, as discussed in the March 3, 2025, stipulation for entry of judgment and writ in that case (*Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court, No. 23STCP00060, and related cases).

“CEQA”) or the CEQA Guidelines or because it is exempt.”<sup>2</sup> By bringing this appeal, Warren does not waive its position that the oil and gas related regulations of Chapter 1A and any related ZAI, are additionally not effective as to Warren (and others) per Section 1.4.7, which acknowledges the lawsuits challenging the since repealed Ordinance No. 187,709 and the 2023 ZAI, and explicitly states that any such regulations are “ineffective until such time as this Section (related to *Warren v. City of LA*, Case No. 23STCP00060 and its related cases) is amended.” The City Council adopted Section 1.4.7 of Chapter 1A specifically to require a legislative amendment to Section 1.4.7, which requires City Council approval, prior to developing and applying any new restrictions on oil and gas production facilities, specifically including any new “Zoning Administrator Memos and Interpretations.” Therefore, under the express terms of Section 1.4.7, any ZAI adopted by the City related to oil well regulations is ineffective until the City Council acts. Regardless, the City has adopted the ZAI without amending Section 1.4.7, and Warren therefore files this appeal to the extent Chapter 1A and the ZAI might apply to Warren.

Warren is an interested party under Section 13B.11.1.F.2. Warren operates a drilling and production site and holds mineral interests within the City and would be detrimentally affected by the implementation of the ZAI. Warren has a beneficial interest that would be adversely affected by the environmental impacts associated with the ZAI, and the ZAI will otherwise have a direct, substantial effect on Warren and its operations.<sup>3</sup>

For the reasons set forth below, Warren respectfully requests that City Council grant its appeal, consider the potential environmental impacts of the ZAI, and require appropriate environmental review under CEQA.

### Background

The 2025 ZAI defines the term “maintenance” as used in LAMC sections 13.01-H and 13.01-I, pertaining to oil and gas operations as: (1) A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from CalGEM; or (2) A scope of work that requires notification per SCAQMD Rule 1148.2 – “Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers” for “Well Rework” and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing. Applying that definition of “maintenance,” the ZAI “implement[s] a review process intended to minimize land

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<sup>2</sup> The accompanying form incorrectly states that a CEQA appeal is not available to challenge a determination that an approval is not a project under CEQA. Regardless, the Zoning Administrator also stated that the 2025 ZAI was categorically exempt from CEQA. Moreover, under section 13B.11.1.F.2.d of LAMC Chapter 1A, an appeal may be filed to the City Council of “a determination that an approval under this Article is not subject to CEQA *either because it is not a project as defined by CEQA or the CEQA Guidelines or because it is exempt.*” (Emphasis added.)

<sup>3</sup> Further, Warren makes these comments on behalf of the public interest, which interest would suffer if the City were not compelled to perform its duties under CEQA.

use impacts. . . .” ZAI at p. 8 [emphasis added]. The ZAI further states that “[t]he well maintenance activities listed in this ZAI are permitted only when filed, reviewed, and approved, pursuant to both the applicable code section and appropriate procedures as established thereto.” *Id.* at 7.

The City has gone down this path before, when it adopted a similar, unlawful interpretation of “maintenance” in 2023 that was voided by a court. Nothing has materially changed since the City’s last failed attempt to skirt CEQA review and overstep its authority, yet the City continues to try to impose unlawful limitations on operators within City limits. More specifically, in January 2023, the Zoning Administrator issued the 2023 ZAI, purporting to define “maintenance” for oil and gas well sites using language identical to the definition set out in the present ZAI. The 2023 ZAI attempted to define “maintenance” both as it appeared in the LAMC to be revised under Ordinance No. 187,709, *and as it was used in former LAMC section 13.01-H.*

Warren and others filed a lawsuit in Los Angeles Superior Court asserting, among other claims, that the City’s adoption of Ordinance No. 187,709, the 2023 ZAI, and ZA Memo No. 141 violated CEQA by its utter neglect to perform environmental review, constituted a taking of Warren’s vested rights, and was preempted by state law. In September 2024 a Los Angeles Superior Court judge ultimately found that the ordinance and ZA documents attempted to regulate a matter of statewide concern and were preempted by state law. *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court Case No. 23STCP00060 (Sept. 6, 2024). To avoid continued litigation related to damages resulting from the City’s violation of the law, the parties entered a stipulated judgment that included rescission of the ordinance, 2023 ZAI, and ZA Memo No. 141.

The Zoning Administrator then issued the present ZAI in June 2025, less than three months after the Court issued the writ, and almost immediately after the City officially rescinded the 2023 ZAI. The present ZAI again attempts to redefine maintenance as it is used in the LAMC in the same way as was attempted by the 2023 ZAI. By its own terms, the ZAI “replaces a previous ZAI.” And the City Planning Staff Report to the CPC on the appeals of the ZAI (“Staff Report”) acknowledges that the ZAI and the 2023 ZAI are the same: “This subject ZAI is substantively similar to the aforementioned 2023 well maintenance ZAI.” (Staff Report at p. 3 [chart describing Exh. C].)

Warren timely filed an appeal of the 2025 ZAI to the CPC, which appeal was ultimately heard on October 9, 2025. The CPC issued a Letter of Determination denying Warren’s appeal on November 10, 2025, making it ripe for the present CEQA Appeal. Having exhausted its appeals through the CPC, Warren now brings this CEQA Appeal before the City Council.

### The City Is Illegally Piecemealing Required Environmental Review

The City’s adoption of the ZAI to regulate oil well maintenance not only flies in the face of the Superior Court’s writ of mandate, but as Warren and others have been asserting for years, adoption of the ZAI results in illegal piecemealing of the City’s required environmental review under CEQA.

The ZAI is part of the City's larger effort to regulate and ultimately ban all oil drilling activities. The ZAI was undoubtedly issued in anticipation of the City's adoption of a new oil and gas ordinance that mirrors Ordinance No. 187,709 (the "Draft Ordinance"). Indeed, the City's readoption of a new oil and gas ordinance is not speculative. Rather, the City has on multiple occasions stated its intent to pursue adoption of an ordinance that prohibits well maintenance. To that end, the Draft Ordinance was published for public review on September 17, 2025, and the City has engaged in two stakeholder meetings on the Draft Ordinance. (See Council File No. 24-1466.) Like Ordinance No. 187,709, the Draft Ordinance seeks to make oil well sites a nonconforming use, to prohibit the drilling of new wells, and to prohibit the maintenance of existing wells. The Draft Ordinance also seeks to codify the same language contained in the ZAI related to the definition of maintenance. So while the Staff Report characterizes the City's adoption of the Draft Ordinance as a mere possibility, the public record clearly demonstrates that the Draft Ordinance has been prepared and is ready for presentation to City Council.

Consequently, there is no question that the ZAI is part of a larger regulatory scheme that certainly constitutes a "project" within the meaning of CEQA. To that end, the City's attempt to issue the ZAI to redefine maintenance before passing an ordinance to regulate or prohibit maintenance is simply a thinly veiled attempt to improperly piecemeal the larger project into smaller segments. But 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). In 2023, the City attempted to ban maintenance via Ordinance No. 187,709, and then attempted to define maintenance via the 2023 ZAI. Reversing the order of operations by issuing an identical ZAI before readoption of the new (nearly-identical) Draft Ordinance does not cure the piecemealing defects of the City's prior actions.

In response to Warren's and others' arguments, the Staff Report asserts that Warren's arguments related to piecemealing are unsupported by evidence or explanation, while simultaneously ignoring recent activities that clearly indicate that the ZAI is part of a larger regulatory scheme. (Staff Report at p. 19.) Citing the elements outlined in *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1989) 47 Cal.3d 376, the Staff Report claims that the ZAI is not part of a larger, reasonably foreseeable project that may have significant environmental impacts because "[t]he possibility of a later ordinance does not transform this administrative interpretation into piecemealing or a broader project." (*Id.* at pp. 19-20.) The Staff Report also states that "CEQA requires agencies to evaluate the action before them, the 'whole of the action', not hypothetical future legislation" and goes on to argue that "if a future ordinance is proposed, it will undergo its own CEQA review." (*Id.* at p. 20 [emphasis added].) However, the Staff Report has entirely omitted any discussion of the fact that the City is currently engaged in an on-going parallel effort to develop and adopt the Draft Ordinance.

Contrary to the City's claims that it is engaged in two separate, unrelated processes, the City in fact is attempting to fast-track a component of the Draft Ordinance by utilizing the ZAI to reinterpret long-standing code language in a manner consistent with a yet-adopted ordinance. This approach is classic piecemealing, as the City is carving out a narrow component of the Draft Ordinance in an attempt to avoid meaningful environmental review of its impacts. The Staff

Report’s mischaracterization of the Draft Ordinance as “hypothetical future legislation” is disingenuous. The Draft Ordinance was prepared at the direction of the City Council, has been the subject of numerous public stakeholder meetings, and has been presented to the public for review. Because the ZAI and Draft Ordinance seek to regulate the very same activity, both actions are part of a larger regulatory scheme that must be analyzed as a single project under CEQA. The City must prepare an Environmental Impact Report (“EIR”) analyzing the impacts associated with these regulations because the implementation of these policies has the potential to significantly impact the environment.

### The ZAI is a Project

The City claims the ZAI is not a “project” under CEQA Guidelines, section 15378 because it is “an administrative and procedure-making activity to assist in the implementation of the City’s preexisting Zoning Code provisions regarding oil well sites.” ZAI at p. 8.

For purposes of CEQA, a “project” is “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.) The ZAI is certainly a “project” within the meaning of CEQA because it is reasonably foreseeable that implementation of the ZAI will result in physical changes in the environment. The ZAI creates a new definition for “maintenance” in an effort to regulate activities that are currently allowed under existing zoning regulations. The City’s claim that the ZAI is administrative in nature ignores the significant policy shift created by including certain routine activities—activities that Warren has engaged in for years under existing City approvals—within the definition of well maintenance such that they now would require further discretionary review. Further, the City fails to account for the potential environmental impacts resulting from this substantial change in land use regulation as compared to current law.

In the very same paragraph stating that it is not a project, the ZAI continues to describe that it “provides a definition of oil well maintenance *to implement a review process* intended to minimize land use impacts. . . .” ZAI at p. 8 [emphasis added]. The ZAI additionally states that “[t]he well maintenance activities listed in this ZAI are permitted only when filed, reviewed, and approved, pursuant to both the applicable code section and appropriate procedures as established thereto.” *Id.* at 7. By its own terms, then, the ZAI is more than a simple administrative action to clarify a preexisting term in the LAMC. Rather, the ZAI is “implementing a review process” that will provide the City the ability to deny routine well maintenance activities when the City historically had not required any such review prior to adoption of the 2023 ZAI. As to acid maintenance, no such review was required historically and it has not been required since the Court ruled that the 2023 ZAI was unlawful.<sup>4</sup>

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<sup>4</sup> Section 15378(a) specifically defines a “Project” as including “enactment and amendment of zoning ordinances.” The ZAI is not only effectively an amendment of the zoning code, but as discussed above, is part and parcel to the City’s anticipated enactment of a new oil ordinance. The ZAI also does not meet any of the exceptions to the definition of a “project,” such as a “continuing administrative or maintenance

Further, under the City’s new review process, all routine well maintenance activities would be subject to a process whereby those activities will likely never be approved. The effect is a *de facto* ban on all maintenance activities, just as Ordinance No. 187,709 and the 2023 ZAI attempted to do. The City is therefore required to perform a CEQA review to analyze the impacts of this project. Among many others, the impacts analyzed should include: the impact of the project on the availability of mineral resources; the potential geological impacts; the air quality, noise, and GHG impacts derived from accelerated plugging and abandonment of wells throughout the City due to the inability to perform maintenance activities; and the impacts of the same stemming from increased oil imports and oil tanker activity at the Port of LA.<sup>5</sup>

Indeed, the County of Los Angeles Department of Regional Planning (“LA County Planning”) has prepared an Initial Study in connection with the County’s Revised Oil Well Ordinance which, like the ZAI, is designed to phase out oil production activities in the County. The County’s Initial Study is attached. Therein, the County concludes that preparation of an EIR under CEQA is required in connection with the adoption of the County’s Revised Oil Well Ordinance due to the potentially significant impacts to mineral resources. As previously explained in more detail, the City’s ZAI is a *de facto* ban on maintenance activities in support of the City’s restriction of oil and gas operations. As with the County’s ordinance, then, an EIR under CEQA is similarly necessary in connection with the City’s ZAI, which will undoubtedly have an impact on mineral resources, among other potential environmental impacts that the City has failed to consider despite Warren and others urging such consideration.

#### The ZAI is Not Exempt from CEQA Review

The City additionally claims that even if the ZAI were deemed a “project” under CEQA, it would be exempt from CEQA review “under the Class 8 and common sense exemptions.” (ZAI at p. 8.) A Class 8 categorical exemption applies to “actions taken by regulatory agencies to assure the maintenance, restoration, enhancement, or protection of the environment.” CEQA Guidelines, Section 15308. The ZAI does no such thing. Instead, by requiring a new discretionary review process for routine maintenance activities, the ZAI creates uncertainty and risk to the environment by limiting the ability of existing, authorized oil and gas production facilities to operate consistent with state and local law and the historical practices of the City. As discussed above, the ZAI will have the intended effect of prohibiting previously-routine maintenance activities on wells in the City. Without necessary maintenance, wells and facilities are at increased risk of casing failures, corrosion, methane leaks, and a slew of other potential hazards. Rather than assuring the protection of the environment, then, the ZAI is likely to have

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activity” like purchasing supplies, or the creation of government fiscal activities, nor does it fall into the category of “[o]rganizational or administrative activities of government agencies that will not result in direct or indirect physical changes to the environment.” CEQA Guidelines, Sections 15378(b)(2); 15378(b)(5).

<sup>5</sup> These potential impacts have been described on numerous occasions including in Warren’s previous comment letters addressing Ordinance No. 187,709 and the 2023 ZAI, as well as Warren’s Petition for Writ of Mandate in *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court Case No. 23STCP00060, all of which are incorporated herein in full by reference.

an unintended detrimental effect on the environment due to the increased risk of these potential hazards from wells that cannot be maintained. This directly counters a Class 8 exemption, and highlights the necessity for a complete environmental review. Moreover, and as also described above, the ZAI is reasonably likely to have an adverse impact on the availability of mineral resources, which impact would also counter a Class 8 exemption.

The City's reliance on the "common sense exemption" set forth in CEQA Guidelines, section 15061(b)(3) is similarly flawed. Under the "common sense exemption," a project is not subject to CEQA "[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment." Here, it is not only possible that the ZAI will have a significant effect on the environment—it will have such an effect. Again, the ZAI is intended to and will have the effect of restricting well maintenance activities and thereby significantly impact the availability of mineral resources. And by restricting or prohibiting maintenance, the City exposes existing wells to increased risk of numerous hazards, all of which would be harmful to the environment.

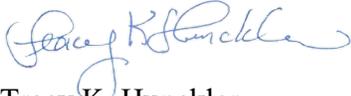
Even if such maintenance activities are not outright prohibited, maintenance will become more difficult and less frequent. As explained above, the possible impacts of such restrictions include: the impact on the availability of mineral resources; the potential geological impacts; the air quality, noise, and GHG impacts derived from potential accelerated plugging and abandonment of wells throughout the City; and the impacts of the same stemming from increased oil imports and oil tanker activity at the Port of LA.

Finally, even if any categorical exemption may theoretically apply, the "unusual circumstances exception" set forth at section 15300.2(c) would also apply to except the project from any categorical exemption. *See Respect Life South San Francisco v. City of South San Francisco* (2017) 15 CA5th 449, 458 [determination whether significant environmental impacts might result from an unusual circumstance identified by the agency is reviewed under the "fair argument" standard]. First, redefining the term "maintenance"—after decades of a different understanding of the term—to give it a new meaning that would require an entirely new review process is itself an unusual "administrative activity." Moreover, the unusual circumstances exception applies where the project will have a significant impact on the environment. Given the ultimate (and intended) outcome of the ZAI, there is at least a reasonable possibility of significant environmental impacts, as described above, including most notably, the loss of availability of mineral resources, increased risk of hazards from unmaintained wells, and other impacts. In other words, even apart from the Draft Ordinance—which cannot and should not be ignored—the ZAI on its own implements a process whereby approval of maintenance activities will become more difficult, if not impossible, likely impacting the environment, the extent of which has not been analyzed. These exceptions preclude the City from relying on a categorical exemption or the common sense exemption to avoid analyzing potential impacts associated with adoption of the ZAI, as required by CEQA.

For all of the above reasons, Warren urges the City Council to grant its appeal and require an appropriate environmental review of the 2025 ZAI and its possible impacts.

Sincerely,

DAY CARTER & MURPHY LLP



Tracy K. Hunckler

TKH:cb

Attachment

**PROJECT SUMMARY**

<b>Project Title</b>	Revised Oil Well Ordinance
<b>Project No./Case No.</b>	PRJ2025-000212
<b>Related Case No(S).</b>	RPPL2025000276, RPPL2025000277, RPPL2025000284
<b>Lead Agency Name &amp; Address</b>	County of Los Angeles Department of Regional Planning ("LA County Planning") 320 W. Temple Street, 13 <sup>th</sup> Floor Los Angeles, CA 90012
<b>Location &amp; Custodian of Record of Proceedings</b>	LA County Planning 320 W. Temple Street, 13 <sup>th</sup> Floor Los Angeles, CA 90012
<b>Staff Contact</b>	Kenneth Warner
<b>Staff Email &amp; Phone Number</b>	<a href="mailto:ordinance@planning.lacounty.gov">ordinance@planning.lacounty.gov</a> (213) 974-6432
<b>Project's Sponsor/ Project Applicant's Name &amp; Address</b>	LA County Planning 320 W. Temple Street, 13 <sup>th</sup> Floor Los Angeles, CA 90012
<b>Project Location</b>	Los Angeles County (Countywide)
<b>Assessor's Parcel Number (APN)</b>	N/A
<b>USGS Quad</b>	N/A
<b>Gross Acreage</b>	Approximately 1,696,000 acres (approximately 2,650 square miles)
<b>Supervisory District</b>	Countywide
<b>General Plan or Community/Area Plan Designation</b>	Implementation of the Revised Oil Well Ordinance, once approved, would occur throughout unincorporated Los Angeles County in all General Plan and Area Plan designations.
<b>Planning Area</b>	Implementation of the Revised Oil Well Ordinance, once approved, would occur throughout unincorporated Los Angeles County in all Planning Areas.
<b>Zoning/Community Standards District (if applicable)</b>	Implementation of the Revised Oil Well Ordinance, once approved, would occur throughout unincorporated Los Angeles County in all zoning designations and Community Standards Districts.

**Brief Description of Project:**

The project includes: i) Amendments to Title 22 – Planning & Zoning of the Los Angeles County Code to prohibit new oil wells and production facilities, designate existing oil wells and production facilities as nonconforming due to use, and modify standards for oil wells during the amortization period ii) Amendments to the Baldwin Hills Community Standards District (CSD) to be consistent with Countywide prohibition of oil wells and production facilities and standards for oil wells during the amortization period, iii) Amendments to Title 12 - Environmental Protection of the Los Angeles County Code to remove noise exemptions for oil wells, and iv) Amendments to the General Plan in support of sustainability and environmental justice goals by phasing out oil production in unincorporated Los Angeles County.

**Surrounding Land Uses & Setting:**

The affected areas are adjacent to open space, residential, commercial, and industrial zones in urban, suburban, and rural settings across Los Angeles County.

**Native American Consultation:**

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1?

Yes       No

If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

LA County Planning has notified California Native American tribes pursuant to AB 52. LA County Planning will comply with all provisions of AB 52 and SB 18.

**Note:** Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission’s Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

**Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreements):**

<i>Public Agency</i>	<i>Approval Required</i>
None	None

**Concurrent projects in the area:**

<i>Project/Case No.</i>	<i>Description and Status</i>
None	None

**Reviewing Agencies:**

*Responsible Agencies*

- None
- Regional Water Quality Control Board:
  - Los Angeles Region
  - Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

*Special Reviewing Agencies*

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains

*Regional Significance*

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area

*Trustee Agencies*

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

*County Reviewing Agencies*

- DPW
- Fire Department
  - Forestry, Environmental Division
  - Health Hazmat
- Sanitation District
- Public Health/Environmental Health Division: Drinking Water Program (Private Wells), Toxics Epidemiology Program (Noise)
- Sheriff Department
- Parks and Recreation
- Subdivision Committee

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially significant impacts affected by this project.

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Aesthetics             | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Agriculture & Forestry | <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Recreation                         |
| <input type="checkbox"/> Air Quality            | <input type="checkbox"/> Hydrology/Water Quality       | <input type="checkbox"/> Transportation                     |
| <input type="checkbox"/> Biological Resources   | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Cultural Resources     | <input checked="" type="checkbox"/> Mineral Resources  | <input type="checkbox"/> Utilities/Service Systems          |
| <input type="checkbox"/> Energy                 | <input type="checkbox"/> Noise                         | <input type="checkbox"/> Wildfire                           |
| <input type="checkbox"/> Geology & Soils        | <input type="checkbox"/> Population/Housing            | <input type="checkbox"/> Mandatory Findings of Significance |

## DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.
- I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Kenneth Warner



3/27/25

Print Name (Project Planner)

Signature (Project Planner)

Date

Bruce Durbin



3/27/25

Print Name (Section Head)

Signature (Section Head)

Date

**EVALUATION OF ENVIRONMENTAL IMPACTS:**

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

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## PROJECT DESCRIPTION

### Overview

The project is an ordinance amending the Los Angeles County Code and an amendment to the County of Los Angeles General Plan.

This ordinance and general plan amendment establish a regulatory framework to phase out oil production activities in unincorporated Los Angeles County. Specifically, the project includes amendments to the Los Angeles County Planning & Zoning Code (Title 22) including the Baldwin Hills Community Standards District (CSD), the County Environmental Protection Code (Title 12), and the County of Los Angeles General Plan. These updates will align County land use policies with regional sustainability and environmental justice goals, while ensuring the safe and orderly phase out of oil production activities.

#### 1. Title 22 (Planning & Zoning) Oil Well Ordinance:

Under the proposed ordinance, no new oil wells or production facilities may be established in any zone. Pursuant to Section 22.172 of the County Code (Nonconforming Uses, Buildings, and Structures), existing, legally established oil wells or production facilities operating without an approved Conditional Use Permit or other discretionary permit will be considered nonconforming and subject to a 20-year amortization period. In addition, the ordinance establishes performance standards addressing signage, comment and complaint logging, site maintenance, bonding, well plugging, and site abandonment and restoration. This ordinance would apply to all oil wells in unincorporated Los Angeles County, except in the Coastal Zone.

#### 2. Baldwin Hills Community Standards District (CSD) Amendment:

The project amends the Baldwin Hills CSD to align with and fully implement the provisions of the Title 22 Oil Well Ordinance described above, ensuring consistent application of the new regulations and standards within the Baldwin Hills CSD area.

#### 3. Removal of Title 12 (Environmental Protection) Exemption for Oil & Gas Wells:

The project eliminates the current exemption of oil and gas wells from the Noise Control regulations set forth in Title 12 of the County Code. Consequently, these wells will be subject to all provisions of the Noise Control chapter, ensuring better management of noise impacts related to oil and gas extraction activities.

#### 4. General Plan Amendment:

The project amends the General Plan. Specifically, it revises the Land Use Element, Conservation and Natural Resources Element, and Safety Element to prohibit new oil well operations and remove designations that support oil production activities.

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## Background

Los Angeles County has a long history of oil production, much of it occurring in densely populated and environmentally sensitive areas. Over time, concerns about oil production’s potential negative impacts to public health, safety, and environmental quality—especially near homes, schools, and parks—have intensified. In response, the County of Los Angeles Board of Supervisors has prioritized environmental justice and transition away from fossil fuel dependence. Key actions informing this project include:

- A 2021 Board Motion emphasizing the protection of public health and directing the development of an Oil Well Ordinance.
- Findings from the Baldwin Hills Community Standards District (CSD) and its associated EIRs, which identified air quality degradation, potential hazards, and other risks stemming from oil production.

Building upon these initiatives, this project aligns with the County’s sustainability goals by reducing stationary pollution sources and promoting healthier, more livable communities. The project will amend the General Plan and Los Angeles County Code to provide a regulatory framework for phasing out oil operations in the unincorporated areas. Although the County plays a key role, oil wells and production facilities are also regulated and permitted by a network of federal, state, regional, and local agencies. These include California Department of Transportation (Caltrans), California Water Boards (RWQCB), California Department of Conservation Geologic Energy Management Division (CalGEM), California Department of Toxic Substances Control (DTSC), California Occupational Safety and Health Administration (CalOSHA), Department of Transportation (USDOT), Environmental Protection Agency (USEPA), Governor's Office of Emergency (Cal OES), Occupational Safety and Health Administration (OSHA), South Coast Air Quality Management District (SCAQMD), and State Fire Marshall. In addition to the Department of Regional Planning (DRP), Los Angeles County agencies include the Fire Department, Department of Public Health (DPH), and Public Works (PW).

Recent statewide legislation complements the project and reinforces the County’s sustainability and environmental justice efforts, including:

- Senate Bill 1137 (2022): Establishes 3,200-foot health protection zones around sensitive receptors like residences, schools, and hospitals, prohibiting new oil and gas wells within these areas and imposing stricter standards on existing operations. While SB 1137 sets state-level restrictions based on proximity to sensitive receptors, the project takes a broader approach, prohibiting new wells countywide in unincorporated areas, as well as phasing out existing oil operations.
- Assembly Bill 1866 (2024): Increases fees for idle wells statewide and requires stricter Idle Well Management Plans (IWMPs) to compel operators to properly close and remediate wells.
- Assembly Bill 2716 (2024): Targets low-production wells in the Inglewood Oil Field, requiring all such wells there to be closed and abandoned by December 31, 2030.
- Assembly Bill 3233 (2024): Strengthens local authority by confirming the power of local governments to regulate or prohibit oil and gas operations via ordinance.

## Proposed Performance Standards During Amortization

During the amortization period for existing oil wells and production facilities, the Title 22 (Planning & Zoning) Oil Well Ordinance and Baldwin Hills Community Standards District (CSD) Amendment,

described above, propose a set of performance standards designed to ensure that ongoing operations are safe, orderly, and minimally impactful to surrounding communities during the phase-out process. These standards apply countywide to any oil well or production facility subject to the Title 22 Oil Well Ordinance or Baldwin Hills CSD Amendment and will be phased in according to specific timelines. Requirements for signage, complaint tracking, site maintenance, bonding, and well abandonment ensure that the eventual retirement and restoration or conversion of each site proceeds in a responsible manner.

### 1. Applicability and Compliance Schedule

Existing oil wells and production facilities become nonconforming uses upon the effective date of this project, unless they already operate under a discretionary permit with a defined expiration. These nonconforming wells must comply with certain provisions immediately, such as site maintenance and well abandonment requirements, while other standards take effect after one or two years. This tiered compliance schedule allows operators time to update signage, institute complaint-tracking procedures, post bonds, and address other operational details before permanently shutting down their wells.

### 2. Signage Requirements

To maintain orderly operations and facilitate oversight, operators must install specific signs at each well site or production facility. Sites where oil production is the sole use will display entrance identification signs that include the operator's name, the lease name, and relevant contact numbers for odor complaints (South Coast Air Quality Management District) and land-use inquiries. Wells on lots with other primary uses will also post signage at any fenced perimeter. These signage rules, along with requirements for well identification signs, ensure that members of the public and regulators can quickly identify an operator and locate the correct reporting channel for issues.

### 3. Complaint and Comment Log

Operators must establish a written log tracking all incoming comments and complaints about site operations, whether conveyed by phone or email. This log records the date, time, and nature of each complaint, as well as the response offered. Operators must respond within 24 hours (or the next business day), providing an update on actions taken to address the issue. The log must be available to the Director of Regional Planning upon request, promoting accountability and enabling prompt resolution of nuisance or hazard concerns.

### 4. Site Maintenance Provisions

Recognizing that oil production facilities can affect local aesthetics and public safety, the project imposes rigorous site maintenance rules. Operators must keep all structures, fences, walls, and equipment in good condition, free of graffiti, rust, or staining. Pools of oil, water, or debris must be removed, and any weeds or dry brush within 25 feet of wells or production facilities must be cleared to reduce fire risk. Any drilling or repair equipment that is no longer in use must be removed within 90 days. Once a well is abandoned, the site must be restored to its original condition as nearly as practicable.

### 5. Bonding Requirements

To safeguard against potential financial shortfalls that could leave wells improperly closed or sites unremediated, operators will be required to post indemnity bonds. The Director of Regional Planning sets the amount (no less than \$152,000 per well), based on the site's complexity and operational scope. The bond ensures coverage of well plugging, reabandonment if required by the

California Geologic Energy Management Division (CalGEM), and remediation efforts if contamination is discovered. These bonds may be reassessed every five years and are released only when all wells on a site have been fully plugged and the lot restored to the Director's satisfaction.

## 6. Well Plugging and Abandonment

In alignment with CalGEM standards, this project confirms that wells must be properly sealed, equipment removed, and contaminated materials disposed of in an approved manner. Operators are required to clear unused pipelines and clean the well site of oil and debris. The closure process must be completed expeditiously—within 60 days following plugging—while final restoration must occur no later than one year after the last well on a lot is abandoned, unless CalGEM approves a longer timeline.

These performance standards ensure that operators fulfill all environmental and public health obligations until the completion of site restoration. Items such as signage and complaint logging address the immediate need for transparency and responsiveness, while bonding and well-abandonment provisions protect against long-term risks, including soil contamination, fire hazards, and visual blight. The project thus facilitates a responsible phase-out of oil production, striking a balance between operator feasibility and community welfare.

## Plugging & Abandoning Oil Wells in California

The California Geologic Energy Management Division (CalGEM) and state legislature have established specific requirements for plugging and abandoning oil wells in California to protect public health and prevent environmental hazards. These regulations, codified under Title 14 of the California Code of Regulations and Chapter 1 of the Public Resources Code, ensure that all wells are safely decommissioned. Key requirements include:

1. **Cement Plugging:** Wells must be sealed with cement plugs to isolate oil and gas zones and prevent contamination of freshwater aquifers. Cement plugs are typically placed at the bottom of the well, across oil or gas zones, and at intervals to ensure complete isolation.
2. **Freshwater Protection:** Cement barriers are required to protect freshwater zones from potential contamination by hydrocarbons or other harmful substances. This includes placing a minimum 200-foot cement plug across fresh-saltwater interfaces.
3. **Removal of Equipment:** All production equipment, pipelines, and associated infrastructure must be removed from the site during abandonment. Any materials that pose contamination risks must be properly disposed of in accordance with state and federal regulations.
4. **Surface Restoration:** After the plugging process, the well site must be restored to its original condition or adapted for future use. This includes regrading the site, reseeding vegetation, and addressing any soil contamination.
5. **Inspection and Compliance:** CalGEM inspectors oversee plugging and abandonment operations to ensure compliance with applicable standards. This includes verifying the proper placement of cement plugs, the removal of equipment, and the adequacy of surface restoration efforts.
6. **Idle and Hazardous Wells:** Idle wells that are not currently producing oil or gas must be managed under strict guidelines to prevent them from becoming environmental hazards. Hazardous or deserted wells are prioritized for immediate abandonment and remediation.

7. Financial Assurance: Operators are required to post indemnity bonds or other financial assurances to cover the costs of plugging, abandonment, and site restoration. The amount of the bond depends on the well's depth, location, and complexity.
8. Special Requirements: In some cases, additional measures may be necessary, such as enhanced cementing techniques for fractured formations or the use of bridge plugs to secure specific zones within a well.

These regulations ensure that abandoned oil wells do not pose ongoing risks to public health, safety, or the environment. The Title 22 (Planning & Zoning) Oil Well Ordinance and Baldwin Hills Community Standards District (CSD) Amendment, described above, require that wells are plugged and abandoned in compliance with all CalGEM regulations.

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## ENVIRONMENTAL SETTING

### Project Location

Los Angeles County spans approximately 4,083 square miles and is home to 88 cities and unincorporated areas totaling approximately 2,656 square miles. These unincorporated regions feature diverse landscapes, ranging from densely populated urban neighborhoods to rural and agricultural areas. The project applies to the unincorporated areas of Los Angeles County.

The project area hosts a broad range of land use designations, including residential, industrial, open space, and agricultural zones, many of which are directly adjacent to existing oil production activities. These oil production activities, especially concentrated in areas like the Baldwin Hills CSD area within the Inglewood Oil Field, raise concerns about land use compatibility, environmental quality, and negative impacts to public health.

Figures 1 and 2 provide maps of the unincorporated areas and the boundaries of the Baldwin Hills CSD to illustrate the project's geographic scope.

### Site Background

The unincorporated areas of Los Angeles County span diverse and distinct regions. To provide a mechanism for local communities to work with the County to develop plans that respond to their unique character, the County of Los Angeles General Plan establishes 11 Planning Areas. The project specifically addresses areas where oil production activities are currently active or could potentially expand, including but not limited to the areas detailed below for each Planning Area:

1. Antelope Valley Planning Area
  - a. Characterized by vast, open desert terrain and lower population densities, oil production is limited in this region but located near agricultural and rural residential uses.
2. Coastal Islands Planning Area
  - a. No known major oil resources.
3. East San Gabriel Valley Planning Area
  - a. The Whittier Oil Field, in the Puente Hills near the city of Whittier, was discovered in 1897 and became a significant oil producer in the early 20th century. The area has a history of oil drilling, with several companies operating in the region. The Whittier Oil Field is located near natural habitats and urban areas.
4. Gateway Planning Area
  - a. While sparse oil operations exist in the unincorporated communities of the Gateway Planning Area, the Area's major oil fields—including Santa Fe Springs, Long Beach, and Seal Beach—are largely within incorporated cities.
5. Metro Planning Area
  - a. Discovered in 1923, the Dominguez Oil Field is situated beneath the Dominguez Hills near Carson, California, approximately fourteen miles south of downtown Los Angeles. It became a significant oil producer from its inception through the 1960s, leading to the establishment of numerous refineries and industrial complexes in the area. The field is adjacent to urban areas, educational institutions, and residential neighborhoods.

6. San Fernando Valley Planning Area
  - a. Located in the Santa Susana Mountains north of the Porter Ranch neighborhood, the Aliso Canyon Oil Field was discovered in 1938. It peaked as an oil producer in the 1950s and was later repurposed as a natural gas storage facility in the 1970s.
7. Santa Clarita Valley Planning Area
  - a. Nestled between the Santa Susana, San Gabriel, and Sierra Pelona Mountains, this region encompasses active oil production areas such as Pico Canyon and Placerita Canyon. Historically significant as the site of California's first commercially successful oil well, the valley's oil activities are now located near residential areas, open space preserves, recreational, and institutional uses.
8. Santa Monica Mountains Planning Area
  - a. Santa Monica Mountains North Area: Known for its scenic and ecological significance, this region has a limited number of oil production activities primarily located near the northern foothills and adjacent valleys. While extraction is less intensive here compared to other regions, operations are in proximity to protected open spaces, wildlife corridors, and recreational areas.
9. South Bay Planning Area
  - a. Discovered in 1932, the Wilmington Oil Field is one of the largest in the United States, originally containing approximately three billion barrels of oil. It extends from San Pedro Bay through Long Beach and east of the Palos Verdes Peninsula, including the unincorporated community of West Carson.
10. West San Gabriel Valley Planning Area
  - a. Discovered in 1917, the Montebello Oil Field is situated in the Montebello Hills, adjacent to the city of Montebello. This discovery transformed the area from its agricultural roots into a major oil-producing region. At its peak, the field contributed to approximately one-eighth of California's crude oil production. Over the years, the surrounding landscape has urbanized, with the oil field now bordered by residential neighborhoods, commercial developments, and recreational areas.
11. Westside Planning Area
  - a. Baldwin Hills Community Standards District (CSD): The Baldwin Hills CSD comprises much of the Inglewood Oil Field. It is bordered by residential neighborhoods, schools, and Kenneth Hahn State Recreation Area.

Oil field operations encompass activities such as well drilling, maintenance, fluid production and processing, including temporary storage. Drilling operations typically require substantial surface grading, construction of sound suppression walls, and installation of well pads, taking 7–14 days per pad. Drilling occurs 24 hours a day over a 10-day period for each well, powered by diesel engines. Additionally, secondary containment and stormwater management systems mitigate risks from spills, leaks, and heavy rainfall.

The Inglewood Oil Field has been a center of oil production activities in Los Angeles County, producing over 368 million barrels of oil since its inception in 1924. This Oil Field lies adjacent to Kenneth Hahn State Recreation Area. Drainage from portions of the field flows into retention basins designed to contain spills and manage stormwater runoff, ultimately discharging into the Los Angeles County storm drain system and natural watercourses such as Ballona Creek.

Residents and communities surrounding the Inglewood Oil Field have long expressed concerns regarding air quality, noise, vibration, and potential health risks associated with oil production activities. The field operates amidst densely populated urban areas, including residential neighborhoods and schools. Emissions from oil production activities and drilling operations

contribute to cumulative air quality impacts, while noise from drilling rigs, trucks, and other equipment also affects nearby residents.

In recent decades, advancements in oil production technology and evolving regulatory oversight have shaped its operational landscape. However, historical practices left behind environmental contamination, including hydrocarbons in soil and localized contamination in perched groundwater zones adjacent to densely urbanized residential neighborhoods, schools, recreational areas and environmentally sensitive habitats. Modern operations are subject to stricter environmental regulations, including bioremediation programs treating hydrocarbon-impacted soil and stormwater management plans to prevent offsite contamination.

Proactive remediation programs have recently treated over 220,000 cubic yards of hydrocarbon-impacted soil using bioremediation. Retention basins and advanced spill response plans further mitigate environmental risks. However, localized contamination in soil and perched groundwater remains a legacy issue of historical operations, requiring continued oversight and management.

The project seeks to phase out oil operations in unincorporated Los Angeles County, transitioning the project sites to other uses. This transition aligns with County sustainability goals and reflects broader regional priorities for environmental protection, equitable land use planning, and a just transition to a fossil-fuel-free economy.

## Existing Conditions/Site Characteristics

The project area features a broad range of urban, suburban, rural, and natural landscapes. These areas include residential neighborhoods, schools, parks, sensitive habitats, and recreational spaces, many of which are adjacent to or impacted by existing oil production facilities. The environmental setting provides the context for understanding the potential impacts of the project.

## Surrounding Land Uses

The project encompasses the unincorporated communities throughout Los Angeles County. Los Angeles County is bordered by Ventura County to the west, Kern and San Bernardino Counties to the north and east, and Orange County to the southeast, with each neighboring area having distinct characteristics and land uses that influence the regional context of the project. For example:

- To the north: Kern County's oil production zones illustrate regional significance of fossil fuel operations but contrast with Los Angeles County's push toward sustainability and land use compatibility.
- To the east, west, and south: Urban and suburban neighborhoods intermingle with industrial zones, underscoring the need for careful regulation to prevent land use conflicts.

Within the unincorporated areas of Los Angeles County, significant portions of land near oil operations are designated for residential, recreational, or sensitive environmental uses.

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## PURPOSE OF THIS INITIAL STUDY

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed regulatory framework to phase out oil production activities in unincorporated Los Angeles County. This study is conducted in compliance with the California Environmental Quality Act (CEQA), pursuant to the California Public Resources Code (PRC) § 21000 et seq. and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, § 15000 et seq.). CEQA requires public agencies to identify and assess the environmental consequences of their actions and to adopt feasible mitigation measures where significant impacts may occur (PRC § 21002, CEQA Guidelines § 15021).

Specifically, this Initial Study aims to:

1. Determine whether the proposed project may result in significant environmental effects that necessitate the preparation of an Environmental Impact Report (EIR), or whether a Negative Declaration (ND) or Mitigated Negative Declaration (MND) may suffice (CEQA Guidelines § 15063).
2. Provide a transparent, public-facing document that outlines the environmental setting, evaluates potential impacts, and considers the project's consistency with applicable land use and environmental policies (CEQA Guidelines § 15125).
3. Ensure compliance with CEQA by addressing direct, indirect, and cumulative impacts associated with the proposed amendments to the County Planning & Zoning Code, the Baldwin Hills Community Standards District, the County General Plan, and the County Environmental Protection Code (CEQA Guidelines §§ 15064, 15130).
4. Facilitate informed decision-making by County officials and provide opportunities for meaningful public and stakeholder participation (PRC § 21003, CEQA Guidelines § 15082).

While CEQA requires a Mitigation Monitoring and Reporting Program (MMRP) for projects with significant impacts that require mitigation (PRC § 21081.6, CEQA Guidelines § 15097), the Revised Oil Well Ordinance project has only two significant impacts, both related to the loss of mineral resources (CEQA Guidelines Appendix G, Section XIII [Mineral Resources]). These impacts are unavoidable and cannot be mitigated due to the nature of the project, which involves phasing out oil production activities. All other potential impacts have been determined to be less than significant and do not require mitigation measures. These impacts are effectively managed through compliance with existing federal, state, and local regulations. This Initial Study reflects the project's alignment with CEQA's goals of minimizing environmental harm and promoting sustainable land use practices (PRC § 21001).

# ENVIRONMENTAL IMPACT ANALYSIS

## I. Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code §21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Have a substantial adverse effect on a scenic vista?

**Less than Significant Impact.** The project is expected to have a beneficial effect on scenic vistas within unincorporated Los Angeles County over the long term by phasing out oil production activities and removing associated industrial infrastructure. Scenic vistas are typically valued for their unobstructed views of natural or urban landscapes, including significant ridgelines, coastal areas, and other important visual resources identified in the County of Los Angeles General Plan.

Currently, existing oil wells, pump jacks, and related equipment can disrupt or diminish the quality of scenic vistas by introducing industrial elements into the landscape. By prohibiting new oil wells and phasing out existing operations, the project will lead to the eventual removal of these visible disruptions.

In the short term, temporary visual disturbances could occur during decommissioning activities. These may include the presence of heavy equipment, temporary fencing, or staging areas. However, such impacts would be localized, limited in duration, and would diminish once the dismantling and restoration processes are complete. By incorporating Site Maintenance standards in the proposed Title 22 (Planning & Zoning) Oil Well Ordinance and Baldwin Hills Community Standards District (CSD) Amendment, the project ensures orderly and aesthetically sensitive operations. These standards require keeping sites free from debris and obstructions, removing equipment within specified timeframes, and maintaining structures in good condition. As a result, any negative effects on scenic vistas would be limited and temporary.

Furthermore, the proposed Signage requirements would not substantially detract from scenic views. While operators must install or maintain visible identification and safety signs, the project limits their size, location, and design, thereby minimizing any visual intrusion.

The project does not introduce new structures that would adversely affect designated scenic highways, significant ridgelines, or other identified scenic resources as mapped by the County or adjacent jurisdictions. Instead, it supports existing County policies aimed at protecting and enhancing scenic character. Therefore, while minor temporary effects may occur, the overall long-term impact on scenic vistas is expected to be beneficial. Any short-term adverse visual effects associated with decommissioning would be less than significant.

- b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

**Less than Significant Impact.** The project would phase out existing oil production operations and remove associated infrastructure in unincorporated Los Angeles County. It does not involve constructing new buildings, major grading, or other activities that would substantially damage scenic resources such as trees, rock outcroppings, or historic buildings. Instead, it focuses on eliminating existing oil facilities and restoring or converting affected sites to land uses more compatible with surrounding communities and natural features. Decommissioning activities and interim operations are subject to the project's Well Plugging and Abandonment and Site Maintenance requirements that protect the surrounding environment by mandating the timely removal of equipment, debris, and any hazardous materials.

Sites affected by the project are not located adjacent to or within the viewshed of any state-designated scenic highways, as identified by the California Department of Transportation or the General Plan. Without proximity to a designated scenic highway or other identified scenic resources, the likelihood of adverse effects on views from or toward these landscapes is minimal. Any short-term visual changes during decommissioning, such as the presence of construction equipment, would be temporary and managed to reduce visual clutter. In the rare event that project activities occur near a scenic resource, compliance with the project's Site Maintenance and Bonds provisions would safeguard against impacts. The required Bonds ensure the County can address or correct any unremediated impacts if an operator fails to comply with restoration obligations. The project's Signage standards encourage neat, appropriately sized identification signs, which further reduces the potential for visual clutter.

Moreover, the removal of oil infrastructure may enhance the visual quality of previously industrialized landscapes over time, potentially improving the overall scenic character of the affected areas. Compliance with existing ordinances and best management practices ensures that the project avoids unnecessary damage to scenic elements.

In summary, the project's activities—limited to removing existing infrastructure, regulating interim operations, and restoring disturbed sites—would not substantially damage scenic resources within a state scenic highway corridor or similar protected area. Therefore, potential impacts to scenic resources are considered less than significant.

- c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

**Less than Significant Impact.** In nonurbanized areas of unincorporated Los Angeles County, existing oil infrastructure—such as pump jacks, tanks, and pipelines—introduces industrial elements that contrast with surrounding natural landscapes. Public views from trails, parks, scenic roads, or other publicly accessible vantage points can be adversely affected by these operations. Phasing out oil production and removing associated facilities—combined with the project’s required Well Plugging and Abandonment provisions—would ultimately restore and improve the visual integrity of these areas. Over time, this would create a more harmonious visual environment, enhancing public views and scenic quality. During the amortization period, the project’s Site Maintenance standards would limit any unsightly debris, graffiti, or abandoned equipment that could erode visual quality.

During the interim decommissioning and site restoration period, the use of heavy equipment, temporary fencing, and staging areas may result in short-term, localized visual changes. However, these effects are limited in duration and would not substantially degrade the overall visual character or quality of public views. The project’s required Comment and Complaint Log mechanism also provides a pathway for addressing any aesthetic concerns raised by residents or visitors. Once decommissioning is complete and the sites are restored, the landscape would be returned to a more natural or compatible condition, resulting in a long-term improvement.

In urbanized areas, the project aligns with applicable zoning and existing regulations intended to protect and enhance visual quality. By designating existing oil wells as nonconforming uses and phasing them out, the project supports local and Countywide objectives for improved community aesthetics and land use compatibility. Existing standards—such as those within the County’s Zoning Ordinance, Area Plans, or Community Standards Districts—already govern building form, signage, massing, and architectural style. Compliance with these regulations would further ensure that the project does not conflict with zoning or other requirements meant to preserve and enhance scenic quality in urbanized settings.

Overall, the project is expected to improve the visual environment in both nonurbanized and urbanized areas. Any temporary visual disturbances during the removal of oil infrastructure would be less than significant, and the long-term outcome would be a more visually cohesive, aesthetically pleasing landscape.

- d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

**Less than Significant Impact.** Existing oil production operations in unincorporated Los Angeles County often involve nighttime lighting for safety and operational purposes, as well as infrastructure (e.g., storage tanks, pipes) that can reflect sunlight and create glare during the day. By phasing out and removing oil wells and associated facilities, the project is anticipated to reduce these existing sources of artificial light and glare, thereby improving nighttime visibility and diminishing daytime glare conditions.

Temporary lighting may be required during the decommissioning process for worker safety and efficient site restoration. Such lighting would be limited to short-term periods, focused on the immediate work area, and shielded or directed downward to the extent feasible, thus minimizing potential off-site impacts. The project’s Site Maintenance standards minimize potential nuisances by ensuring the timely removal of unnecessary equipment or visual disturbances. No new permanent facilities or features are proposed that would introduce substantial sources of light or glare.

Moreover, any new or existing lighting would be subject to County standards and regulations—such as the Rural Outdoor Lighting District Ordinance—to ensure appropriate shielding, directionality, and intensity control. Compliance with these standards helps prevent light trespass and reduces potential night sky illumination.

Overall, the project would not create a new source of substantial light or glare that would adversely affect day or nighttime views. Instead, it would likely result in a net reduction of glare and artificial light compared to existing conditions, rendering any impacts less than significant.

## II. Agriculture and Forestry

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
<p>In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.</p>				
<p>Would the project:</p>				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

**No Impact.** The project involves phasing out oil production activities and does not authorize any new development that would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. Project activities are limited to previously developed, industrialized sites where oil wells and related infrastructure are currently or were historically located. Since the project does not propose extending into agricultural lands or altering existing farmland operations, no agricultural soils designated as Prime, Unique, or of Statewide Importance

would be converted to urban or non-farming uses. Therefore, there is no impact related to the conversion of important farmland.

b. Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?

**No Impact.** The project would phase out oil production activities and remove associated infrastructure within unincorporated Los Angeles County. It does not involve new development that would convert or conflict with agricultural uses, nor does it introduce land uses incompatible with agricultural zoning, designated Agricultural Resource Areas (ARAs), or Williamson Act contracts.

The project does not propose converting farmland to non-agricultural uses or altering lands currently zoned for agriculture. Instead, it focuses on decommissioning oil wells and related equipment on sites already devoted to industrial energy production. As such, there is no encroachment into ARA lands or conversion of prime farmland, Farmland of Statewide Importance, Farmland of Local Importance, or Unique Farmland to other uses. The project's activities remain consistent with existing regulations and do not impede or interfere with agricultural operations.

The only remaining contracts under the Williamson Act in the County are located on Catalina Island and primarily serve as open space set-asides. Since the project does not affect these contract lands or other properties under the Williamson Act, there is no conflict with such agreements.

Given that the project neither alters agricultural zoning nor conflicts with ARAs or Williamson Act contracts, the impact related to agricultural land use designations and agreements is considered less than significant.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

**No Impact.** The unincorporated areas of Los Angeles County do not include any zones designated solely for forest land, timberland, or timberland production as defined in Public Resources Code §§12220(g), 4526, and Government Code §51104(g). The project involves phasing out oil production activities and removing associated infrastructure from existing industrially used areas, without introducing new uses that would require rezoning to or from forest or timberland designations.

While the County does contain portions of National Forests, the project does not propose any activities within or adjacent to these federal forest lands that would necessitate rezoning or conflict with existing forest management objectives. Additionally, no timberland production zones (TPZ) exist in the unincorporated areas governed by the project's proposed regulations.

Since the project does not involve changes to forest- or timberland-related zoning, nor does it require the conversion, removal, or rezoning of such lands, there is no potential to conflict with existing zoning for forest or timberland uses. Therefore, the project has no impact regarding forest land and timberland zoning.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

**No Impact.** The project involves decommissioning oil production infrastructure in unincorporated areas that are generally not characterized as forest land. The County does not have zoning designations strictly for forest land or timberland production in these project locations, and the sites in question are previously disturbed oil fields rather than forested tracts. Because no forested areas or timberland-zoned parcels would be affected by the project, there is no potential for converting forest land to non-forest use. As a result, no impact to forest resources would occur.

- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

**No Impact.** The project does not introduce new land uses, infrastructure, or policies that would indirectly pressure farmland or forest land to convert to another use. It does not entail expanding urban services, constructing roads into rural areas, or altering land use designations in ways that encourage development in areas currently used or zoned for farming or forestry. Instead, the project removes oil wells and industrial features from already disturbed sites, reducing rather than increasing the likelihood of encroaching into agricultural or forested regions. Therefore, there are no foreseeable indirect changes that would prompt farmland or forest land conversion, resulting in no impact.

### III. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a. Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Conflict with or obstruct implementation of applicable air quality plans of either the South Coast AQMD (SCAQMD) or the Antelope Valley AQMD (AVAQMD)?

**Less than Significant Impact.** The project would eliminate oil production activities in unincorporated Los Angeles County, effectively reducing emissions associated with active wells and related infrastructure. Oil production operations typically release criteria pollutants (e.g., volatile organic compounds [VOCs], particulate matter [PM10 and PM2.5], and nitrogen oxides [NOx]) as well as methane, a potent greenhouse gas that also contributes to regional air quality concerns. The State of California, through agencies such as the California Air Resources Board (CARB) and the California Energy Commission, has identified methane leaks from active, idle, and abandoned oil wells as significant sources of emissions. By mandating that all California Geologic Energy Management Division (CalGEM) requirements be fulfilled related to the plugging and abandonment of a well, the project would help minimize or eliminate methane emissions from aging and improperly sealed wells. By phasing out and mitigating these sources of emissions, the project aligns with ongoing state research and mitigation priorities and directly supports the overall objectives of the South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) to improve air quality and meet or maintain state and federal ambient air quality standards.

Both the SCAQMD and AVAQMD rely on Air Quality Management Plans (AQMPs) to guide strategies for reducing emissions and attaining clean air standards. By eliminating existing and future oil production activities, the project is expected to reduce pollutant loads and thus assist in achieving AQMP goals. In addition, the project is consistent with local and regional land use policies and does not introduce land uses that would increase vehicle miles traveled or population beyond what was envisioned in the General Plan. Therefore, it would not conflict with or obstruct the implementation

of the applicable AQMPs, which rely on consistency with adopted land use plans to project and manage emissions.

Temporary emissions may occur during well decommissioning, primarily from construction equipment. These short-term emissions would be subject to existing regulations and best management practices designed to minimize impacts and would be minimal relative to the long-term reduction in stationary source emissions achieved by the project. Consequently, the project would not conflict with or obstruct the implementation of the SCAQMD or AVAQMD air quality plans, and any temporary emissions during decommissioning would be less than significant.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

**Less than Significant Impact.** The project, which phases out oil production activities in unincorporated areas of Los Angeles County, would ultimately decrease stationary emissions of criteria pollutants. The region is currently non-attainment for several pollutants, including ozone (O<sub>3</sub>), particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and nitrogen dioxide (NO<sub>2</sub>). Oil production operations typically emit volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>)—both ozone precursors—as well as particulate matter. By eliminating these sources, the project would support regional efforts to achieve and maintain compliance with federal and state air quality standards.

While short-term emissions may occur during the decommissioning and closure of wells, these activities would be temporary, localized, and comparatively minor in scale. Such emissions, including limited amounts of NO<sub>x</sub> and PM, would be subject to South Coast Air Quality Management District (SCAQMD) or Antelope Valley Air Quality Management District (VAQMD) regulations, as well as best management practices designed to minimize construction-related air quality impacts. Compliance with these measures ensures that any temporary increases in pollutant emissions are effectively controlled and reduced.

Over the long term, the project removes a recognized source of ongoing emissions, thereby reducing the cumulative pollution burden in an area already designated as non-attainment. Because the project results in an overall net decrease in criteria pollutants over time, rather than a meaningful increase, it does not contribute to a cumulatively considerable net increase of non-attainment pollutants.

Therefore, considering both the temporary, controlled nature of decommissioning emissions and the permanent reduction in ongoing pollutant sources, the project's impact on cumulative non-attainment pollutants would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated Los Angeles County, reducing ongoing emissions of criteria pollutants and other contaminants associated with active wells. Sensitive receptors—such as schools, hospitals, residences, childcare facilities, and senior centers—are more vulnerable to adverse health effects from poor air quality. Currently, oil production operations can generate air pollutants, including volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), which may affect nearby sensitive receptors.

By permanently closing and removing oil production facilities, the project would diminish a source of localized emissions, thereby improving long-term air quality conditions for sensitive receptors in the area. Although short-term construction-related emissions may occur during the decommissioning phase, these temporary increases in pollutants would be limited in duration and spatial extent. Standard dust control measures, proper equipment maintenance, and compliance with South Coast Air Quality Management District (SCAQMD) or Antelope Valley Air Quality Management District (AVAQMD) regulations would minimize these effects. In addition, best management practices (BMPs) can be implemented to further reduce dust and diesel emissions during the removal of existing infrastructure.

No new long-term emission sources would be introduced, and the overall effect of the project would be to reduce, rather than increase, pollutant concentrations in areas where sensitive receptors may be present. Therefore, while there may be minimal, short-term construction-related impacts, they would not be substantial, and the project's long-term benefit of removing a stationary source of air pollution ensures that exposures to sensitive receptors would not be significantly affected. As a result, impacts related to exposing sensitive receptors to substantial pollutant concentrations would be less than significant.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

**Less than Significant Impact.** Oil production activities commonly emit odorous compounds—such as volatile organic compounds (VOCs) and, in some cases, hydrogen sulfide (H<sub>2</sub>S)—that can negatively affect nearby communities. By phasing out and removing oil wells and related infrastructure, the project would eliminate these long-term sources of nuisance odors. This reduction in odorous emissions would improve the quality of life in surrounding areas, particularly where sensitive receptors (e.g., residences, schools, or healthcare facilities) could be affected.

During the short-term decommissioning period, certain activities—such as operation of diesel-powered equipment or soil disturbance—could produce temporary odors. These odors, however, would be localized, transitory, and subject to existing regulations, including South Coast Air Quality Management District (SCAQMD) or Antelope Valley Air Quality Management District (AVAQMD) Rule 402, which prohibits emissions that cause nuisance odors affecting a substantial number of people. Compliance with applicable air quality regulations and best management practices would minimize and control any transient odor issues.

In the long run, the project would substantially reduce the presence of odorous emissions in areas currently affected by oil production activities. As a result, any short-term odors during decommissioning would be minimal, temporary, and managed through adherence to regulatory standards. Therefore, the project's impact related to other emissions, including odors, would be less than significant.

## IV. Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- 
- a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure in unincorporated areas of Los Angeles County. Many existing oil operations occur in areas already disturbed, where native habitats and the sensitive species that depend on them have been substantially altered or displaced. By eliminating a source of ongoing disturbance and pollution, the project is expected to improve ecological conditions over time.

As oil facilities are removed and sites are restored or converted to compatible uses, habitats can recover, allowing native vegetation and wildlife to return. Over the long term, this would create more favorable conditions for candidate, sensitive, or special status species recognized by the California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), or other regulatory agencies. Restoration efforts and compliance with all applicable federal, state, and local environmental regulations—including the California Endangered Species Act (CESA), Federal Endangered Species Act (FESA), and any local Significant Ecological Area (SEA) protections—would ensure that sensitive species and their habitats are protected.

During short-term decommissioning and restoration activities, limited ground disturbance could occur. In instances where sensitive biological resources may be present, the project would implement standard measures such as pre-construction surveys, consultation with CDFW or USFWS, avoidance of active nests or burrows during critical breeding seasons, and adherence to best management practices. These steps would minimize potential impacts and help maintain compliance with protective regulations.

Overall, the project would not adversely affect sensitive species populations. Instead, it would likely result in long-term habitat quality improvements once oil operations cease and disturbed sites are restored. Consequently, potential impacts to candidate, sensitive, or special status species would be less than significant.

- b. Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure in unincorporated areas of Los Angeles County. Many existing oil production sites are in areas already disturbed by industrial activity, limiting the extent and quality of sensitive natural communities—such as riparian habitats, coastal sage scrub, oak woodlands, or non-jurisdictional wetlands—that may be present. By eliminating these industrial uses, the project can improve long-term ecological conditions and increase the potential for these sensitive communities to recover or reestablish.

While short-term decommissioning actions (e.g., equipment staging, limited grading) could temporarily affect adjacent habitat areas, these impacts would be localized and transitory. Prior to and during these activities, compliance with applicable regulations—including any requirements related to Significant Ecological Areas (SEAs) and other protected habitats—would minimize and avoid substantial effects on sensitive natural communities. Such regulations may include conducting

biological surveys, following best management practices to control erosion and dust, and scheduling work to avoid sensitive wildlife breeding periods.

Over time, as oil production infrastructure is removed and sites are restored or converted to more compatible uses, habitats can regenerate and potentially support a greater abundance and diversity of native species. By reducing barriers, contamination, and noise sources, the project is likely to benefit sensitive natural communities in the long run. Therefore, any short-term disturbance during decommissioning would be minimal and controlled, and the overall impact on sensitive natural communities would be less than significant.

- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated areas of Los Angeles County, generally reducing disturbance in areas that may currently be occupied by oil production infrastructure. While these facilities are often located in already disturbed or developed areas, if any state or federally protected wetlands (such as marshes, vernal pools, or coastal wetlands) are present on or near affected sites, they would receive indirect benefits over the long term due to the cessation of industrial activities.

In the near term, decommissioning activities—such as equipment operation or limited grading—could potentially cause minor, localized effects on nearby wetland areas if not properly managed. However, these impacts would be temporary and subject to existing regulatory requirements and best management practices (BMPs) designed to protect wetland resources. Project activities would be required to comply with all applicable federal, state, and local regulations, including those administered by the U.S. Army Corps of Engineers (Clean Water Act Section 404), the California Department of Fish and Wildlife (California Fish and Game Code Sections 1600–1616), and the Regional Water Quality Control Board (Porter-Cologne Water Quality Control Act).

These regulations and permitting requirements ensure that any work occurring near wetlands would be carefully evaluated and, if necessary, mitigated to avoid or minimize adverse impacts. Moreover, without ongoing oil production, the likelihood of long-term hydrological disruptions or contaminant inputs to wetland areas would be reduced. Although the project does not directly mandate restoration of these areas, removing oil operations could facilitate the transition of sites toward more compatible land uses that are less harmful to nearby wetland habitats.

As a result, any short-term effects on wetlands would be adequately controlled, and no substantial adverse impacts are anticipated. Therefore, the project's impact on state or federally protected wetlands would be less than significant.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

**Less than Significant Impact.** Phasing out oil production activities and removing associated infrastructure in unincorporated Los Angeles County would generally reduce barriers to wildlife movement and improve connectivity over time. Oil production operations can fragment habitats, introduce noise and light, and impede wildlife corridors, including the movement of resident and

migratory species, as well as the use of nursery sites. By eliminating these industrial impacts, the project is expected to support habitat conditions more conducive to wildlife movement and breeding.

In the short term, decommissioning activities—such as equipment use, grading, and staging—may temporarily disturb local wildlife movement. These effects would be limited in duration and scope, and would be managed in compliance with federal, state, and local regulations protecting native species. For example, the Migratory Bird Treaty Act and California Fish and Game Code protect active nests and breeding birds from harm or disturbance. Best management practices, including pre-construction surveys and seasonal avoidance measures, can be implemented to prevent impacts to active nests, nursery sites, or established wildlife corridors during decommissioning.

Over the long run, phasing out oil operations can facilitate land uses that are less disruptive to wildlife. While the project does not directly mandate habitat restoration, the cessation of ongoing industrial activities inherently reduces disturbance. This reduction in noise, lighting, and physical barriers would likely enhance habitat connectivity, supporting wildlife corridors and facilitating the safe and unobstructed movement of native and migratory species. As a result, any temporary impacts during the decommissioning phase would be minimal and less than significant.

- e. Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

**Less than Significant Impact.** The project would phase out oil production activities, reducing ongoing disturbances associated with these operations. Oil production sites are often established in previously disturbed areas where oak woodlands or other unique native woodlands have been largely cleared or degraded. As a result, the likelihood of the project directly removing or converting intact oak woodlands or other unique native woodlands (e.g., juniper, Joshua, southern California black walnut) is low.

While the project itself does not mandate restoration, eliminating oil operations may reduce barriers and pressures on nearby natural communities. Any future uses of these sites would still be subject to existing local and state regulations designed to protect native woodlands, including oak trees. Should oak trees or native woodlands be present, compliance with relevant ordinances (such as the Oak Tree Permit Ordinance) and consultation with County biologists would ensure that avoidance, minimization, or mitigation measures are employed as needed. This would prevent significant impacts to oak woodlands or other native woodlands.

Therefore, any potential impacts related to converting oak woodlands or other unique native woodlands would be less than significant.

- f. Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure in unincorporated Los Angeles County, thereby reducing industrial

disturbances that can affect local biological resources. While the project itself does not mandate restoration, the cessation of oil operations creates conditions more favorable to uses that are compatible with local policies and ordinances designed to protect biological resources.

- Wildflower Reserve Areas (Title 12, Ch. 12.36): The project is not expected to affect these designated areas, as oil facilities are generally not located within them. By removing oil operations, adjacent natural landscapes can be maintained or improved, supporting the integrity of wildflower areas.
- Oak Tree Permit Ordinance (Title 22, Ch. 22.174): Should any oak trees or oak woodlands be present on or adjacent to former oil production sites, future site activities would be subject to the Oak Tree Ordinance, including any required permits, mitigation, and best management practices. Compliance with these requirements ensures no substantial conflict with oak tree protections.
- Significant Ecological Areas (SEAs) (Title 22, Ch. 102): Eliminating oil production can reduce habitat fragmentation and improve ecological integrity within or near SEAs. Any future use of these sites would need to comply with SEA regulations, ensuring that sensitive habitats and species are protected.
- Specific plans and community standards districts (CSDs) (Title 22, Divisions 10 and 11): The project is consistent with relevant specific plans and CSD requirements, including those that regulate oil production. By ending such activities, the project aligns with long-term planning goals that often emphasize environmental protection.

Decommissioning activities may produce short-term, localized effects, but these would be managed under existing regulations and permit requirements to avoid conflicts with local environmental protections. Overall, the project supports rather than conflicts with local policies and ordinances aimed at conserving biological resources. Any temporary impacts would be less than significant, as ongoing compliance with existing regulations ensures effective protection of sensitive habitats and species.

**g. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?**

**No Impact.** The project would phase out oil production activities in unincorporated Los Angeles County, potentially reducing disturbances that could conflict with habitat conservation efforts. Currently, there are several habitat conservation and natural community conservation plans at the state, regional, and local levels, as well as other conservation initiatives (such as the County's SEAs Program) that aim to maintain and restore ecological integrity within the County.

By discontinuing oil production, the project would lessen industrial impacts, such as noise, habitat fragmentation, and potential contamination, thereby aligning more closely with the goals and provisions of these conservation plans. Even though the project does not mandate restoration, transitioning away from oil production allows for future land uses that are more compatible with habitat conservation objectives. Any site-specific changes would continue to be subject to applicable laws, permits, and ordinances that protect biological resources. Should any Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or similar conservation framework apply, project-related activities would need to comply with all related requirements, including consultation with the appropriate regulatory agencies if necessary.

In the short term, limited construction-related activities associated with decommissioning may occur, but these would be regulated by existing environmental protections and best management

practices to minimize any potential adverse effects. In the long term, the reduction of industrial activities supports the conservation objectives of these plans rather than conflicts with them.

Therefore, the project would not conflict with adopted HCPs, NCCPs, or other approved habitat conservation strategies, and impacts would be less than significant.

## V. Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

**Less than Significant Impact.** The project would phase out oil production activities without proposing physical alterations or removal of historical resources in unincorporated Los Angeles County. Most affected areas are previously disturbed sites, limiting historical features. However, two notable exceptions require consideration.

Within the Baldwin Hills area, the Cone Trust House is recognized as a potentially significant historic architectural resource. The Baldwin Hills Community Standards District (CSD) includes measures to protect the structure’s historic integrity from adjacent oil operations. These protections would remain under the project, ensuring no substantial adverse change to the Cone Trust House.

Another key site is Well No. 4 in the Pico Canyon Oil Field, located approximately seven miles west of Newhall, California, within the Santa Susana Mountains. Drilled in 1876, this well became California’s first commercially successful oil well, spurring the growth of the state’s petroleum industry. Well No. 4 is designated as a National Historic Landmark (NHL), listed on the National Register of Historic Places (NRHP), and designated as a California Historical Landmark (CHL), recognizing its cultural and industrial significance. The project prohibits new wells and phases out existing ones without requiring the demolition, relocation, or physical alteration of Well No. 4 or its contributing historical features.

Any future actions affecting Well No. 4, such as permanent modifications to structures contributing to its historical character, would be subject to review under federal and state preservation laws. Section 106 of the National Historic Preservation Act (NHPA) requires a review when a federal agency funds, permits, licenses, or approves an action that could affect historic properties. This review process involves identifying historic resources, assessing potential impacts, and consulting with stakeholders to resolve adverse effects, ensuring Well No. 4’s historical integrity remains intact. At the state level, the California Environmental Quality Act (CEQA) requires agencies to evaluate and mitigate significant environmental impacts, including those affecting historical resources. Any action involving modifications to Well No. 4 would require separate environmental review under

CEQA to assess potential impacts on its historical significance. Since Well No. 4 was plugged and abandoned in September 1990 after 114 years of operation, this project itself would not require any further modifications to the site.

Outside of these two identified resources, the project affects highly disturbed oil-related sites that do not appear to host intact historic structures or features. If any such sites contain a previously unidentified historical resource, CEQA Guidelines Section 15064.5 requires evaluation and mitigation to prevent harm to the resource's integrity. Because the project aims to phase out oil extraction operations without authorizing new development or encouraging major construction, it would not result in physical alterations to potential historic buildings or districts.

The project does not facilitate direct changes to recognized historic resources, and any future actions requiring physical modifications at Well No. 4 or the Cone Trust House would be subject to separate evaluation and regulatory oversight. As a result, the project would not cause a substantial adverse change to a known historical resource, and any impact related to historical resources under CEQA is considered less than significant.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

**Less than Significant Impact.** The project would eliminate oil production activities in unincorporated Los Angeles County, focusing on areas already disturbed by industrial operations. Such sites are generally considered to have a lower likelihood of containing intact archaeological resources due to previous ground disturbance.

Where applicable, existing regulations and requirements—such as those established by the Baldwin Hills Community Standards District (CSD)—provide protection for archaeological resources. For example, within the Baldwin Hills Oil Field, construction personnel must receive archaeological training, ensuring that potential discoveries are handled appropriately. If previously unidentified archaeological materials are encountered during ground-disturbing activities, work would be halted in the immediate area until a qualified archaeologist, approved by the Department of Regional Planning, evaluates the find and recommends any necessary treatment or mitigation measures.

In addition, if any portion of the project site is located in an area with a known potential for archaeological resources, standard best management practices and compliance with General Plan mitigation measures (such as consulting the South Central Coastal Information Center and adhering to applicable CEQA guidelines) would be followed. These measures ensure that any significant archaeological materials are identified, evaluated, and protected as required by law.

Because the project does not involve new development in previously undisturbed areas, and due to the regulatory framework and requirements in place, the potential for a substantial adverse change in the significance of an archaeological resource is minimal. Therefore, impacts would be less than significant.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated areas of Los Angeles County, affecting sites that have largely been subject to past ground disturbance. Such disturbed industrial landscapes present a low likelihood of containing

intact paleontological resources or unique geologic features. Consequently, it is unlikely that discontinuing oil production and removing associated infrastructure would directly or indirectly destroy these types of resources.

If future site activities involve ground disturbance, standard procedures and best management practices would apply. For example, if a project component were to involve grading more than six feet in depth, compliance with General Plan Mitigation Monitoring and Reporting Program (MMRP) measures, such as CULT-5, may require a qualified paleontologist to monitor grading and excavation activities. Additionally, if there is any indication that paleontological resources could be present, the applicant would be advised to consult with the Natural History Museum of Los Angeles County (NHM) to determine the potential for such resources. If any fossils or unique geologic features are unexpectedly discovered during project activities, work would be halted until a qualified paleontologist has evaluated the find and implemented appropriate treatment or mitigation measures.

Overall, because the project affects previously disturbed sites and includes provisions for compliance with relevant regulations and procedures, it would not result in a substantial adverse effect on paleontological resources or unique geologic features. Therefore, the impact would be less than significant.

d. Disturb any human remains, including those interred outside of dedicated cemeteries?

**Less than Significant Impact.** The project would phase out oil production activities in areas that have largely been disturbed by previous industrial use, making the discovery of human remains on-site unlikely. If any ground-disturbing activities occur during decommissioning, standard procedures are in place should human remains be unexpectedly encountered. In accordance with California Health and Safety Code § 7050.5, work in the vicinity of the find would stop immediately, and the County Coroner would be notified. If the Coroner determines the remains are Native American, the Native American Heritage Commission would be contacted, and consultation with the most likely descendant would guide the appropriate treatment of the remains, as required by Public Resources Code § 5097.98.

Because the project area consists of previously disturbed industrial sites and due to the regulatory protocols that must be followed if human remains are encountered, the potential for significant impacts is very low. Any impact related to disturbing human remains would be less than significant.

VI. Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated Los Angeles County, thereby reducing long-term energy demands associated with drilling, pumping, and processing. While short-term construction-related energy use would occur during the decommissioning of oil wells and associated infrastructure, these activities would be limited in duration and scope. The temporary use of fuel and electricity during this phase would be typical of standard construction practices and not considered wasteful or inefficient.

Moreover, no new energy-intensive operations are proposed as part of the project. Once oil production ceases, the eliminated industrial activities would substantially decrease on-site energy consumption, aligning with local and state objectives to reduce reliance on nonrenewable energy sources. Any subsequent land uses would remain subject to applicable energy efficiency requirements, such as those in the California Green Building Standards Code (CALGreen) and Los Angeles County’s Green Building Standards (Title 31), further ensuring energy conservation in future development scenarios.

Given that decommissioning activities represent a temporary and necessary energy use and considering the long-term reduction in energy demand resulting from the cessation of oil production, the project would not lead to wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, impacts would be less than significant.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated Los Angeles County, thereby reducing energy consumption tied to fossil fuel production and supporting the state’s and County’s overarching goals for energy efficiency and renewable energy development. By eliminating oil pumping and processing operations, the project inherently aligns with California’s Renewable Portfolio Standard (RPS) and Senate Bill 100, which seek to transition the state’s electricity supply to 100% renewable energy by 2045. The project supports the Los Angeles County Climate Action Plan objectives to reduce greenhouse gas emissions and transition to sustainable land uses. By phasing out oil operations, the project helps achieve the County’s energy and sustainability targets.

In addition, any subsequent activities on the project sites would be subject to existing energy efficiency standards set forth by Title 24 of the California Code of Regulations and Los Angeles County Green Building Standards Code. These requirements ensure that future developments or uses of the property maintain high standards of energy efficiency, further advancing state and local energy conservation objectives.

Because the project would not introduce any new energy-intensive operations and would remove existing fossil fuel extraction activities, it would not conflict with or obstruct state or local renewable energy or energy efficiency plans. Instead, it supports the broader transition toward sustainable energy use, resulting in a less than significant impact.

## VII. Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a. (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map or known fault?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure in unincorporated areas of Los Angeles County. While the region is seismically active and includes numerous known faults (such as the Newport-Inglewood Fault Zone, among others), the project does not involve the construction of new habitable structures that could be subject to fault rupture hazards. Instead, it reduces the number of operational oil facilities that might otherwise be at risk.

In areas subject to the Alquist-Priolo Earthquake Fault Zoning Act, new structures for human occupancy are prohibited from being placed directly on active fault traces. Because the project does not authorize new construction for human occupancy, it avoids increasing exposure to fault rupture hazards. Any decommissioning activities (e.g., plugging wells, removing equipment) would be temporary, localized, and would comply with all applicable safety regulations and standard engineering practices. If any future site redevelopment occurs after oil operations cease, it would be subject to existing seismic safety regulations—including fault rupture avoidance measures—as required by the California Building Code and County ordinances.

By removing industrial infrastructure rather than adding new structures, the project effectively reduces the overall level of seismic risk on affected sites. Adherence to existing regulatory frameworks and best management practices ensures that the project does not expose people or new structures to significant fault rupture hazards. Therefore, impacts related to the rupture of a known earthquake fault would be less than significant.

(ii) Strong seismic ground shaking?

**Less than Significant Impact.** The project would phase out oil production activities and remove related infrastructure in unincorporated Los Angeles County. While the region is seismically active and could experience strong ground shaking during an earthquake, the project does not involve constructing new habitable buildings or increasing the number of people exposed to seismic hazards. Instead, it focuses on plugging and abandoning oil wells and removing industrial equipment associated with oil production.

Any decommissioning activities would be short-term, localized, and conducted under standard safety protocols. Because no new permanent structures for human occupancy would be added, the project does not increase exposure to strong seismic ground shaking. If future redevelopment occurs on these sites, such projects would be subject to the latest California Building Code and County regulations governing seismic design, ensuring that any new development is adequately designed to resist ground shaking.

By reducing industrial infrastructure rather than adding new sensitive uses, the project does not introduce new risks associated with strong seismic ground shaking. Therefore, impacts related to this hazard would be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

**Less than Significant Impact.** Some areas in unincorporated Los Angeles County are identified as liquefaction zones, where water-saturated, loose soils could lose strength during intense seismic activity. While portions of the project area may be prone to liquefaction, the project does not involve constructing new buildings or otherwise placing additional people or sensitive structures at risk. Instead, it would phase out and remove existing oil production infrastructure, activities which are limited in duration, occur primarily on already-disturbed sites, and do not substantially alter subsurface conditions.

Temporary ground-disturbing activities associated with decommissioning (e.g., removal of wells and equipment per all California Geologic Energy Management Division (CalGEM) requirements for plugging and abandonment) would be conducted in compliance with applicable seismic safety regulations and standard engineering practices. If site-specific conditions warrant, all project

activities would follow existing state and local requirements for addressing liquefaction risks, such as conducting geotechnical investigations prior to any substantial ground disturbance and implementing recommended stabilization or compaction measures.

Because the project does not introduce new habitable structures or long-term uses that could be adversely affected by liquefaction, and since any temporary work would comply with established safety protocols, the potential impact related to seismic-induced ground failure, including liquefaction, would be less than significant.

(iv) Landslides?

**Less than Significant Impact.** Some areas of unincorporated Los Angeles County, including portions of the Baldwin Hills, contain steep slopes or unstable terrain that may be subject to landslides, particularly during significant seismic events or heavy rainfall. However, the project does not involve constructing new buildings or conducting extensive grading that could destabilize slopes or increase landslide risk.

Instead, the project focuses on phasing out and removing existing oil production infrastructure. Ground-disturbing activities associated with well plugging, equipment removal, or minor grading for site restoration would be limited in scope and duration and would occur on sites previously disturbed by industrial operations. Compliance with standard construction practices, erosion control measures, and applicable California Building Code requirements would ensure that any temporary soil disturbance does not exacerbate landslide conditions. If necessary, site-specific evaluations and recommended stabilization measures would be implemented before and during decommissioning.

In the long term, removing oil production facilities may reduce the number of structures potentially affected by landslides and allow for restoration activities that improve slope stability (e.g., proper grading, revegetation). Because the project does not introduce new habitable structures or uses that would increase exposure to landslide hazards, and because all activities would adhere to existing regulations and best management practices, impacts related to landslides would be less than significant.

b. Result in substantial soil erosion or the loss of topsoil?

**Less than Significant Impact.** The project would phase out oil production activities and remove existing industrial infrastructure in unincorporated Los Angeles County. While limited ground-disturbing activities—such as grading, excavation, and equipment removal—may temporarily increase the potential for soil erosion, these activities would be short-term, localized, and occur primarily within previously disturbed, compacted industrial sites. Consequently, the likelihood of substantial topsoil loss is reduced.

To ensure protection against erosion, decommissioning activities must comply with applicable regulations and standard industry practices. For instance, if ground-disturbing activities exceed one acre, the project would need a Stormwater Pollution Prevention Plan (SWPPP) as part of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit. Such a plan typically includes best management practices (BMPs) like silt fencing, fiber rolls, or stabilized construction entrances to minimize sediment runoff. Additionally, the Los Angeles County Grading Code and the County's Low Impact Development (LID) Ordinance provide guidelines and requirements that limit soil erosion and manage stormwater runoff effectively.

Following decommissioning, any subsequent site restoration or conversion—such as regrading, revegetation, or properly engineered construction—would help stabilize soils, reduce erosion potential, and prevent long-term topsoil loss. Because the project involves only temporary ground disturbance and must adhere to existing regulatory requirements designed to prevent erosion, impacts related to soil erosion or loss of topsoil would be less than significant.

- c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure in areas already characterized by industrial disturbances. These sites have typically undergone previous grading, compaction, and other alterations to the natural soil profile. Since the project does not involve the construction of new, habitable structures or major grading that could create large new slopes or significantly alter the subsurface conditions, it is not expected to induce instability in underlying geologic units.

Some portions of unincorporated Los Angeles County may contain soils prone to subsidence, liquefaction, or lateral spreading, particularly those in proximity to historic oil extraction sites. However, by ending extraction activities, the project would help reduce future risks of subsidence associated with ongoing resource removal. Any temporary ground disturbance related to the plugging of wells or removal of infrastructure would be limited in scope and duration, and would comply with relevant building codes, seismic safety requirements, and grading regulations. Where necessary, site-specific investigations and engineering measures would be implemented to ensure that no significant instability is introduced. Over time, as oil operations cease, regrading and potential revegetation would help stabilize soils and slopes, improving long-term geotechnical conditions.

Because the project does not create new instability risks and instead reduces activities that can contribute to subsidence or soil weakening, the potential for on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse would be less than significant.

- d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

**Less than Significant Impact.** Some areas within unincorporated Los Angeles County may contain expansive soils, which swell or shrink with changes in moisture content. Such soils can pose a risk to structures if not properly managed. However, the project involves the phased cessation of oil production activities and the removal of existing industrial infrastructure—actions that generally reduce long-term structural risks rather than increase them. The project does not propose new habitable structures that would be susceptible to damage from expansive soils.

Any ground-disturbing activities associated with well plugging, equipment removal, or minor grading would be short-term and localized. Standard industry practices and compliance with the California Building Code and County grading ordinances would address potential soil stability issues, including those posed by expansive soils. If future uses are proposed on these sites, they would be subject to site-specific geotechnical evaluations and compliance with applicable engineering standards to ensure that soil conditions, including expansion potential, do not create substantial risks to life or property.

As a result, the project's activities would not lead to significant hazards associated with expansive soils. Any impact would be less than significant.

- e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

**No Impact.** The project would phase out oil production activities in unincorporated Los Angeles County and does not involve new development or operations requiring on-site wastewater treatment systems such as septic tanks or alternative disposal methods. Therefore, the suitability of soils for supporting such systems is not a concern under this project.

If any limited, temporary wastewater needs arise during decommissioning (e.g., portable restrooms for workers), these would be managed through permitted and regulated services that do not rely on permanent on-site disposal systems. No new septic systems or alternative wastewater disposal facilities are proposed.

Since the project does not depend on soils for wastewater disposal, no impacts related to soils incapable of supporting septic tanks or similar systems would occur.

- f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure at previously disturbed, industrialized sites in unincorporated Los Angeles County. Due to the long history of ground disturbance in these areas, the likelihood of encountering previously undisturbed paleontological resources or unique geologic features is low.

If any ground-disturbing activities occur, such as limited grading or excavation, they would be short-term and confined to already modified soils. Should previously unknown fossils or unique geological formations be encountered during decommissioning, standard procedures would be followed, including temporarily halting work in the immediate vicinity and consulting with a qualified paleontologist or geologist to evaluate the find and recommend appropriate treatment. Compliance with applicable local and state regulations ensures that such discoveries would be handled with care and properly documented, reducing any potential impact to a less than significant level.

Because the project would not introduce new large-scale development or require extensive grading in undisturbed areas, and due to compliance with established regulations and protocols, the potential for directly or indirectly destroying unique paleontological resources or unique geologic features is less than significant.

- g. Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?

**No Impact.** The project, which phases out oil production activities in unincorporated Los Angeles County, aligns with the objectives of the Hillside Management Area (HMA) Ordinance and is not expected to conflict with its provisions. The HMA Ordinance is designed to preserve the physical integrity, scenic value, and open space of hillside areas while ensuring development is compatible with community character.

Phasing out oil production activities supports the goals of the HMA Ordinance by reducing industrial impacts on hillside areas and improving scenic and environmental values. Restoration or conversion activities, such as regrading and revegetation, may help stabilize soils, reduce erosion, and enhance the natural landscape, further aligning with the ordinance's open space preservation goals.

The project does not propose new construction, grading-intensive activities, or development that would trigger the Conditional Use Permit (CUP) requirements under the HMA Ordinance. This avoids conflicts related to building placement, hillside grading, or scenic view disruption. Grading activities required for the removal of oil wells and associated facilities will adhere to all local regulations to minimize impacts. These activities are temporary and aim to restore, rather than alter, natural landforms. The project does not propose large-scale grading or landform changes that would affect the scenic or physical integrity of HMAs. The removal of oil wells and production facilities aligns with the HMA Ordinance's requirement to enhance the aesthetic value of hillside areas.

Per Section 22.104.030(H), development related to oil and gas production in the Baldwin Hills Community Standards District (CSD) is exempt from the HMA Ordinance CUP requirement, provided compliance with the provisions of the CSD.

The project supports the objectives of the Hillside Management Area Ordinance by phasing out industrial activities, restoring natural landscapes, and preserving scenic and physical hillside integrity. Temporary impacts during decommissioning are limited and managed in compliance with applicable regulations. Therefore, the project does not conflict with the provisions of the ordinance, and impacts are less than significant.

## VIII. Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Generate greenhouse gas (GHGs) emissions, either directly or indirectly, that may have a significant impact on the environment?

**Less than Significant Impact.** The project, which phases out oil production activities in unincorporated Los Angeles County, is not expected to result in significant greenhouse gas (GHG) emissions. While temporary GHG emissions will be generated during decommissioning activities, the project’s long-term benefits include the elimination of operational GHG emissions from oil production, aligning with state and local GHG reduction goals.

While the phase-out of local oil production could result in increased reliance on imported oil in the short term, potentially increasing GHG emissions from transport and production, the project supports long-term climate goals by reducing regional emissions and fostering a transition away from fossil fuels. The extent to which reliance on imported oil might increase, and the duration of any resulting GHG increase, is uncertain and dependent on factors like market dynamics, energy policies, and shifts in demand for oil. The project itself does not directly cause an increase in oil imports—it contributes to transitioning away from fossil fuel dependence.

Decommissioning activities will involve the use of heavy machinery, equipment, and vehicles, which emit GHGs such as carbon dioxide (CO<sub>2</sub>) and nitrous oxide (N<sub>2</sub>O) through fuel combustion. Transportation of materials, equipment, and waste to and from project sites will also contribute to temporary emissions. These emissions are limited to the duration of decommissioning activities, which are temporary and localized.

Oil production activities produce significant GHG emissions from processes such as pumping, refining, and transporting oil. Methane, a potent greenhouse gas, is also released during extraction. By phasing out oil production, the project eliminates these operational sources of emissions, providing a substantial and lasting reduction in the region’s GHG footprint. Proper decommissioning of oil wells will seal and close wells, reducing the risk of methane leaks from abandoned or improperly managed wells, which are a significant source of GHG emissions.

The project supports California’s GHG reduction targets outlined in Assembly Bill (AB) 32, Senate Bill (SB) 32, and Executive Order B-55-18, which aim to reduce emissions and achieve carbon neutrality by 2045. The project aligns with the County’s Climate Action Plan (CAP) by contributing to reduced fossil fuel use, lowering emissions, and supporting transitions to more sustainable land uses. Given the temporary nature of decommissioning activities and the long-term cessation of oil

operations, GHG emissions generated by the project are expected to remain below the relevant thresholds (South Coast and Antelope Valley Air Quality Monitoring Districts).

While the project will generate temporary GHG emissions during decommissioning, these emissions are not significant when compared to the long-term reductions achieved by eliminating oil production operations. The project aligns with state and local climate action goals and does not generate GHG emissions at a level that would significantly impact the environment. Therefore, impacts are less than significant.

- b. Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

**Less than Significant Impact.** The project would phase out oil production activities in unincorporated Los Angeles County. Although decommissioning efforts will temporarily generate greenhouse gas (GHG) emissions from construction equipment, trucks, and associated activities, these emissions would be short-term and limited in scope. No new operational sources of GHGs would be introduced once oil production ceases.

In the long term, ending oil production reduces a significant source of regional GHG emissions. Oil production processes release substantial amounts of carbon dioxide (CO<sub>2</sub>) and methane (CH<sub>4</sub>), both potent greenhouse gases. By decommissioning wells, sealing them properly, and removing facilities that support fossil fuel production, the project directly contributes to reducing these emissions. Over time, this aligns with California's overarching GHG reduction goals as set forth in Assembly Bill 32, Senate Bill 32, and Executive Orders aimed at carbon neutrality. It also supports the transition away from fossil fuels, consistent with the General Plan and 2045 Climate Action Plan (2045 CAP).

The 2045 CAP guides the County's approach to decreasing GHG emissions through various strategies and is part of the Air Quality Element of the General Plan. The project's elimination of a GHG-intensive industrial activity (oil production) is consistent with the County's climate policies, which encourage reducing reliance on fossil fuels and lowering overall GHG emissions. Additionally, because the project does not involve adding new GHG-generating uses and is consistent with the General Plan's designated land use and density, it may rely on the existing framework and analysis provided in the 2045 CAP. Thus, a separate, project-level GHG emissions analysis is not required under CEQA Guidelines Section 15183.5.

In summary, while minor, temporary GHG emissions would occur during decommissioning, the project facilitates long-term GHG reductions by permanently removing oil production operations. Therefore, any GHG emissions impact would be less than significant.

## IX. Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located:				
i) within a high fire hazard area with inadequate access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) within an area with inadequate water and pressure to meet fire flow standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) within proximity to land uses that have the potential for dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Does the proposed use constitute a potentially dangerous fire hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

**Less than Significant Impact.** The project would phase out oil production activities at previously industrialized sites in unincorporated Los Angeles County. Decommissioning oil wells and related

facilities may involve handling hazardous substances commonly associated with oil production, including residual hydrocarbons, drilling fluids, and possibly Naturally Occurring Radioactive Materials (NORM) on equipment. However, these activities would be temporary and subject to stringent regulatory controls.

All hazardous materials handling, storage, and transport would be conducted in accordance with state and federal regulations administered by agencies such as the Department of Toxic Substances Control (DTSC) and the Los Angeles County Fire Department's Health Hazardous Materials Division. Compliance with the Resource Conservation and Recovery Act (RCRA), the California Hazardous Waste Control Law, and other applicable regulations ensure that hazardous materials are properly identified, packaged, documented, and transported to permitted disposal or treatment facilities by licensed hazardous waste haulers. The project's integrated Site Maintenance requirements and Well Plugging and Abandonment standards ensure that any stored or transported hazardous materials are promptly cleaned up or removed, eliminating their long-term presence on-site. These regulations, combined with the project's new Bonds requirement, provide an additional layer of assurance that site remediation and proper waste disposal will be funded if an operator fails to act.

If any contaminated soil or materials are encountered, they would be handled following established protocols, including proper containment and disposal at approved facilities, to prevent releases that could harm the public or the environment. Given the oversight, best management practices, and emergency response plans in place, routine transport, use, and disposal of hazardous materials during decommissioning would not create a significant hazard.

No new long-term operations involving hazardous materials are proposed. Eliminating oil production activities would ultimately reduce the quantity of hazardous materials managed on-site over the long run. Therefore, any impacts related to hazardous materials handling and disposal during the project's limited decommissioning phase would be less than significant.

- b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

**Less than Significant Impact.** Decommissioning oil production facilities in unincorporated Los Angeles may involve handling potentially hazardous substances such as residual hydrocarbons, drilling fluids, and contaminated soil. While the presence of these materials carries some risk, the potential for accidents or unplanned releases is minimized through stringent regulatory oversight, established safety protocols, and best management practices.

Before and during decommissioning, operators must comply with applicable federal, state, and local regulations designed to prevent the release of hazardous materials. These regulations include requirements set forth by the California Geologic Energy Management Division (CalGEM) for proper well abandonment, and by the Department of Toxic Substances Control (DTSC) and the Los Angeles County Fire Department's Health Hazardous Materials Division for managing hazardous waste. Activities are conducted in accordance with approved hazardous materials handling plans, spill prevention and response measures, and ongoing inspections to ensure compliance.

The project's safety measures—particularly those required by Site Maintenance and Well Plugging and Abandonment provisions—mitigate the potential for releases. These standards require site operators to keep the vicinity free of oil pools or debris, promptly address spills, and remove

unnneeded pipelines and equipment once wells are no longer in use. The project's Complaint and Comment Log requirement also provides an avenue for reporting any release or accidental spill, ensuring rapid response and corrective action.

If unknown contaminants are discovered, work would cease in the affected area until the material is characterized and removed in accordance with regulatory standards. Licensed hazardous waste haulers and permitted disposal facilities would be used for transporting and disposing of hazardous materials, reducing the likelihood of accidental releases during transport.

In the long run, by permanently phasing out oil operations, the project would eliminate ongoing risks associated with active extraction, storage, and processing of oil and related hazardous substances. Consequently, the potential for future accidents involving hazardous materials would be substantially reduced.

Given the robust regulatory framework, required safety measures, and careful handling procedures, the risk of creating a significant hazard to the public or the environment through accidental release of hazardous materials is minimized. Therefore, impacts would be less than significant.

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

**Less than Significant Impact.** Decommissioning oil production facilities in unincorporated Los Angeles County may require the handling of hazardous materials associated with well abandonment and infrastructure removal. These could include residual hydrocarbons, drilling fluids, contaminated soil, and other materials typical of oil production sites. Although such materials are hazardous, their handling is strictly regulated by federal, state, and local agencies, ensuring proper containment, transport, and disposal. Compliance with regulations under the California Hazardous Waste Control Law and oversight by the Los Angeles County Fire Department's Health Hazardous Materials Division would minimize any potential exposure risk. Compliance with the project's Site Maintenance provisions helps ensure proper containment, rapid spill response, and removal of materials that could pose risks to nearby sensitive receptors. Further, the project's Complaint and Comment Log requirement facilitates quick reporting and resolution of any issue related to emissions or potential exposures.

If sensitive land uses (e.g., residences, schools, healthcare facilities, daycare centers, or parks) exist within one-quarter mile of a project site, project activities would still be subject to stringent safety protocols designed to prevent hazardous emissions or releases. Standard best management practices—such as covering haul trucks, using spill containment measures, and implementing proper storage and disposal methods—would be employed to ensure that hazardous materials are handled safely and do not pose a risk to nearby sensitive populations.

Because the project does not introduce new long-term operations involving hazardous materials and is focused on removing existing petroleum-related infrastructure, any potential hazardous material handling would be temporary, controlled, and closely monitored. Given the robust regulatory framework and implementation of best management practices, the likelihood of hazardous emissions or materials affecting sensitive land uses within a quarter mile is very low. Therefore, impacts would be less than significant.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Less than Significant Impact.** Some oil production sites within unincorporated Los Angeles County may be listed under Government Code § 65962.5 (often referred to as the Cortese List) due to past operations that potentially contaminated soil or groundwater with hazardous substances. However, the project would not introduce new contaminating activities; rather, it would phase out oil production and result in the removal of appurtenant infrastructure from affected sites.

If an oil production site is listed on the Cortese List, it would already be subject to investigation and cleanup requirements overseen by agencies such as the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB). Decommissioning and closure of oil wells, along with any required remediation, would follow applicable environmental regulations and established protocols to ensure that contaminated soils or other hazardous materials are handled and disposed of properly. The California Geologic Energy Management Division (CalGEM) standards for well abandonment, in conjunction with the DTSC oversight and compliance with the Resource Conservation and Recovery Act (RCRA), ensure that these operations mitigate existing hazards. The project further regulates these activities via its integrated Well Plugging and Abandonment and Bonds provisions, ensuring that operators or the County have sufficient resources to carry out remediation if contamination is discovered or if the operator fails to remediate a site. These measures bolster existing investigative and cleanup requirements under DTSC and RWQCB oversight.

By safely removing or remediating contaminated infrastructure and materials, the project would ultimately reduce long-term risks to the public and the environment. As a result, even if the site is listed on the Cortese List, the project's activities are anticipated to improve, rather than worsen, existing conditions. Therefore, any impacts related to site listings under Government Code § 65962.5 would be less than significant.

- e. For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of associated infrastructure on sites that may or may not be located within an airport land use plan area or within two miles of a public airport. If a site does fall within an airport's area of influence, the activities resulting from the project involve dismantling existing facilities rather than introducing new development or uses that would increase safety hazards or expose people to excessive noise related to airport operations.

Any decommissioning work that may occur near an airport would be temporary and closely regulated. Tall equipment or cranes used during well plugging or facility removal would comply with Federal Aviation Administration (FAA) regulations and any applicable requirements of the local airport land use plan to ensure they do not create airspace obstructions or safety hazards. The project does not propose structures that would conflict with flight paths or increase the density of people living or working near runways or approach/departure zones. Additionally, the project's performance standards—such as the Site Maintenance rules—would keep sites free of debris or tall, unwieldy structures that might pose hazards to aircraft operations.

The cessation of oil production activities would ultimately reduce industrial noise and activity in the area, potentially improving the local noise environment over the long term. Existing regulations and review processes—such as consultation with the Los Angeles County Airport Land Use Commission, if applicable—ensure that any project activities within an airport land use plan or near an airport are consistent with safety guidelines and compatibility criteria.

Therefore, the project would not result in a significant safety hazard or create excessive noise for people residing or working in the project area, and impacts would be less than significant.

- f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of associated infrastructure in unincorporated Los Angeles County. While decommissioning activities may involve construction equipment and temporary work areas, these are not anticipated to interfere with established emergency response or evacuation routes.

Los Angeles County’s Operational Area Emergency Response Plan (OAERP) and the Local All-Hazards Mitigation Plan guide the County’s emergency response and recovery efforts. These plans designate specific disaster routes—shown in the County’s General Plan Safety Element—to ensure that emergency vehicles can access affected areas and that evacuations can be carried out efficiently. Any temporary lane closures or traffic control measures required during well abandonment or equipment removal would be coordinated with local agencies and conducted in compliance with County regulations, ensuring that critical routes remain passable for emergency services.

Moreover, by eliminating oil production activities, the project would reduce the potential for hazards such as spills, fires, or explosions that could complicate emergency responses. Removing these sources of risk and potentially restoring sites to safer uses aligns with the County’s hazard mitigation goals and supports long-term community resilience. The project’s Site Maintenance provisions require clearing flammable materials and debris, and the Bonds required guarantee resources for safe site closure.

Because the project’s short-term activities can be managed to avoid disrupting emergency routes, and the long-term effect of discontinuing oil production reduces hazard potential, the project would not impair or interfere with adopted emergency response or evacuation plans. Therefore, the impact is less than significant.

- g. (i) Located within a high fire hazard area with inadequate access?

**Less than Significant Impact.** Some oil production sites in unincorporated Los Angeles County are located within Very High Fire Hazard Severity Zones (VHFHSZs), where the risk of wildfire is elevated. These areas often have steep slopes, dense vegetation, and other conditions that can contribute to intense fires. However, the project, which involves phasing out oil production and decommissioning associated infrastructure, does not introduce new development or permanent uses that would increase fire risk or strain emergency access. Instead, it phases out oil production activities and ensures proper site maintenance under the project’s integrated Site Maintenance standards, which mandate the removal of combustible materials within 25 feet of wells and the clearance of debris. These standards, paired with existing Los Angeles County Fire Department regulations, help minimize the likelihood of wildfires.

Decommissioning activities would be temporary and conducted in compliance with all applicable fire safety regulations. The Los Angeles County Fire Department enforces stringent requirements for developments and projects within VHFHSZs, including maintaining adequate emergency access, ensuring sufficient fire flow, and removing flammable materials that could contribute to fire spread. The project's removal of oil-related infrastructure and hazardous materials would likely reduce the overall fire risk at the site over the long term.

While decommissioning work may involve construction equipment and temporary on-site personnel, these activities are short-term, localized, and subject to oversight by the County Fire Department. Compliance with fire codes, defensible space regulations, and any necessary vegetation management practices ensure that emergency access routes remain unobstructed and first responders can reach the site if needed. Moreover, eliminating ongoing oil production removes a source of potential fire hazard, thereby diminishing long-term fire risks.

In summary, although some project areas are located within high fire hazard zones, the project would not worsen fire risk or limit emergency access. Instead, by ceasing oil production and restoring the site, the project may improve conditions for fire safety. Therefore, impacts related to fire hazards and emergency access in high fire hazard areas would be less than significant.

(ii) Located within an area with inadequate water and pressure to meet fire flow standards?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of associated infrastructure, rather than introducing new development that demands long-term water service or enhanced fire flow capacity. While some existing oil production sites may be in areas with limited water infrastructure and reduced water pressure, the project's activities are temporary, limited to decommissioning and restoration tasks.

Fire flow standards and requirements, established by the Los Angeles County Fire Department (LACoFD), are typically determined based on the nature of ongoing land uses and the types of structures present. Active oil production operations may have previously addressed fire safety needs through on-site measures—such as storage tanks or portable water supplies—to compensate for limited municipal water systems. As the project focuses on removing wells, equipment, and associated infrastructure, the need for substantial, long-term fire flows diminishes.

During decommissioning, water use would be minimal and largely confined to activities like dust suppression and equipment cleaning. These do not strain existing water supplies or pressure. In areas lacking robust municipal infrastructure, any required fire safety measures (e.g., on-site water storage or alternative fire suppression systems) can be implemented on a temporary basis.

The project's Site Maintenance and Well Plugging and Abandonment requirements reduce the presence of flammable materials, thus diminishing potential fire-fighting needs over the long term. Additionally, by eliminating a source of flammable materials and industrial hazards in the form of oil wells and production facilities, the project reduces fire risks over the long term, thereby lessening the reliance on high fire flow capacities in the future.

In all cases, compliance with local fire codes and LACoFD guidelines ensures that any short-term needs for fire suppression resources are adequately addressed. Consequently, even in areas with limited water availability and pressure, the project would not result in significant impacts related to inadequate fire flow.

(iii) Located within proximity to land uses that have the potential for dangerous fire hazard?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of associated infrastructure and thereby reducing long-term fire risks at affected sites. While some oil operations may currently be located near land uses with potential fire hazards—such as wildlands, industrial facilities, or other areas storing flammable materials—the project’s decommissioning process is designed to minimize immediate fire risks and align with all applicable safety regulations.

During decommissioning, any flammable substances or equipment will be handled and removed according to fire safety standards set by the Los Angeles County Fire Department, the California Fire Code, and the project’s integrated the Site Maintenance standards that ensure prompt cleanup of any flammable fluids and mandatory vegetation clearance. Temporary increases in fire risk from construction equipment or handling of materials would be short-lived and mitigated through best management practices, emergency preparedness plans, and adherence to all relevant codes and regulations.

Over the long term, the cessation of oil production eliminates sources of potentially combustible materials and infrastructure that could have contributed to fire hazards. The resulting site conditions would be more compatible with surrounding land uses and less prone to fire incidents. As a result, impacts related to proximity to dangerous fire hazards would be less than significant.

h. Does the proposed use constitute a potentially dangerous fire hazard?

**Less than Significant Impact.** While the decommissioning of oil production activities may involve the use of machinery, handling of residual flammable substances, and activities that could generate heat or sparks, these operations are temporary, strictly regulated, and employ robust fire safety measures. All decommissioning activities must adhere to the applicable fire codes and standards enforced by the Los Angeles County Fire Department, including proper storage, handling, and disposal of flammable materials, the use of fire suppression equipment and emergency response protocols, and the project’s integrated Site Maintenance rules for keeping oil and debris off-site.

By phasing out oil production activities, the project eliminates a long-term source of potential fire hazards—namely, the ongoing presence of combustible materials and equipment characteristic of active oil production. Once decommissioned, the absence of active oil operations significantly reduces the likelihood of dangerous fire hazards associated with industrial operations. Any temporary risks present during the removal of infrastructure are managed and mitigated through regulatory compliance and best management practices.

As a result, while the project’s short-term activities are subject to fire safety precautions, the project does not constitute a potentially dangerous fire hazard. The long-term effect is a net reduction in fire risk compared to continued oil production operations. Thus, impacts would be less than significant.

## X. Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of associated infrastructure in unincorporated Los Angeles County. Although decommissioning work involves ground disturbance and the handling of potentially hazardous materials, compliance with existing regulatory frameworks ensures that water quality standards and waste discharge requirements are not violated, and that surface and groundwater resources are protected.

During decommissioning, residual contaminants such as hydrocarbons or drilling fluids may be encountered. However, the California Geologic Energy Management Division (CalGEM) regulates well abandonment and requires wells to be properly sealed and secured to prevent fluid migration into groundwater. Any contaminated soil or materials discovered must be treated or disposed of in accordance with state and federal laws, including the Resource Conservation and Recovery Act (RCRA) and the California Hazardous Waste Control Law, ensuring that pollutants do not migrate to water resources. In addition, the project’s Site Maintenance provisions require operators to promptly clean up and remove pools of oil or other fluids, and the Well Plugging and Abandonment standards impose a regulated closure process that further minimizes any potential for groundwater contamination.

If the project disturbs one acre or more of soil, it would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. Under this permit, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and implemented, incorporating best management practices (BMPs) such as silt fencing, wattles, or sediment basins to minimize erosion, sedimentation, and pollutant discharge into local waterways. These measures reduce the likelihood of contaminants leaving the project site and entering surface waters.

In addition, compliance with the Los Angeles County Low Impact Development Ordinance and any applicable requirements from the Regional Water Quality Control Board ensures that project activities do not degrade water quality. As the project phases out oil production, long-term risks of leaks, spills, or other contamination are reduced, ultimately benefiting regional water quality. The project’s required Bonds also guarantee that financial resources are available for site remediation should an operator fail to perform adequate cleanup.

Given these regulatory controls, mandatory compliance measures, and the new performance standards for well abandonment, the project would not violate water quality standards or waste discharge requirements, nor would it substantially degrade surface or groundwater quality. Impacts would therefore be less than significant.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

**Less than Significant Impact.** The project would phase out oil production activities and remove related infrastructure, rather than introduce new long-term uses that significantly depend on or alter groundwater supplies. Any temporary water uses during the decommissioning phase (e.g., for dust suppression or soil remediation) would be minimal and not require the development of new groundwater wells. Water, if needed, would be sourced from existing municipal or permitted supplies, thus avoiding direct withdrawals from local aquifers.

By eliminating active oil operations, the project also removes infrastructure that can impede natural infiltration, such as paved well pads and compacted access roads. Subsequent site restoration efforts—such as regrading and revegetating formerly developed areas—may enhance natural percolation of rainwater into the soil, thereby promoting groundwater recharge. This restoration can offset any minor, short-term disturbance from decommissioning and may even improve long-term groundwater conditions compared to the status quo.

Furthermore, properly plugging and abandoning oil wells, as required by the California Geologic Energy Management Division (CalGEM) standards, prevents potential vertical pathways that could contaminate or affect groundwater flows. The project's performance standards—particularly the Well Plugging and Abandonment provisions—reinforce these requirements, reducing the risk that abandoned wells could allow pollutants to enter aquifers. Removing or remediating any site contamination supports sustainable groundwater management practices.

In summary, the project does not create substantial new demands on groundwater supplies, nor does it significantly interfere with groundwater recharge. Instead, it may lead to improved infiltration and reduced contamination risks over time. Therefore, impacts related to groundwater supplies and recharge would be less than significant.

c. (i) Result in substantial erosion or siltation on- or off-site?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure, potentially involving ground-disturbing activities like grading and soil excavation during the decommissioning phase. These short-term construction activities could temporarily increase the risk of erosion or siltation, particularly if rain events occur while soils are exposed. However, such risks would be effectively managed through compliance with existing regulatory requirements and the project's integrated performance standards.

For any soil disturbance of one acre or more, the project would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which requires the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP outlines best management practices (BMPs) such as silt fencing, sediment basins, stabilized construction entrances, and other erosion-control measures to minimize soil loss and prevent sediments from entering waterways. Additionally, adherence to the Los Angeles County Low Impact Development Ordinance and grading regulations would further limit erosion and siltation both during and after construction.

In the long term, removing oil-related infrastructure and restoring the site can improve soil stability and reduce impervious surfaces, potentially enhancing natural infiltration and reducing runoff velocities. As a result, once decommissioning is complete, the site may experience reduced erosion compared to conditions present under active operations. Moreover, the project's Site Maintenance requirements ensure that operators remove debris and any potential sources of sediment promptly, decreasing the risk of erosion issues.

Given the project's compliance with existing regulatory frameworks and the implementation of BMPs, any potential erosion or siltation impacts would be short-term, controlled, and minimized. Therefore, the impact on erosion and siltation would be less than significant.

- (ii) Substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or offsite?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure, potentially involving ground-disturbing actions like grading or soil excavation during the decommissioning phase. Such activities may slightly alter on-site drainage patterns and temporarily increase surface runoff. However, these changes would be localized and short-term.

Because project activities are subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit requirements, Stormwater Pollution Prevention Plans (SWPPPs) would be prepared and implemented as required. These plans outline best management practices (BMPs) designed to control runoff, including measures to prevent water from accumulating on-site or overwhelming downstream drainage systems. Additionally, compliance with the Los Angeles County Low Impact Development Ordinance ensures that post-decommissioning conditions do not substantially increase runoff volumes or velocities.

Over the long term, the cessation of oil production and removal of impervious surfaces associated with industrial operations may improve infiltration and reduce runoff. Restoring or regrading the site and planting vegetation can enhance infiltration capacity and decrease the likelihood of on- or off-site flooding. The project's performance standards such as Site Maintenance provisions also require operators to keep areas free of debris and ensure adequate drainage, further reducing flood risks. Therefore, any short-term increase in surface runoff would be effectively managed, and the project would not cause substantial flooding. Thus, impacts related to surface runoff and flooding would be less than significant.

- (iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure, which may involve some short-term ground disturbance (e.g., grading, excavation) during decommissioning. While these activities could temporarily alter the site's runoff characteristics, compliance with applicable regulations and implementation of best management practices (BMPs) would ensure that any changes in runoff volume or quality do not exceed the capacity of existing or planned stormwater drainage systems, nor result in substantial additional sources of polluted runoff.

During decommissioning, construction-related pollutants such as sediment or hydrocarbons could potentially be carried off-site by stormwater runoff. However, if one acre or more of ground is disturbed, the project would be subject to the National Pollutant Discharge Elimination System (NPDES) Construction General Permit, requiring preparation and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP would include erosion and sediment controls, spill prevention measures, and other BMPs designed to minimize runoff impacts and prevent pollutants from entering the storm drain system. Additionally, compliance with the County's Low Impact Development Ordinance and stormwater regulations would further reduce runoff

volumes and improve runoff quality through on-site infiltration, retention, or treatment measures as appropriate.

Over the long term, removing oil wells and associated hardscape—such as pads, roads, and equipment areas—may decrease impervious surfaces and restore more natural infiltration conditions. This shift can improve on-site permeability, reduce peak runoff flows, and lower the potential pollutant load compared to ongoing oil production operations. Properly abandoning and sealing wells will eliminate potential contamination pathways, further reducing the risk of polluted runoff reaching stormwater systems. By also adhering to the project's Site Maintenance standards, operators must keep surfaces free of pooled liquids or debris that could contribute pollutants to the runoff.

Consultation with the County Public Works would ensure that any incremental runoff changes remain within the capacity of the local stormwater infrastructure. Given that the project's activities are designed to comply with regulatory standards and improve site conditions relative to existing industrial operations, the potential impacts associated with exceeding stormwater system capacity or adding significant sources of polluted runoff would be less than significant.

- (iv) Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure, none of which are intended to result in new structures that could impede or redirect flood flows. While some existing oil production sites may be located within or near Federal Emergency Management Agency (FEMA)-designated 100-year flood hazard areas or County Capital Flood floodplains, the proposed decommissioning and restoration activities are not expected to significantly alter regional flooding patterns or increase flood risk to existing housing or insurable structures.

During decommissioning, activities such as grading, soil removal, and well plugging could temporarily modify on-site drainage patterns. However, these changes would be limited in extent and duration. Any work conducted within flood-prone areas would be subject to federal, state, and local floodplain management requirements, ensuring that surface contours are not altered in a way that would substantially impede or redirect flood flows. County Public Works would review proposed activities near flood hazard areas to verify compliance with all applicable regulations, including FEMA guidelines and County floodplain ordinances. If necessary, project activities would incorporate appropriate design measures or obtain required approvals (e.g., Conditional Letter of Map Revision) to ensure flood hazards are not exacerbated.

Furthermore, removing oil production infrastructure—such as well pads, tanks, and pipelines—can restore more natural floodplain function. Eliminating these potential obstructions may improve the flow and storage capacity of floodwaters, reducing the risk that floodwaters would be redirected toward existing developments. Site restoration efforts, including regrading and revegetation, would also promote infiltration and stabilize soils, potentially enhancing natural flood management functions over the long term.

By complying with all relevant floodplain management regulations, coordinating with responsible agencies, and removing industrial infrastructure that could impede floodwaters, the project would not expose existing housing or other insurable structures to increased flood risks. Therefore, impacts

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related to impeding or redirecting flood flows within a 100-year flood hazard area or County Capital Flood floodplain would be less than significant.

- d. Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

**Less than Significant Impact.** The project would phase out and decommission existing oil production infrastructure rather than construct new permanent structures. Consequently, it would not introduce new buildings or facilities into Federal Emergency Management Agency (FEMA) 100-year flood hazard areas or County Capital Flood floodplains that would necessitate additional floodproofing measures or the purchase of flood insurance.

During the decommissioning phase, temporary equipment and staging areas may be used, but such activities are short-term and do not involve constructing permanent structures. Any work that occurs within or near flood hazard areas would comply with federal, state, and local floodplain management regulations. County Public Works and FEMA guidelines ensure that activities in these zones do not increase flood risk or require floodproofing measures beyond those already in place.

In addition, the removal of existing oil well pads, pipelines, and associated equipment from flood-prone areas can ultimately reduce flood-related risks by eliminating infrastructure that could otherwise impede flood flows or be damaged during flood events. Restoring or converting the site following decommissioning (e.g., regrading and revegetating surfaces) may enhance natural infiltration and stabilize soils, further reducing the likelihood that new flood protection measures or flood insurance requirements would arise.

Since the project does not involve placing permanent structures in flood hazard areas, no additional floodproofing or insurance mandates would be triggered. Therefore, the impact associated with placing structures in a FEMA 100-year flood hazard area or County Capital Flood floodplain is considered less than significant.

- e. Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

**Less than Significant Impact.** The project would phase out oil production activities and decommission existing infrastructure within unincorporated Los Angeles County, ultimately reducing impervious surfaces and improving on-site hydrologic conditions. Rather than introducing new impervious areas, the project involves the removal of oil well pads, paved access roads, and other industrial installations. These actions facilitate increased infiltration, reduce runoff volumes and velocities, and help restore more natural drainage patterns—measures that align with the goals of the Los Angeles County Low Impact Development (LID) Ordinance.

The LID Ordinance (Los Angeles County Code, Title 12, Chapter 12.84) aims to protect water quality, preserve natural hydrology, and minimize the impacts of stormwater runoff through strategies that retain, detain, or filter stormwater on-site. Although the ordinance typically applies to new or redevelopment projects that create additional impervious surfaces, the project does the opposite by removing industrial infrastructure and reducing impervious coverage. This results in fewer pollutant sources, improved infiltration, and reduced stormwater runoff, all of which support LID principles.

During the decommissioning phase, any temporary construction activities must comply with applicable local and state stormwater management regulations, including NPDES permits and

standard erosion and sediment control measures. Because the project's long-term effects promote, rather than hinder, natural hydrology and infiltration, it does not conflict with the LID Ordinance's requirements. Additionally, the project's integrated Site Maintenance requirements aid in keeping sites free from debris and contamination, further supporting LID objectives.

In summary, by eliminating oil production facilities and allowing sites to revert to conditions more supportive of infiltration and natural drainage, the project supports the LID Ordinance's core objectives. Consequently, the project would not conflict with, but instead complement, the LID Ordinance, resulting in a less than significant impact.

- f. Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

**No Impact.** The project would phase out oil production operations and decommission associated infrastructure but does not include the installation or use of any onsite wastewater treatment systems such as septic tanks. Since no new development or land uses requiring wastewater disposal are introduced, there is no need for a septic system or other private sewage disposal method.

Onsite wastewater treatment systems can pose risks when sited in areas with high groundwater tables, unstable geologic conditions, or near surface waters like streams, lakes, or drainage courses, as they may contaminate groundwater or surface water. However, the project does not involve any activities that would generate or manage wastewater onsite. Decommissioning efforts and site restoration work are temporary and focus on removing oil-related equipment and restoring the site to conditions more supportive of natural infiltration and reduced pollution sources. No components of the project would result in increased wastewater flows, nor require the placement of wastewater systems close to sensitive water bodies.

Because the project does not propose septic tanks or other private sewage disposal systems, it avoids the potential pitfalls associated with onsite wastewater management in geologically constrained areas or near surface water features. Consequently, no impact would occur in this regard.

- g. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

**Less than Significant Impact.** The project would phase out existing oil production operations, removing infrastructure that could otherwise release pollutants if inundated by floodwaters, a tsunami, or a seiche event. By eliminating the industrial equipment and storage facilities associated with oil production, the project effectively reduces the potential for pollutant release during any future inundation scenario.

Portions of the project area may lie within flood hazard zones designated by the Federal Emergency Management Agency (FEMA), or within areas identified as susceptible to tsunamis or seiches. However, the project does not introduce new structures or operations that would store hazardous materials or otherwise increase the risk of pollutant release during an inundation event. Instead, decommissioning activities remove existing sources of potential contamination—such as pipelines, well pads, and processing equipment—and ensure that any residual hazardous materials are properly disposed of in accordance with applicable regulations. The project's included performance standards, including Site Maintenance and Well Plugging and Abandonment, further decrease the potential for pollutants to remain on-site in the long term.

All activities conducted within or near flood hazard, tsunami, or seiche zones must comply with federal, state, and local standards, including Los Angeles County floodplain ordinances and applicable emergency management and hazard mitigation plans. Compliance with these requirements ensures that the project's decommissioning activities do not exacerbate existing flood risks or introduce new pollutant sources vulnerable to inundation.

In the long term, removing industrial infrastructure from these hazard zones may improve environmental conditions by reducing the presence of potential contaminants. Thus, the project would not significantly increase the risk of pollutant release due to inundation in flood hazard, tsunami, or seiche zones. Impacts would be less than significant.

h. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

**Less than Significant Impact.** The project would phase out oil production activities and remove related infrastructure, ultimately reducing potential pollutant sources and improving conditions for both surface and groundwater resources over time. Rather than introducing new contamination risks, the project focuses on eliminating existing industrial operations that could degrade water quality.

The project area spans the unincorporated area of Los Angeles County, which falls under the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB) and, in certain areas, the Lahontan RWQCB. Each RWQCB administers a Basin Plan with water quality objectives designed to protect beneficial uses of surface and groundwater. By removing oil wells, pipelines, and associated facilities, the project diminishes the likelihood of hydrocarbons, heavy metals, or other pollutants entering local waterways. Compliance with relevant NPDES permits, adherence to the Porter-Cologne Water Quality Control Act, and ongoing coordination with RWQCBs ensure that all decommissioning and restoration activities uphold the Basin Plan's standards for maintaining and enhancing water quality.

Los Angeles County includes several groundwater basins managed under the Sustainable Groundwater Management Act (SGMA). Sustainable groundwater management plans aim to maintain long-term groundwater quality, availability, and reliability. The project does not involve new groundwater extraction or substantial changes to groundwater recharge processes. Instead, decommissioning reduces the risk of groundwater contamination by properly plugging and abandoning oil wells in accordance with California Geologic Energy Management Division (CalGEM) regulations. This preventative measure is further supported by the project's Well Plugging and Abandonment standards, which ensure that wells are sealed and remediated, thereby aligning with SGMA goals to prevent aquifer pollution.

With the removal of industrial infrastructure, impervious surfaces may be reduced, potentially improving natural infiltration and supporting sustainable groundwater recharge over time. This shift aligns with both water quality control and groundwater management objectives, as it lessens the long-term pollution load and fosters more resilient water resources management.

In summary, by eliminating a source of industrial pollutants, adhering to all applicable regulatory requirements, and restoring sites to more natural conditions, the project neither conflicts with nor obstructs the implementation of applicable water quality control plans or sustainable groundwater

management plans. The overall effect is consistent with improving and maintaining water quality and groundwater sustainability, resulting in a less than significant impact.

## XI. Land Use/Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### a. Physically divide an established community?

**No Impact.** The project involves phasing out oil production activities, resulting in the decommissioning of existing wells and related infrastructure, rather than introducing new development features that could disrupt existing neighborhoods or separate communities. The project does not include building new roads, walls, freeways, or other substantial barriers that would impede access or circulation within established communities. Instead, it focuses on restoring or converting affected sites to conditions more consistent with surrounding land uses.

By eliminating oil production operations and associated equipment, the project may improve the visual and functional integration of these areas with their surroundings. This reduction in industrial infrastructure could enhance community cohesiveness rather than diminish it. Furthermore, the project aligns with the County’s long-term land use goals, which favor compatible and community-serving uses over industrial ones, thereby supporting local neighborhood character and connectivity.

Moreover, the project’s performance standards—including Site Maintenance and Well Plugging and Abandonment—ensure that oil-related facilities are dismantled in a manner that removes residual industrial elements and prevents lingering hazards. These requirements help blend formerly industrial sites back into the surrounding environment without creating physical obstructions. Because the project neither introduces physical barriers nor alters the existing street grid or access routes, it would not create divisions within neighborhoods or disrupt existing community patterns. As a result, no impact related to the physical division of an established community would occur.

### b. Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

**Less than Significant Impact.** The project, which phases out oil production activities and removes associated industrial infrastructure, is designed to align with the County’s land use plans, policies, and regulations adopted to avoid or mitigate environmental impacts. Rather than introducing potentially conflicting land uses, the project reduces the intensity of industrial operations and enhances compatibility with surrounding areas.

The General Plan emphasizes sustainable development, protection of environmental resources, public health, and compatibility between land uses. By decommissioning oil wells and appurtenant facilities, the project reduces potential sources of air, noise, and water pollution. This transition supports General Plan policies aimed at improving environmental quality, remediating incompatible uses, and promoting ecological restoration.

The project adheres to the County Zoning Code, including those pertaining to nonconforming uses. By designating existing oil wells as nonconforming and establishing a defined amortization period, the project facilitates phase-out of industrial operations. The project's integrated Site Maintenance standards and required Bonds further ensure that any interim operations are kept in compliance with regulations until final decommissioning, reducing potential land use conflicts. In areas with Community Standards Districts (CSDs) or other overlays—such as the Baldwin Hills CSD—the project's oil well prohibition and performance standards integrate with local requirements, safeguarding community character and mitigating environmental effects.

The project also complies with state and regional requirements enforced by entities such as the California Geologic Energy Management Division (CalGEM) and the Regional Water Quality Control Boards (RWQCBs). By removing potential pollutant sources, ensuring proper well abandonment, and preventing contamination risks, the project supports the goals of water quality control plans, air quality management strategies, and sustainable groundwater management efforts.

Because the project does not propose new development or uses that would create inconsistencies with established land use plans or environmental protection policies, it presents no conflicts. Instead, it lowers historical environmental risks and advances the County's objective of transitioning to more compatible land uses. Therefore, any potential impacts due to conflicts with County land use plans or policies are considered less than significant.

c. Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

**Less than Significant Impact.** The project, which phases out oil production activities and decommissions associated infrastructure, does not conflict with General Plan policies related to Hillside Management Areas (HMAs) or Significant Ecological Areas (SEAs). Instead, it supports the General Plan's environmental conservation objectives by removing industrial operations and restoring affected sites, thereby reducing impacts on sensitive hillside and ecological resources.

HMAs are designated to preserve natural landforms, minimize grading, protect scenic resources, and ensure environmentally sensitive hillside development. The project does not introduce new structures or extensive earthwork in hillside areas. Rather, it involves dismantling and removing oil production facilities that may currently disrupt natural slopes or views. Compliance with the County's HMA Ordinance and relevant design guidelines ensures that any temporary ground-disturbing activities during decommissioning are carefully managed. Additionally, the project's Site Maintenance provisions require operators to keep sites free of debris and combustible materials, aligning with policies that protect hillside integrity and scenic values.

SEAs are established to conserve habitat integrity, biodiversity, and ecological functions. Oil production can fragment habitats, introduce pollutants, and generate disturbances that negatively affect SEAs. By eliminating these industrial activities, the project removes pollution sources, reduces habitat disturbances, and allows for natural vegetation reestablishment. These actions directly support General Plan goals and SEA-related policies aimed at preserving sensitive habitats and

promoting ecological connectivity. The project's Well Plugging and Abandonment standards and required Bonds further ensure that decommissioning activities do not leave hazardous or obstructive remnants that could harm ecological resources.

Any short-term effects associated with dismantling equipment—such as localized soil disturbance or temporary noise—are minor, regulated, and take place within a framework of compliance with County ordinances and guidelines. Over the long term, removing oil infrastructure and restoring sites to more compatible uses fosters improved environmental conditions that are consistent with the General Plan's policies for HMAs and SEAs. Accordingly, the project does not conflict with the General Plan's goals and policies for hillside and ecological areas, and impacts are less than significant.

## XII. Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

**Potentially Significant Impact.** The project would prohibit new oil wells and phase out existing oil production operations, effectively curtailing the availability of locally-produced oil and gas—recognized mineral resources of regional and state importance. By permanently ending extraction at these sites, the project would foreclose future access to these known mineral resources, thereby resulting in their loss to the region and state.

Oil and gas have historically contributed to the local and regional economy, energy supply, and industrial base. While the project aligns with the State of California’s and the County’s policy goals to transition from fossil fuels to renewable energy sources, from a mineral resources perspective, discontinuing oil production operations represents a long-term loss of a valuable nonrenewable resource. Once these wells are plugged and abandoned, the potential to recover these materials in the future would be foregone.

Under CEQA, the permanent loss of availability of a known mineral resource is considered a significant impact. Although the project may have social, economic, and environmental benefits—such as improving public health, mitigating environmental justice concerns, and supporting climate policy objectives—this does not negate the fact that the mineral resource itself would no longer be accessible. Therefore, this aspect of the project results in a potentially significant impact related to the loss of a known mineral resource.

- b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

**Potentially Significant Impact.** The project would phase out oil production activities and prohibit new oil wells in unincorporated Los Angeles County. Many of the affected oil fields are identified in local land use documents—including the General Plan and the Baldwin Hills Community Standards District—as locally important mineral resource recovery sites. By eliminating oil production operations at these locations, the project would permanently remove the opportunity to recover these locally important mineral resources.

This loss of locally significant oil resources could have notable economic repercussions. Reduced extraction activities may diminish regional energy independence, decrease local tax revenues and

royalties, and lead to fewer employment opportunities in communities historically reliant on oil production.

The project's planned amendments to the General Plan would remove the existing designation of some oil fields as resource recovery sites, thereby solidifying the irreversible loss of locally available mineral resources. Once extraction ceases, these finite resources cannot be restored or utilized for future benefit. Although the project advances important goals such as environmental protection and land-use compatibility, the trade-off includes a permanent reduction in mineral resource availability.

Given that these sites are delineated as mineral resource recovery locations in local planning documents, and the project would effectively foreclose future resource extraction, the impact is considered potentially significant under CEQA.

### XIII. Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?

**Less than Significant Impact.** The project would phase out oil production operations, resulting in the removal of existing industrial infrastructure, which may generate temporary construction-related noise during the decommissioning process. While these activities could increase ambient noise levels, they would be short-term, localized, and subject to strict controls. By removing the existing exemption for oil wells from the County’s noise ordinance (Title 12, Chapter 12.08), all construction and decommissioning activities must comply with allowable noise levels and time-of-day restrictions, as well as the General Plan policies aimed at minimizing noise impacts on sensitive receptors.

The provisions of Los Angeles County Code, Title 12, Chapter 12.08—such as maintaining equipment in good working order, using mufflers, and limiting construction hours—ensure that any temporary increase in noise remains below regulatory thresholds and does not constitute a substantial permanent increase in ambient noise levels. Additionally, the project’s Comment and Complaint Log requirement provides a mechanism for community members to report noise issues, prompting swift responses from operators to address potential nuisances. Once decommissioning is complete, oil production-related noise sources would be removed, likely resulting in a net reduction of long-term ambient noise in the vicinity. As a result, the project would not exceed established noise standards or create a lasting noise impact, and any temporary noise increases would be less than significant.

- b. Generation of excessive groundborne vibration or groundborne noise levels?

**Less than Significant Impact.** The project involves the decommissioning and removal of oil wells and associated industrial infrastructure. Decommissioning activities—such as well plugging, equipment removal, and on-site restoration—may temporarily generate groundborne vibration and noise from heavy machinery or occasional vibratory equipment. These operations would be short-term, localized, and subject to best management practices that limit vibration levels.

The Los Angeles County Code and General Plan policies establish requirements to prevent or minimize excessive groundborne vibration, protecting both structures and sensitive receptors. By adhering to these regulations, the project ensures that any vibration from decommissioning remains below thresholds associated with building damage or undue annoyance. Moreover, the project's Site Maintenance provisions dictate the timely removal of heavy equipment once well work is finished, further reducing the duration of vibration impacts.

Once decommissioning is complete, no long-term vibration sources would remain, and the removal of oil production infrastructure would likely reduce ongoing operational noise and vibration relative to existing conditions. Consequently, the potential for the project to cause excessive groundborne vibration or noise is minimized, and impacts would be less than significant.

- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

**Less than Significant Impact.** The project would phase out oil production activities, resulting in the removal of appurtenant infrastructure in unincorporated Los Angeles County. This action does not involve adding residential units or other uses that would bring new long-term occupants into areas exposed to aircraft noise. Instead, it removes industrial operations that may currently exist in or near such areas.

If any oil production sites are located within an airport land use plan area, near a private airstrip, or within two miles of a public airport, these conditions are already established by existing land use patterns and regulations. Noise from airport operations—such as takeoffs, landings, and overflights—is regulated at the federal and state level, and the Airport Land Use Commission (ALUC) establishes compatibility guidelines to protect communities from excessive aircraft-related noise.

The project's decommissioning and restoration activities are short-term and temporary. While there may be intermittent periods of on-site work during well plugging, equipment removal, or remediation, these do not constitute permanent noise-sensitive uses (such as residential developments, schools, or hospitals) that would be adversely affected by airport-related noise. Temporary workers are not considered sensitive receptors in the same way long-term residents or employees would be, since they are present only for limited periods and are protected by occupational safety and health standards.

Furthermore, once decommissioning is complete, no new structures or uses that increase occupancy or sensitivity to noise would be introduced near airports or private airstrips. In fact, by removing industrial machinery and equipment, the project could slightly reduce the overall noise profile of the area. The project does not alter existing flight paths, airport operations, or any established noise mitigation measures in effect under airport land use plans.

In summary, the project neither introduces new permanent noise-sensitive uses into areas affected by airport-related noise nor alters conditions in a manner that would expose people to excessive

airport noise. Therefore, the potential impact related to noise exposure from airports or private airstrips remains less than significant.

## XIV. Population/Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

**Less than Significant Impact.** The project would phase out existing oil production operations, resulting in the removal of associated infrastructure, without introducing new housing, businesses, or infrastructure that could directly or indirectly induce population growth. Unlike projects that increase development capacity—such as building new residential units or extending utilities to previously undeveloped areas—this project focuses on eliminating industrial uses, rather than creating conditions conducive to unplanned growth.

The project does not expand services like water, sewer, or roads that could open new areas to development. The County’s growth forecasts and housing needs, as reflected in the General Plan and Housing Element, are met by existing designated areas and do not rely on continued oil production. In fact, by removing oil infrastructure, the project helps free land for more compatible uses identified in the General Plan’s long-term vision without encouraging unplanned or accelerated population growth.

Any workforce associated with the decommissioning activities would be temporary and sourced from existing labor pools, not resulting in a permanent increase in population or housing demand. Consequently, the project would not alter population distribution, density, or growth rates beyond what the County’s plans and projections anticipate. Thus, the project would not induce substantial unplanned population growth, and impacts would be less than significant.

- b. Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

**No Impact.** The project would phase out oil production operations and decommission existing wells on sites historically dedicated to industrial activities, not residential use. Because these sites do not contain housing units—affordable or otherwise—no one would be displaced because of the project’s implementation. The project does not involve the demolition or alteration of existing housing, nor does it require relocation of any residents.

Following decommissioning, the affected sites could be restored or converted to uses more compatible with surrounding communities, consistent with County land use policies and housing preservation goals. This transition supports broader community and environmental objectives without displacing existing residential areas.

Since the project does not remove or reduce available housing stock, including affordable housing, it does not create a need for replacement housing elsewhere. As a result, no impact would occur in relation to the displacement of existing people or housing.

## XV. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project create capacity or service level problems, or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Sheriff protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Libraries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Fire protection?

**Less than Significant Impact.** The project involves phasing out existing oil production activities and removing associated infrastructure rather than introducing new development that would increase population or fire service demand. Because the project does not create new residential, commercial, or industrial uses, it does not generate a substantial additional need for fire protection services beyond what is already provided by the Los Angeles County Fire Department (LACoFD).

In the short term, decommissioning activities require compliance with all applicable fire safety regulations, including the California Fire Code and the project’s integrated Site Maintenance provisions, which mandate clearing flammable materials and cleaning up potential ignition sources (e.g., oil spills, dry brush). By removing oil-related infrastructure, the project ultimately reduces long-term fire hazards often associated with active wells, such as the presence of combustible materials or fuel storage. The Bonds required by the project further ensure that funds are available for proper site remediation, preventing scenarios where abandoned equipment or poorly sealed wells might contribute to fire risk.

Because no new population centers or structures are introduced, and because the dismantling of hazardous facilities may reduce fire risks, there is no adverse impact on local fire service capacity or response times. Consequently, the project’s effect on fire protection remains less than significant.

b. Sheriff protection?

**Less than Significant Impact.** The project does not involve creating new residential or commercial uses that would substantially increase population or generate additional law enforcement demands. Instead, it phases out oil production and removes associated equipment, thereby eliminating industrial operations that may occasionally require sheriff intervention for trespassing, theft, or accidental spills.

During the temporary decommissioning phase, there may be a brief increase in on-site workers, but this workforce is finite and focused on specialized tasks such as well plugging and equipment

removal. This short-term presence does not lead to a permanent change in local population or ongoing calls for service. Moreover, the project's Site Maintenance provisions require operators to keep areas secure and free of hazards, thereby minimizing circumstances that could require law enforcement response.

Because it does not necessitate new or expanded sheriff facilities, any impacts on sheriff protection are less than significant.

c. Schools?

**Less than Significant Impact.** The project would phase out existing oil production activities and remove associated infrastructure and does not include any new residential development or land uses that would increase the local population. Without introducing additional households or creating conditions that attract new families to settle in the area, the project does not generate demand for new or expanded school facilities.

Decommissioning and restoration activities are temporary, involving specialized workers who typically commute from established residences rather than relocating with their families. As such, no measurable increase in student enrollment at local schools would occur. The project area would not experience any long-term population growth that could strain existing school capacity or require construction of new school facilities because of project activities.

Because the project does not contribute to population growth or generate new students, it poses no risk of exceeding current school capacities or necessitating additional educational services. Therefore, any impacts related to schools are considered less than significant.

d. Parks?

**Less than Significant Impact.** The project would phase out existing oil production activities and remove associated infrastructure, without introducing new residential or commercial development that could increase the local population. As a result, it does not generate additional demand for parkland or recreational facilities.

Unlike projects that add housing units or attract new workers and patrons, this project primarily involves decommissioning wells and restoring or converting sites to uses more compatible with surrounding communities. Because it neither contributes to population growth nor encourages new economic activity that would bring more people to the area, it does not place added pressure on local or regional park resources. The temporary workforce involved in decommissioning activities will not significantly use nearby parks, as their presence on-site is short-term and focused on the task at hand.

Once decommissioning is complete, affected sites could potentially be restored or transformed in ways that benefit surrounding communities via uses that align with the County's General Plan goals for sustainable and balanced land use. In doing so, the project may indirectly enhance community livability over time. However, the project does not require new or expanded park facilities to maintain existing service levels, nor does it diminish current recreational resources, as it does not authorize any new development.

In summary, because the project does not increase population or long-term park use, no substantial changes to park facility demands occur. Therefore, the impact on parks would be less than significant.

e. Libraries?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure and does not introduce new residential or commercial uses that would increase local population or user demand for library services. Without a corresponding rise in the number of residents, employees, or patrons, there would be no need to expand library facilities or services.

Any temporary workforce involved in the decommissioning process would be on-site for a limited duration and focused on industrial tasks, making it unlikely that they would significantly utilize nearby library resources. After the project's completion, the restored or converted sites will not create conditions that generate sustained library use. This outcome is fully consistent with County of Los Angeles Public Library planning guidelines and does not reduce existing library service ratios.

Because the project neither induces population growth nor increases long-term demands on library infrastructure, it would not require new or expanded library facilities to maintain acceptable service levels. Therefore, the impact related to libraries would be less than significant.

f. Other public facilities?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure without introducing new development that could increase demands on public facilities other than those already considered (e.g., fire, law enforcement, schools, parks, libraries). It does not add residential, commercial, or industrial uses that would generate additional users of government offices, community centers, or other local services.

During decommissioning, a temporary workforce may be present, but their needs would be minimal, short-lived, and easily accommodated by existing public facilities. Once oil operations cease and affected sites are restored or converted to uses more compatible with surrounding communities, there would be no ongoing population increase or long-term need for expanded public services or infrastructure as the project does not authorize future development of affected project sites.

Given that the project neither induces new population growth nor significantly alters existing land use intensities, it does not require the construction or expansion of other public facilities to maintain acceptable levels of service. Therefore, impacts related to other public facilities would be less than significant.

## XVI. Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Would the project interfere with regional trail connectivity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure and does not introduce new housing, commercial development, or other uses that would substantially increase the local population. Without added residents or a significant number of new workers or visitors, the project would not create additional demand for neighborhood or regional parks and other recreational facilities in the area.

While decommissioning activities may involve a temporary workforce on-site, these workers are focused on specialized industrial tasks and are unlikely to significantly use nearby parks. Any on-site presence is short-term and would not result in a noticeable increase in recreational facility usage. Once operations cease and affected sites are restored or converted to more community-compatible uses, the project may even contribute to improved environmental quality and potentially enhance local open space. However, this positive outcome would not place additional strain on existing parks.

Since the project neither draws new residents nor expands the local workforce in a way that would increase park visitation, it does not cause or accelerate physical deterioration of recreational facilities. As a result, impacts related to increased use of neighborhood or regional parks, or other recreational facilities, are considered less than significant.

- b. Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?

**Less than Significant Impact.** The project would phase out existing oil operations and restore or convert affected sites, but it does not include constructing new neighborhood or regional parks or expanding existing recreational facilities. Nor does the project create conditions that would increase

population or demand for recreational services, as it does not involve residential development or attract new, long-term users to the area.

While restoration efforts may enhance open space and potentially support future compatible land uses, this outcome does not necessitate new or expanded park facilities to serve a larger population. Since the project does not generate substantial demand for recreation services, there is no need to construct additional recreational amenities that could result in adverse environmental effects.

In summary, the project does not include or require the development or enlargement of parks or recreational facilities that could negatively impact the environment. Therefore, any impacts related to recreation facilities construction or expansion would be less than significant.

c. Would the project interfere with regional trail connectivity?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure without introducing new development that would block, reroute, or permanently alter regional trails. Oil well sites are restricted areas, not within established trail corridors, and the project does not include facilities or operations that would disrupt existing regional trail networks.

While short-term decommissioning activities may temporarily require limited access restrictions or safety measures near active work areas, any such disruptions to trail connectivity would be localized and brief. Compliance with County guidelines, including coordination with appropriate agencies if trails exist near project sites, would ensure that any temporary effects on trail access or continuity are minimized.

Following decommissioning, restored or converted sites could potentially enhance open space quality and availability. In some cases, this might indirectly benefit nearby regional trails by improving scenic values or future open space planning. Because the project does not create permanent barriers or significantly change the landscape in a way that would impede trail connectivity, any impacts related to regional trails would be less than significant.

## XVII. Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

**Less than Significant Impact.** The project would phase out oil production activities and remove related infrastructure and does not introduce new development or land uses that would alter the region’s circulation system or conflict with applicable transportation policies. Unlike projects that add homes, businesses, or large-scale facilities, this project does not generate significant new vehicle trips or demand for transit, bicycle, or pedestrian improvements.

Any transportation effects are tied to the short-term decommissioning phase, during which specialized equipment and materials would be delivered to and removed from the project sites. Although this may result in temporary increases in truck traffic, these trips would be limited in number and duration. The project’s contractors would coordinate with local agencies to ensure compliance with existing roadway standards and traffic management regulations, minimizing disruptions. Measures such as scheduling deliveries during off-peak hours and following established haul routes can further reduce any temporary impact to vehicle, transit, bicycle, or pedestrian circulation.

The project does not involve permanent infrastructure changes or long-term activities that would necessitate modifications to transit routes, bicycle facilities, or sidewalks. Once decommissioning is complete, the affected sites could be restored or converted to uses more compatible with the surrounding communities without introducing circulation conflicts. Thus, the project remains consistent with local and regional transportation plans, ordinances, and policies, including those encouraging multimodal travel.

In summary, any short-term transportation effects would be managed and minor, and the project does not create conditions that would permanently conflict with or hinder established transportation policies or programs. As a result, impacts related to the circulation system are considered less than significant.

- b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

**Less than Significant Impact.** CEQA Guidelines Section 15064.3(b) requires evaluating transportation impacts based on vehicle miles traveled (VMT) rather than traditional measures like congestion. The project, which entails decommissioning and removing oil production infrastructure, does not propose new developments that would generate long-term vehicle trips or substantially alter regional travel patterns.

Any transportation-related activities would be short-term and limited to the decommissioning phase, involving a temporary increase in trips associated with equipment and material delivery. These activities are short-lived, localized, and would not result in a permanent increase in VMT. Once the decommissioning work is complete, no ongoing VMT-generating operations remain.

By phasing out fossil fuel extraction, the project may indirectly reduce future transportation-related energy use and associated emissions over the long term. It does not create conditions that conflict with efforts to reduce VMT or hinder broader goals of State and Local CEQA Guidelines to minimize transportation-related environmental impacts.

In sum, the project neither introduces new long-term VMT sources nor conflicts with the objectives of CEQA Guidelines Section 15064.3(b). Therefore, impacts related to VMT are considered less than significant.

c. Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

**Less than Significant Impact.** The project does not involve constructing new roadways or altering existing ones in a manner that would introduce hazardous design features. It decommissions oil production operations and removes associated infrastructure, activities that occur within or adjacent to existing industrial sites already accessed by established roads designed to accommodate similar equipment and traffic.

During the temporary decommissioning period, the project may generate a limited number of trips by heavy trucks and specialized machinery. However, these vehicles would use existing roadways that currently serve industrial or similarly intensive uses. Compliance with local safety standards, permitting requirements, and traffic control measures will ensure that any short-term changes in traffic patterns are managed responsibly. This may include scheduling vehicle movements during off-peak hours and using proper signage or flaggers if necessary.

No modifications to road layouts, such as adding sharp curves or narrowing lanes, are proposed. The project also does not introduce long-term incompatible uses that would pose ongoing traffic safety concerns. Once decommissioning is complete, traffic will return to baseline levels, and no new hazards will be introduced.

As a result, the project does not substantially increase roadway hazards due to design features or incompatible uses, and any minor, short-term impacts on road use are effectively mitigated by adherence to existing traffic and safety regulations. The impact is therefore considered less than significant.

d. Result in inadequate emergency access?

**Less than Significant Impact.** The project would not introduce new structures, permanent changes to roadways, or ongoing activities that would impede emergency response routes. While

temporary decommissioning activities may generate short-term increases in truck traffic and occasional equipment movement, these effects would be carefully managed. Standard traffic control measures, coordinated with local authorities, would ensure that emergency vehicles maintain unobstructed access to and through the project area.

The project will comply with all applicable Los Angeles County fire and safety regulations, including those regarding emergency access in areas such as Very High Fire Hazard Severity Zones. Any temporary restrictions during decommissioning would be minimal, localized, and short-lived, with existing measures in place—such as scheduling deliveries during off-peak hours, using flaggers or temporary signage—to maintain emergency vehicle flow.

Once oil production activities cease and the sites are restored or converted to more compatible uses, there would be no long-term changes that compromise emergency access. In fact, removing industrial facilities may reduce certain risks associated with operational hazards. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

## XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k)?

**Less than Significant Impact.** The project would phase out oil production operations and remove associated infrastructure primarily located in previously disturbed industrial areas, where the likelihood of encountering intact tribal cultural resources is low. Under Public Resources Code §21074, tribal cultural resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that may be listed, or eligible for listing, in the California Register of Historical Resources or a local register of historical resources. Because the project does not introduce new ground-disturbing activities in previously undisturbed areas, the potential to affect such resources is minimal.

In accordance with Assembly Bill (AB) 52, the County initiated consultation with California Native American tribes that have requested notification of proposed projects in the area. This consultation process provides tribes with the opportunity to identify any known or suspected tribal cultural resources within or near the project sites. If any such resources are identified as listed or eligible for listing in the California Register or a local register, the County will work collaboratively with the tribe(s) and, if needed, a qualified archaeologist, to avoid or mitigate potential impacts. Standard treatment protocols would be implemented if tribal cultural resources are inadvertently discovered during decommissioning activities, including halting work in the immediate vicinity and consulting with tribal representatives and cultural resource professionals to determine appropriate next steps.

Given that the project sites are industrial in nature and previously disturbed, and that the County will comply with all applicable consultation and resource protection requirements, it is unlikely that tribal cultural resources would be adversely affected. Therefore, any impact to tribal cultural resources

listed or eligible for listing in the California Register of Historical Resources or a local register would be less than significant.

- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

**Less than Significant Impact.** The project would phase out oil production activities and remove associated infrastructure from previously disturbed industrial sites. These areas are generally unlikely to contain intact tribal cultural resources that hold significance to California Native American tribes. Nonetheless, the County, as the lead agency, has complied with AB 52 requirements by notifying tribes traditionally and culturally affiliated with the project area early in the CEQA process, providing them with the opportunity to identify any tribal cultural resources of concern.

If any resource is brought to the County's attention during consultation, the County will evaluate its significance under the criteria in Public Resources Code §5024.1(c). This assessment would be informed by tribal input, cultural record searches, and professional archaeological expertise. Should a resource meeting the criteria be identified, the project would incorporate measures to avoid, preserve, or mitigate impacts to that resource, in cooperation with the tribes and consistent with state and local regulatory frameworks.

Given that the project area is already disturbed and no tribal cultural resources meeting the criteria set forth in Public Resources Code §5024.1(c) have been identified thus far, the likelihood of encountering a significant tribal cultural resource is low. In the unlikely event that previously unknown resources are discovered during decommissioning, work in the vicinity would cease until appropriate evaluation and treatment measures are implemented. As a result, potential impacts to tribal cultural resources under this category are anticipated to be less than significant.

## XIX. Utilities/Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

**Less than Significant Impact.** The project would phase out oil production operations and remove associated infrastructure on previously disturbed industrial sites. It would not introduce new development, housing, businesses, or other uses that increase long-term demands on public utilities and service systems. As a result, it is not expected to require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunication facilities that could lead to significant environmental impacts.

The project involves temporary decommissioning activities and does not introduce a new water demand or substantial wastewater generation. Any minimal water use during decommissioning would be short-term and easily accommodated by existing supplies and facilities. Compliance with the project's Site Maintenance requirements and Well Plugging and Abandonment standards ensures that vacated facilities do not become sources of ongoing utility burdens. No new sewer connections or expansions are needed because the project does not generate long-term wastewater discharges that would exceed current system capacities.

The project sites are already developed with industrial infrastructure. Decommissioning and restoration activities may improve natural infiltration or encourage more compatible future land uses that reduce reliance on engineered drainage systems. The project does not involve adding large areas of impervious surfaces or altering stormwater flow to such an extent that it would necessitate new or expanded stormwater drainage facilities. Compliance with the County’s Low Impact Development (LID) standards ensures that potential changes in runoff are managed sustainably and within existing system capabilities.

Temporary electrical and other utility demands during decommissioning are minimal and can be met by existing infrastructure. No long-term operational changes would occur that increase demand for energy or communication services. Consequently, no new or upgraded utility infrastructure is needed beyond what is already in place.

Considering that the project does not increase permanent population, alter land uses to more intensive activities, or require substantial new infrastructure, impacts related to utilities and service systems are less than significant.

- b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

**Less than Significant Impact.** The project would not introduce new residents, businesses, or long-term operations that significantly increase water demand. Instead, it involves the temporary use of minimal water supplies to support decommissioning activities, such as dust control and equipment cleaning, followed by site restoration or conversion to more compatible uses. Once oil production ceases, there is no ongoing need for substantial water consumption.

Any short-term water needs can be met by existing water sources and infrastructure, as these demands are neither continuous nor large enough to strain local supplies. The project does not meet thresholds that would trigger the preparation of a water supply assessment under Senate Bill (SB) 610 or SB 221, nor does it require new entitlements. It also does not alter regional water supply plans or compromise water availability during normal, dry, or multiple dry years.

Compliance with County and state water conservation measures and water quality standards ensures that any temporary water use will be managed responsibly. By requiring operators to meet Bonds obligations and fulfilling Well Plugging and Abandonment standards, the project ensures that old infrastructure is removed and sites do not demand future water resources. Because the project does not significantly increase water demand, impacts related to having sufficient water supplies for the project and reasonably foreseeable future development are less than significant.

- c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

**Less than Significant Impact.** The project requires the decommissioning and removal of oil wells and associated infrastructure, which are not activities that would generate a substantial volume of wastewater. Any wastewater produced during decommissioning—such as from equipment cleaning or temporary sanitation facilities for workers—would be minimal, short-term, and easily accommodated by existing wastewater treatment infrastructure.

Once decommissioning is complete, the project does not introduce new land uses or operations that would produce ongoing wastewater flows. In fact, the cessation of oil production may reduce any previous wastewater loads associated with those activities, freeing up capacity in the long term. Because the project's limited and temporary wastewater demands do not approach the capacity limits of the existing service providers, no expansions or new wastewater treatment facilities would be required. The project's Site Maintenance and Well Plugging and Abandonment provisions help ensure that contaminants are properly contained, preventing any unexpected load on wastewater systems.

As a result, the project would not hinder a wastewater treatment provider's ability to serve its existing commitments or require adjustments to their operational capacity. Thus, the impact on wastewater treatment capacity would be less than significant.

- d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

**Less than Significant Impact.** The project would decommission and remove oil wells and associated infrastructure, generating a temporary increase in construction and demolition debris rather than ongoing solid waste. Any waste produced during these decommissioning activities—such as piping, equipment, and concrete—would be managed in accordance with applicable State and local regulations, including those focused on waste diversion, recycling, and proper disposal.

California's solid waste regulations (e.g., AB 939) and the County's Integrated Waste Management Plan guide the proper handling and reduction of solid waste. A substantial portion of construction and demolition debris can often be recycled or reused, minimizing the amount sent to landfills. Existing regional landfill facilities have sufficient remaining capacity, as confirmed by regular assessments in the Integrated Waste Management Plan, to accommodate the temporary volume of materials generated by the project. Moreover, no new long-term waste streams would be created, and once decommissioning is complete, the project would not generate operational waste.

Compliance with established waste management standards ensures that the project's short-term increase in solid waste would not exceed State or local thresholds or hinder solid waste reduction goals. Adhering to the project's Site Maintenance provisions also ensures prompt removal of debris to avoid any accumulation or environmental hazards. As a result, impacts related to solid waste capacity and standards would be less than significant.

- e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

**Less than Significant Impact.** The project would generate a limited amount of solid waste as part of the temporary oil well decommissioning process, including dismantled infrastructure and construction and demolition debris. All handling, storage, transportation, and disposal of this waste would occur in accordance with federal, state, and local statutes and regulations related to solid waste management and reduction.

All project activities must comply with the California Integrated Waste Management Act (AB 939), which mandates recycling and waste diversion, as well as local ordinances requiring construction and demolition waste diversion. This includes adherence to the County's Source Reduction and Recycling Element and compliance with regional and state-mandated diversion targets. Additionally, the project must follow the County's Construction and Demolition Debris Recycling Ordinance,

ensuring that a significant portion of generated debris is recycled or reused rather than disposed of in landfills.

Facilities receiving solid waste from the project would be properly permitted and operated in accordance with the Integrated Waste Management Plan and other relevant guidelines, ensuring adequate disposal capacity. Since the project does not create new sources of ongoing waste but merely addresses temporary demolition waste, it will not impair the County's ability to meet solid waste reduction goals. Under the project's Site Maintenance requirements, operators are responsible for removing demolition debris and potential contaminants in a timely, regulated manner. Licensed waste haulers and permitted disposal facilities ensure compliance with relevant codes, while performance standards in Bonds guarantee financial resources for any necessary remediation or proper waste handling. Furthermore, no permanent increase in solid waste generation will occur once the decommissioning is complete.

By adhering to all applicable solid waste regulations and policies, the project will ensure that any waste generated is managed responsibly and sustainably. As a result, the project's impact related to compliance with solid waste management and reduction statutes is considered less than significant.

## XX. Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

**Less than Significant Impact.** The project requires the phasing out of oil production activities, resulting in the removal of existing appurtenant infrastructure. Project activities are expected to occur within existing industrial sites and rights-of-way, without introducing new permanent land uses or significant physical changes that could obstruct or interfere with emergency response routes or evacuation procedures.

Los Angeles County maintains emergency response and evacuation plans, such as the Operational Area Emergency Response Plan and the All-Hazards Mitigation Plan, which designate emergency routes and procedures. These plans are designed to ensure adequate public safety and effective disaster response across the County, including areas where oil wells are located.

During decommissioning activities, temporary increases in vehicle traffic and equipment staging may occur near project sites. However, these effects will be localized and short-term, and project activities will be required to coordinate with local agencies, such as the County Department of Public Works and Office of Emergency Management, to ensure compliance with emergency access requirements. Such coordination includes maintaining clear access to designated emergency routes and complying with traffic control measures to minimize disruptions.

Additionally, the project does not propose any alterations to critical infrastructure or public rights-of-way that would permanently impair emergency response capabilities. Compliance with existing regulatory frameworks, including building and safety codes, further reduces the potential for significant impacts. By removing industrial hazards and following the project’s Site Maintenance

standards—such as clearing debris and combustible materials—the project may actually enhance overall safety.

Given the temporary and manageable nature of potential disruptions and the regulatory oversight in place, the project is not expected to substantially impair any adopted emergency response or evacuation plan. Therefore, the impact is considered less than significant.

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

**Less than Significant Impact.** The project would phase out oil operations and remove associated infrastructure within areas already designated and managed for industrial use. Some project sites lie within or near Very High Fire Hazard Severity Zones (VHFHSZs), where factors such as slope and prevailing winds can contribute to wildfire risks. However, the project would not introduce new permanent development or occupants who could be exposed to wildfire-related hazards. Instead, it focuses on removing oil production infrastructure and restoring or converting disturbed areas to uses more compatible with surrounding communities.

Temporary decommissioning activities might involve equipment that could ignite sparks or generate heat. Compliance with applicable fire prevention and safety requirements—including coordination with the Los Angeles County Fire Department, adherence to the California Fire Code, and implementing best management practices such as spark prevention, regular equipment maintenance, and on-site fire suppression—will minimize fire risks during this short-term phase.

Once oil production equipment is removed, potential ignition sources decrease, potentially reducing long-term fire risks. Without the introduction of residents or employees to areas of elevated wildfire risk, there is no added population at risk of exposure to wildfire smoke or pollutant concentrations. While the site's natural conditions and climate factors remain unchanged, the project neither increases vulnerability to wildfires nor places people in harm's way.

In summary, due to strict compliance with fire safety measures, no permanent occupancy, and the elimination of industrial hazards, the project would not exacerbate wildfire risks or expose occupants to significant pollutant concentrations from a wildfire. Therefore, the impact is considered less than significant.

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

**Less than Significant Impact.** The project requires phasing out of oil production activities, which results in the removal of industrial infrastructure. The project would not create new infrastructure or facilities that could elevate fire risk or cause ongoing environmental impacts. Instead, it focuses on decommissioning and removing existing oil production equipment, with all work occurring within or adjacent to areas already served by established roads, utilities, and industrial access points.

No new roads, fuel breaks, emergency water sources, or additional power lines are needed to implement the project. Temporary modifications may occur during the decommissioning phase, such as using existing roads for equipment transport or making minor adjustments to existing utilities. However, these activities will be short-term and conducted in compliance with applicable fire

safety regulations (e.g., California Fire Code requirements) and environmental standards. All project activities must follow best management practices—such as controlling spark sources, maintaining defensible space, and ensuring the availability of fire suppression tools—to prevent increasing wildfire risk.

By eliminating oil production infrastructure, the project may reduce long-term fire hazards by removing potential ignition sources. No ongoing maintenance of new infrastructure is required, minimizing the potential for habitat disturbance or other environmental impacts.

The project does not involve the installation or maintenance of additional infrastructure that could exacerbate wildfire risk. Any temporary impacts during decommissioning are managed through adherence to existing safety and environmental protocols, ensuring that the overall impact remains less than significant.

- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

**Less than Significant Impact.** The project would phase out oil production operations and remove associated industrial infrastructure on previously disturbed sites, rather than introducing new development or major land alterations. Consequently, it does not create conditions that would increase the likelihood of downslope or downstream hazards, including flooding or landslides, resulting from altered drainage or post-fire slope instability.

While decommissioning activities involve some ground disturbance, these are short-term and localized. Compliance with County grading and erosion control regulations, as well as adherence to stormwater management requirements, ensures that any disturbed areas are stabilized promptly. Restoration or conversion of the sites to more compatible land uses will improve soil stability and infiltration capacity, thereby reducing the potential for post-project runoff or slope destabilization.

Because the project does not create large expanses of impervious surfaces or modify slopes in ways that could exacerbate post-fire instability or alter natural drainage patterns, the risk of inducing new flood or landslide hazards is minimal. If any site work occurs near potentially sensitive slopes, geotechnical evaluations and corresponding mitigation measures would be applied, further reducing the risk of adverse effects.

In summary, by following existing regulatory standards and best management practices, the project will not expose people or structures to significant risks from runoff, post-fire slope instability, or drainage changes. Therefore, impacts are considered less than significant.

## XXI. Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

**Less than Significant Impact.** The project phases out oil production activities and removes associated industrial infrastructure from sites that are largely previously disturbed. Although decommissioning may involve short-term ground-disturbing activities, these occur under stringent regulatory frameworks and established best management practices (BMPs) that safeguard sensitive biological and cultural resources. Compliance with laws and regulations, such as the California Endangered Species Act, the Migratory Bird Treaty Act, and the County’s Significant Ecological Area (SEA) protections, ensures that fish, wildlife, and plant communities are not substantially harmed. If any tribal cultural or archaeological materials are encountered, work would cease, and appropriate consultation and treatment measures would be implemented to prevent significant impacts to cultural resources.

Over the long term, ceasing oil production and removing infrastructure would likely improve local environmental conditions, reduce pollution sources, and allow for habitat recovery or more compatible land uses. Therefore, the project does not substantially degrade environmental quality or threaten ecological or cultural integrity. Any potential impacts are considered less than significant.

- b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

**Less than Significant Impact.** The project does not introduce new development or activities that would notably increase population, traffic, or pollution. Instead, it phases out an existing source of environmental impacts—oil production—resulting in the removal of industrial infrastructure and associated emissions, hazards, and disturbance. This action aligns with broader regional and state goals to reduce fossil fuel reliance, improve air quality, and protect habitats, thus making an incremental positive contribution to cumulative environmental conditions.

While short-term decommissioning activities may generate minor increases in noise, dust, and localized emissions, these are temporary, controlled by BMPs and regulations, and do not significantly contribute to cumulative adverse conditions. Viewed alongside other past, current, and future projects aimed at environmental improvement and sustainable resource use, the project's incremental effects are beneficial rather than cumulatively considerable. Thus, the project's contribution to cumulative impacts is less than significant.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

**Less than Significant Impact.** By eliminating oil production operations and associated hazards, the project is expected to improve local environmental quality over time, thereby reducing potential health risks to surrounding communities. Short-term construction-related effects—such as noise, dust, and limited equipment traffic—are temporary, subject to compliance with local ordinances, and minimized through standard control measures. There are no permanent increases in activities that would adversely affect public health, such as introducing new sources of pollution or hazards.

In the long term, the absence of operational oil wells and infrastructure reduces exposure to industrial contaminants, vibrations, and noise. This outcome supports better public health outcomes and environmental justice goals. Consequently, any direct or indirect effects on human beings are short-lived, well-managed, and less than significant.



# Figure 2

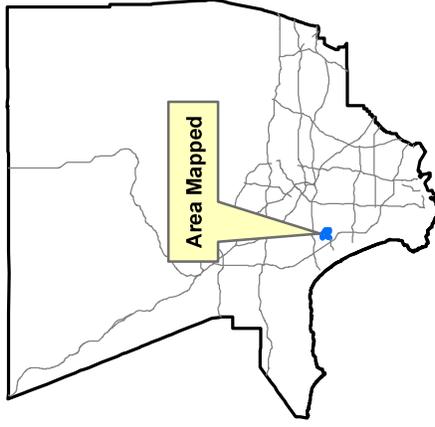
COUNTY OF LOS ANGELES

**Baldwin Hills  
Community Standards District**

### LEGEND:

-  Community Standards District
-  Area Specific Standards
-  City / Unincorporated

### Key Map:



Los Angeles County  
Dept. of Regional Planning  
320 W. Temple St.  
Los Angeles, CA 90012

