

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: E & B Natural Resources Management Corporation, Hillcrest Beverly Oil Corporation (cont'd below)

Company/Organization: (cont'd) E&B ENR I, LLC, and Elysium Natural Resources, LLC

Mailing Address: 1608 Norris Road

City: Bakersfield State: CA Zip Code: 93308

Telephone: 213-576-1185 E-mail: matt.wickersham@alston.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): Matthew Wickersham

Company: Alston & Bird LLP

Mailing Address: 350 S. Grand Avenue, 51st Floor

City: Los Angeles State: CA Zip Code: 90071

Telephone: 213-576-1185 E-mail: matt.wickersham@alston.com

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.

ALSTON & BIRD

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Matthew Wickersham

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**VIA Online Application System
(<https://planning.lacity.org/oas>)**

November 10, 2025

Los Angeles City Council
200 North Spring Street, Room 701
Los Angeles, CA 90012

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

Dear Councilmembers,

We represent E & B Natural Resources Management Corporation, Hillcrest Beverly Oil Corporation, E&B ENR I, LLC, and Elysium Natural Resources, LLC (collectively, "E&B") and submit this justification in support of E&B's CEQA Appeal of the City of Los Angeles Department of City Planning's ("City Planning") "Zoning Administrator's Interpretation" ("ZAI" or "2025 ZAI"), issued on June 12, 2025.¹ E&B previously submitted an appeal of the ZAI to the City Planning Commission, which was denied on October 9, 2025, as reflected in the Letter of Determination served on November 10, 2025. (Attachment 5.)

A. Background Regarding the 2025 ZAI.

The City's Municipal Code states that operators must file an application with the Department of City Planning prior to drilling, deepening or maintaining an oil well. (Los Angeles Municipal Code ("LAMC") § 13.01, subd. (H) and (I).) For decades after adoption of these code provisions in 1955, the Los Angeles Planning Department had recognized that the ongoing maintenance of existing wells is governed by the operative plan approvals that approved the initial drilling and re-drilling of wells within controlled drillsites within the City. These plan approvals set forth extensive conditions providing for how wells may be operated and maintained, and so the Department's prior approval authorizing the drilling or re-drilling of wells includes the ability to conduct the operations

¹ By this letter, E&B incorporates its prior submissions to the City Planning Commission regarding its appeal of the 2025 ZAI. For purposes of any subsequent litigation, this appeal is also deemed to include the administrative record in the prior oil and gas ordinance litigation as discussed in the March 3, 2025, stipulation for entry of judgment and writ.

needed to maintain these wells. In fact, the initial Plan Approval establishing the use of the San Vicente site as a controlled drill site, specifically authorized the operator to drill up to eight wells “and to maintain such equipment and accessories as they are necessary in the drilling for, and the production of oils, gas and other hydrocarbon substances upon the ... terms and conditions” that were set forth in the document. (Attachment 1 at p. 1.)

Recently, City Planning began to state occasionally to operators that a separate discretionary review was required for maintenance operations. This new position first began around the time that City Planning staff began to work toward the adoption of an ordinance prohibiting the continued operation of oil production operations within the City. For instance, on December 27, 2020, the Energy, Climate Change, and Environmental Justice Committee voted to recommend that City Planning work with the City Attorney in drafting an ordinance to prohibit oil and gas extraction and make extraction activities a non-conforming use in all zones. The resulting ordinance was subsequently adopted on December 2, 2022 by the City Council, and effective on January 18, 2023 (“2023 Ordinance”).

On January 17, 2023, a Zoning Administrator’s Interpretation (Case No. ZA-2022-8997-ZAI-1A) was issued interpreting the meaning of “well maintenance” in the LAMC, including in the 2023 Ordinance prohibiting the use of drilling, re-drilling and maintenance of wells. The 2023 ZAI provided that maintenance shall include activities triggering a “Rework Permit” from the California Geologic Energy Management Division and/or notification per South Coast Air Quality Management District Rule 1148.2 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.

After litigation was filed by E&B and others challenging the 2023 Ordinance and the 2023 ZAI, the Los Angeles Superior Court held that the 2023 Ordinance and 2023 ZAI was preempted by state law as they seek to bar or regulate the oil production methods by which oil and gas can be extracted within the City. In a judgment issued on March 21, 2025, the City was enjoined from enforcing the 2023 ZAI.² The 2023 ZAI was rescinded by the Office of Zoning Administration on May 29, 2025. Two weeks later, the Zoning Administrator issued the 2025 ZAI, which is substantively identical to the rescinded and invalidated 2023 ZAI.

In adopting the 2025 ZAI, the Zoning Administrator stated that the 2025 ZAI is not a “project” as that term is defined by CEQA Guidelines, Section 15378 as it constitutes an administrative and procedure-making activity to assist in the implementation of the City’s preexisting Zoning Code provisions regarding oil well sites. Even assuming that the ZAI

² *Warren E&P, Inc. v. City of Los Angeles*, Los Angeles Superior Court, No. 23STCP00060, and related cases.

is considered a project, the Zoning Administrator stated that the 2025 ZAI is nevertheless exempt under the Class 8 and common-sense exemptions.

Following adoption of the ZAI, E&B filed an appeal of the 2025 ZAI to the City Planning Commissioner. On October 7, 2025, the City Planning Commission voted to deny the appeal, and a Letter of Determination was issued on November 10, 2025. (Attachment 5.)

B. The City Council Must Consider this CEQA Appeal of the 2025 ZAI.

E&B submits this CEQA appeal of the 2025 ZAI pursuant to Section 13B.11.1 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.” (*Id.*, § 13B.11.1.F.2.d.)³ All other project approval appeals have been previously exhausted. (*Id.*, § 13B.11.1.F.3.) The decisionmaker was not the City Council. (*Id.*, § 13B.11.1.F.2.)

E&B is also an interested party as required under section 13B.11.1.F.2. E&B currently conducts oil and gas operations at several locations within the City of Los Angeles. For example, E&B operates a facility located in the vicinity of San Vicente Boulevard and West Third Street (“San Vicente facility”) and at Pico Boulevard and Genesee Avenue (“Packard facility”) in the City. The San Vicente and Packard facilities collectively extract from 1,297 acres of mineral interests. Additionally, the Murphy facility is located in the vicinity of West Adams Boulevard and Western Avenue, and it extracts from 960 acres of mineral interests. E&B also conducts oil and gas operations at the Hillcrest Country Club facility, located in the vicinity of West Pico Boulevard and Avenue of the Stars, and at the Rancho Park Golf Club facility, located in the vicinity of West Pico Boulevard and Beverly Glen Boulevard. These two facilities collectively extract from 617 acres of mineral interests. E&B conducts oil production operations within the City in the South Torrance oilfield in the vicinity of East Pacific Coast Highway and Wilmington Boulevard and extracting from 330 acres of mineral interests. E&B also conducts oil production operations within the City in the Wilmington oilfield in the vicinity of W. Sepulveda Boulevard and S. Main Street and extracting from 146 acres of mineral interests. As part of these operations, E&B owns the mineral rights directly in fee or leases the mineral rights from royalty owners. As it stands, E&B’s vested rights and ability to continue operations are jeopardized by the proposed application of the 2025 ZAI.

E&B requests the City Council take the necessary, additional steps to study the environmental impact of this project, complete the required environmental review under

³ The accompanying form incorrectly states that a CEQA appeal is not available for determinations that an approval is not a project under CEQA. Regardless, the Zoning Administrator also stated that the 2025 ZAI was categorically exempt from CEQA.

the California Environmental Quality Act ("CEQA"), and reconsider the 2025 ZAI as it is currently drafted.

C. Treating the 2025 ZAI as a Separate Project is Improper Piecemealing under CEQA.

CEQA applies whenever a government agency approves a discretionary project, defined as "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.) CEQA defines "project" as the "whole of an action" and prohibits segmentation of project activities in an effort to minimize the evaluation of environmental effects. (Cal. Code Regs., tit. 14, § 15378.) "Accordingly, CEQA forbids piecemeal review of the significant environmental impacts of a project." (*Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222 (internal citations omitted).) "Agencies cannot allow environmental considerations to become submerged by chopping a large project into many little ones." (*Id.*)

In its adoption of the substantially similar ZAI in January 2023, the Zoning Administrator stated that the 2023 ZAI "constitutes an administrative activity to assist in the implementation of the Oil and Gas Drilling Ordinance (Ordinance No. 187,709) adopted by the City Council on December 2, 2022 and which becomes effective on January 18, 2023." (1/17/23 ZAI, ZA-2022-8997-ZAI.) This Ordinance prohibited the use of well maintenance subject to narrow exceptions. While the 2023 Ordinance was also invalidated by the Superior Court and repealed by the City Council, the City has expressed an intent to re-adopt this Ordinance.

As the current ZAI is substantively identical to the 2023 ZAI, the CEQA review for the 2025 ZAI must take into account the whole of the action. CEQA requires that "environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment—which cumulatively may have disastrous consequences." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396 [holding that CEQA review must consider the reasonably foreseeable future expansion of the project].)

The City must consider the potential environmental impacts of both the 2025 ZAI and the proposed oil and gas ordinance now, as the two actions comprise the "whole of the project." The issuance of the 2025 ZAI is a necessary precursor to the City's adoption of this definition in its proposed oil and gas ordinance. "Under CEQA, the agency must consider the cumulative environmental effects of its action before a project gains irreversible momentum." (*City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1333; see also *City of Carmel-by-the-Sea v. Board of Supervisors* (1986) 183 Cal.App.3d 229, 249-25 ["the difficulty of assessing future impacts of a zoning ordinance does not excuse preparation of an EIR; such difficulty only reduces the level of specificity required and shifts the focus to the secondary effects"].)

Here, City Planning has publicly stated an intent to put forward an ordinance that prohibits well maintenance, which will be defined by the 2025 ZAI's new definition. The draft ordinance is posted on City Planning's website.⁴ The draft ordinance has been subject to a stakeholder meeting already. The draft ordinance also includes an identical definition of maintenance as used in the 2025 ZAI. City Planning says that any connection between the draft ordinance and the 2025 ZAI is somehow speculation and hypothetical. (Staff Report at p. 20.)

The courts will not be so gullible. There is a long history of courts finding that the "division of the project into two parts with 'mutually exclusive' environmental documents [was] 'inconsistent with the mandate of CEQA' and constituted an abuse of discretion." *City of Antioch v. City Council* (1986) 187 Cal.App.3d 1325, 1333-1336, citing cases.) As in these cases, the City's drilling prohibition is simply "the first domino to fall in a causally related series of events to follow." (*Paulek v. Dep't of Water Res.* (2014) 231 Cal.App.4th 35, 46.)

As such, the Zoning Administrator must consider the potential environmental impacts of its revised oil well ordinance at the time that the Zoning Administrator issued the 2025 ZAI. The foreseeable adoption of an ordinance prohibiting well maintenance will result in substantial environmental impacts. Further, CEQA review is needed to analyze the potentially significant environmental effects (both direct and cumulative) to air quality, energy, aesthetics, traffic, odor, and noise as a result of the accelerated rate of abandonment activities, and the increased importation of oil to replace the decreased local production. CEQA review is also needed to consider the growth-inducing changes resulting from the City's proposed actions to discourage and force the termination of existing oil production operations.

D. Petroleum is Considered a Mineral Resource under CEQA and the City's General Plan.

In its Staff Report to the City Planning Commissioner, City Planning staff argued surprisingly that oil and gas does not constitute a mineral resource, pointing to a statute that excludes petroleum from the statutory provisions defining the scope of regulation of mining activities under the Department of Conservation. (See Staff Report at p. 19.)

This argument ignores the many statutory and regulatory provisions that broadly define mineral resources to include oil and gas. (See, e.g., Gov't Code § 66451.11 ["'mineral resource extraction' means gas, oil, hydrocarbon, gravel, or sand extraction, geothermal wells, or other similar commercial mining activity"]; Pub. Res. Code § 6407 ["Mineral deposits reserved to the state shall include all mineral deposits in lands belonging to, or which may become, the property of the state, including but not limited to, oil and gas..."]; Ca. Water Code § 8677 [titled "reservation of mineral deposits" and including

⁴ Los Angeles Department of City Planning, *Oil and Gas Drilling Ordinance*, available at <https://planning.lacity.gov/plans-policies/oil-and-gas-drilling-ordinance>.

“[a]ll oil, gas, oil shale, coal, phosphate, sodium, gold, silver, and all other mineral deposits in the land”]; Cal. Code Regs. Tit. 18, § 468 [discussing “market value of an oil and gas mineral property interest”].)

This argument also ignores that the Conservation Element of the City's General Plan states that petroleum is a non-renewable resource and so impacts to this resource must be evaluated under CEQA:

Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted... CEQA requires that impacts on non-renewable mineral resources be evaluated relative to proposed development projects... Petroleum is a non-renewable resource

(Attachment 2 [Conservation Element at II-57, 58, 63].)

In fact, City Planning has regularly analyzed the potential impacts to oil and gas resources in considering impacts to “mineral resources” in various environmental impact reports. (See Attachment 3.) The County of Los Angeles has also recently issued a Notice of Preparation for an Environmental Impact Report due to the impacts to mineral resources caused by its proposed adoption of an ordinance making oil and gas production a nonconforming use. (Attachment 4 [NOP].)

E. The 2025 ZAI Is a Project under CEQA.

The Zoning Administrator incorrectly states that the 2025 ZAI is not a “project” subject to CEQA and is exempt under CEQA Guidelines Section 15378 as an “administrative and procedure-making activity.” The promulgation of the ZAI does not appropriately fall under any of the exceptions to the definition of “project” under CEQA. (See Cal. Code Regs., tit. 14, § 15378.) Section 15378(b)(2) relates to “continuing” administrative activities and is described as applying to such things as “purchases of supplies,” and “personnel-related actions.” Section 15378(b)(5) is described as applying to “organization or administrative activities that will not result in a direct or indirect physical change to the environment.” Clearly, these sections do not apply to the 2025 ZAI's restrictions on maintenance activity.

The 2025 ZAI changes the City's long-standing interpretation of language in the Municipal Code and fundamentally impacts the ability of E&B to maintain and operate existing wells, which are permitted by the City, regulated by a number of state agencies, and for which E&B possesses a vested right. The 2025 ZAI also improperly rescinds E&B of permit conditions allowing E&B to conduct maintenance operations without further discretionary review. As reflected in the California Court of Appeal's evaluation of ZA Memo 133, the Planning Department cannot take any action to modify previously approved conditions without complying with the requirements for a nuisance abatement proceeding under LAMC section 12.27.1:

In other words, the authority that Memorandum 133 explicitly confers upon the City with respect to modifications of previously approved conditions is authority that has existed all along. Nothing in Memorandum 133 indicates that the notice and hearing protections set forth in City Code section 12.27.1 would not apply before the City decided to modify, discontinue, or revoke a previously approved condition in an existing permit.

(*Youth for Env'tl. Justice v. City of L.A.*, No. B282822, 2019 Cal. App. Unpub. LEXIS 1110, at *42 (Feb. 15, 2019) (“*YEJ v. City of LA*”).⁵ Despite this finding, the 2025 ZAI drastically expands the scope of activities that require discretionary review even though the City has made no attempt to show that the oil operations impacted by the 2025 ZAI constitute a nuisance within the meaning of section 12.27.1. As such, the City cannot claim that the 2025 ZAI simply formalizes an existing interpretation when the 2025 ZAI will modify existing permitted operations.⁶

These impacts are magnified when considered in conjunction with the adoption of the City's proposed oil and gas ordinance that must be evaluated under CEQA at this stage by the City as a reasonably foreseeable consequence of the 2025 ZAI. As discussed above, the definition of “maintenance” within the 2025 ZAI is already incorporated into the proposed oil and gas ordinance prohibiting these maintenance operations. The City cannot avoid CEQA review of the impact of this expanded definition simply by not explicitly mentioning the 2025 ZAI in its proposed ordinance.

F. The 2025 ZAI Is Not Subject to a Class 8 Exemption under CEQA.

The Zoning Administrator also relies upon the Class 8 exemption for actions by regulatory agencies for the protection of the environment. The Class 8 exemption only applies to “actions taken by regulatory agencies, as authorized by state or local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment where the regulatory process involves procedures for protection of the environment.” (Cal. Code Regs., tit. 14, § 15308, emphasis added.) The Zoning Administrator is not a regulatory agency. Further, the 2025 ZAI is part of a legislative enactment, and not an act by a regulatory agency. Further, the Class 8 exemption does not apply to actions that improve one element of the environment but have significant effects on another. (*Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal.App.4th 644.) The Zoning Administrator cannot simply “circumvent CEQA merely by characterizing its ordinance[] as environmentally friendly and therefore exempt” under a Class 8 exemption.

⁵ While the *YEJ v. City of LA* opinion is not a published opinion, it remains binding upon the City under the principles of collateral estoppel. (*Parklane Hosiery Company, Inc. v. Shore* (1979) 439 U.S. 322, 332-333.)

⁶ Despite its lengthy analysis, the CPC Staff Report could not identify any instance prior to the adoption of the 2023 ZAI where City Planning had insinuated that “maintenance” included any activity subject to notification requirements under SCAQMD Rule 1148.2.

(*Save the Plastic Bag Coalition v. County of Marin* (2013) 218 Cal.App.4th 209, 219-220.) The 2025 ZAI has the potential for significant, adverse impacts, including to mineral resources, air quality, and GHG.

Even standing alone, the expanded definition of well maintenance in the 2025 ZAI will make it significantly more difficult for operators to conduct routine well maintenance that is essential for the continued operation of the existing oil wells, particularly injection wells. The adoption of the 2025 ZAI will undoubtedly impact the availability of mineral resources in the City and the State since the stated goal of the City is to stop oil production within the City limits. "Mineral resources" are an environmental factor pursuant to CEQA, and the "loss of availability of a known mineral resource that would be a value to the region and the residents of the state" or the "loss of availability of a locally important mineral resource recovery site" constitutes an adverse environmental impact. (Cal. Code Regs., tit. 14, Appendix G, § XII(a), (b); Public Resources Code § 21060.5.)

G. The 2025 ZAI Is Not Subject to the Common-Sense Exemption under CEQA.

The ZAI is not subject to the "common-sense exemption" under section 15061(b)(2)-(3) of the CEQA Guidelines. This exemption applies "[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." (Cal. Code Regs., tit. 14, § 15061(b)(3).) As the ZAI will make it more difficult for operators to maintain their wells within the City, the ZAI will reduce the ability to conduct local oil production within the City. This impact will have a material effect on the availability of mineral resources within the City and, consequently, GHG emissions due to the increased demand for foreign oil and the transport of foreign oil to the City. And importantly, CEQA recognizes that limitations in the access of mineral resources create a significant environmental impact. (*See* Cal. Code Regs., tit. 14, Appendix G, section XII(a).) Therefore, the Zoning Administrator cannot accurately state with certainty that the ZAI has no possibility of causing a significant effect on the environment.

These exemptions are also inapplicable to projects that result in cumulative impacts. (*San Lorenzo Valley Community Advocate for Responsible Education v. San Lorenzo Unified School District* (2006) 139 Cal.App.4th 1356, 1381.) The 2025 ZAI would result in cumulative environmental impacts from the many other restrictions on oil and gas operations concurrently being adopted, including by the City of Los Angeles and the increased setback provisions adopted by SB 1137, Cal. Public Resources Code § 3280 et seq.

Further, none of the exemptions apply because the unusual circumstances exception under section 15300.2, subdivision (c), bars reliance upon any categorical exemption. An unusual circumstance refers to "some feature of the project that distinguishes it from others in the exempt class." (*San Lorenzo Valley Community Advocate for Responsible Education v. San Lorenzo Unified School District* (2006) 139 Cal.App.4th 1356, 1381.) The ZAI

presents “unusual circumstances” for several reasons. The unusual circumstances exception applies when evidence demonstrates a project will have a significant impact on the environment. (*World Business Academy v. Cal. State Lands Commission* (2018) 24 Cal.App.5th 476, 499.) The ZAI will make it more difficult for operators to maintain their wells, which will restrict development of known mineral resources that would be of value to the region and the residents of the state. This impact to mineral resources constitutes a significant impact on the environment under State CEQA Guidelines. (Cal. Code Regs., tit. 14, Appendix G, section XII(a).) State CEQA Guidelines, Appendix G, section XII(b) similarly finds a resulting significant environmental impact from “the loss of availability of a locally-important mineral resource recovery site delineated on a local general, specific plan or other land use plan[.]” In both respects, the ZAI is easily distinguished from other projects in the exempt class.

For all of these reasons, we urge the City Council to grant the appeal and require City Planning to conduct an environmental review of the 2025 ZAI and all reasonably foreseeable consequences of its adoption of the 2025 ZAI.

Sincerely,

A handwritten signature in blue ink that reads "Matt Wickersham". The signature is written in a cursive, flowing style.

Matthew C. Wickersham

Enclosure

Attachment 1

CITY OF LOS ANGELES

CALIFORNIA

HUBER E. SMUTZ
CHIEF ZONING ADMINISTRATOR

ASSOCIATE ZONING ADMINISTRATORS

CHARLES V. CADWALLADER
ARTHUR DVORIN
MANUS D. O'GRADY
R. A. RUDSER



SAM YORTY
MAYOR

DEPARTMENT OF
CITY PLANNING

OFFICE OF
ZONING ADMINISTRATION

600 CITY HALL
LOS ANGELES, CALIF. 90012
MADISON 4-5211

February 16, 1968

Standard Oil Company of California
ATTENTION: E. J. Taaffe
P. O. Box 606
La Habra, California

Re: Z. A. CASE NO. 19139
100-140 South San Vicente
Boulevard
Oil Drilling District U-6
D. M. No. 5472

Fire Prevention Bureau

Department of Building and Safety

Greetings:

In the matter of the application of Standard Oil Company of California, lessee and operators, for approval of a controlled drill site and for determination of conditions and methods of operation to be followed in drilling for and production of oil and gas on an approximately 1.5-acre site comprising a portion of the Dorothy Hay property, classified in the M2-1-0 Zone, please be advised that based upon the Findings of Fact hereinafter set forth and by virtue of authority contained in Section 13.01-E, F and H of the Municipal Code, the Associate Zoning Administrator hereby authorizes the use of a site comprising:

That portion of Rancho La Brea, more particularly described in the application and located at 100-140 South San Vicente Boulevard and extending approximately 100 to 250 ft. north-easterly thereof;

as a controlled drill site on which to drill wells and conduct surface operations in connection with the development and bottoming of wells under Oil Drilling District No. U-6 consisting of that approximately 43-acre drilling district, depicted and described on the map which is part of Ordinance No. 108,609, as well as for surface operations in connection with wells which by subsequent action may be authorized to be bottomed under adjoining Districts U-151 and U-152 or other adjoining and adjacent districts and portions of the subsurface underlying the City of Beverly Hills; and also authorizes the drilling of not to exceed eight (8) oil wells to be bottomed under said District U-6 and for the production from said wells, if successful, of oil, gas and other hydrocarbon substances, and to maintain such equipment and accessories as they are necessary in the drilling for, and the production of oils, gas and other hydrocarbon substances, upon the following terms and conditions:

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1. That all the conditions set forth in Section 13.01-E,2 (as recently amended and up to and including Ordinance No. 130,465), as well as Conditions Nos. 1, 3, 4, 5, 8, 9, 17, 18, 22, 33, 37, 40, 43, 45, 47, 49, 50, 54, 59 and 60 of Subsection F of Section 13.01 of the Municipal Code are included in and by reference made a part of this approval and shall be complied with to the same extent as if herein restated in detail.
2. That all of the further special limitations and conditions set forth in the various sections, paragraphs and subparagraphs under Section 1 or Ordinance No. 108,609 (Paragraph (f), Section 13.01-G,2 of the Municipal Code) are also included and by reference made a part of this approval and shall also be complied with to the same extent as if herein restated in detail; except that the dimensions of the drill site set forth under Condition No. 1 of said Ordinance No. 108,609 are hereby revised under authority of Amendatory Ordinance No. 110,151, to agree with the dimensions of the drill site under lease to the applicant and described in detail in the application.
3. That as a further qualification and refinement of Condition No. 33 of said Section 13.01-F, it shall be understood that, in order to be considered a producing well, the well shall produce oil, gas or other hydrocarbon substances to a total value of at least fifty dollars (\$50.00) per day.
4. That the Surety Bond in the sum of \$5,000 required by Condition No. 3 of the above-mentioned Subsection F and Condition (g) under Section 13.01-E,2 of the Municipal Code shall be approved by the City Attorney, executed by both the applicant and any lessee who is to do the actual oil drilling and filed with the Zoning Administrator before any permit is issued.
5. That in view of the conflict between the amount of insurance specified in Condition No. X of Subparagraph 3, Section 1 of Ordinance No. 108,609 and Condition No. 60 of Section 13.01-F of the Municipal Code which also applies, and to further qualify and refine said conditions, they are hereby replaced by the following combined condition:

That any owner, lessee or permittee and their successors and assigns, must at all times be insured to the extent of not less than \$1,000,000 against liability in tort including public liability and property damage arising from drilling or production, or activities or operations incidental thereto, conducted or carried on under or by virtue of the conditions prescribed for this district and

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by written determination by the Administrator as provided in Subsection H of Section 13.01 of the Los Angeles Municipal Code. Each such policy shall be conditioned or endorsed to cover such agents, lessees, or representatives of the owner, lessee or permittee as may actually conduct drilling, production or incidental operations permitted by such written determination by the Administrator. The policy of insurance issued pursuant hereto shall be subject to the approval of the City Attorney and duplicates shall be furnished to him. A certificate of insurance carrier and its address and a sworn statement that such insurance will be maintained in full force and effect, shall be furnished the Zoning Administrator before any permits are issued.

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6. That since there is an apparent conflict between the limitations specified in Condition No. XIII under said Subparagraph 3., Section 1 of Ordinance No. 108,609 and Condition No. 54 of Section 13.01-F of the Municipal Code which also applies to activities within the established oil drilling district with respect to petroleum storage facilities, it is the interpretation of the Zoning Administrator that said Condition No. XIII by being the more specific and detailed shall apply with respect to storage facilities, and the limited storage tank facilities may be provided only when necessary to conform the production to pipe line requirements; the location, size and treatment of said tanks to be first submitted to and approved by the Zoning Administrator before being located on the property.
 7. That in addition to soundproofing the derrick and other structures as required by Condition No. 47 of said Section 13.01-F, and Condition No. I under Subparagraph 3 as set forth in Section 1 of Ordinance No. 108,609, soundproofing shall also be provided for the electrical distribution center and control house containing automatic electric switches and for the motors, shakers and mud pumps and for the doors providing ingress and egress to the derrick, and that said doors be kept closed except for short intervals when actually being used for ingress and egress purposes and for placing or removing materials and supplies in or from the derrick. That acoustical soundproofing of the type and nature essentially similar to that specified on Exhibit "O" be provided. Furthermore, that the manner in which the soundproofing is to be accomplished, including a plot plan specifying location of involved buildings or structures and tanks, landscaping of premises, location and type of surfacing on access driveways and other

details for each of the buildings and tanks to be placed on the site, shall be submitted to and approved by a Zoning Administrator prior to the issuance of the drilling permit for the proposed wells and prior to issuance of permits for any such buildings or tanks; said soundproofing material as required above to be of a fire resistive type approved by the Los Angeles Fire Department. If an acoustical quilt-type covering is utilized to soundproof the derrick and buildings, said quilt covering shall be stretched tight, hung and maintained in such manner that it will have a tight attractive non-sagging appearance.

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8. That the controlled drill site shall be enclosed with an ornamental masonry wall having a height of at least 12 ft. above the level of the adjacent property and with design, dimensions and location of said wall conforming substantially with the plans and elevations submitted with the application and marked Exhibits "L" and "M". It being understood that gates in the enclosing wall around the drill site across entrance and exit driveways shall be covered with solid material colored to match or compliment that of the enclosing wall. Furthermore, that the space between the enclosing wall and San Vicente Boulevard, including the space out to the curb line, not utilized for sidewalks, parking or driveway purposes, shall be landscaped with trees, shrubs and green ground cover essentially as shown on the landscaped development plans marked Exhibit "M"; it being understood that any planting in the public street right of way must first be approved by the Bureau of Street Maintenance. The above specified landscaped setback outside the enclosing wall along the street frontage shall in no event be utilized for any of the oil drilling or production activities except for offstreet automobile parking and for necessary ingress and egress driveways and walks.
9. That all portions of the derrick, drawworks and oil well cellars shall be confined to that portion of the site which is at least 30 ft. easterly of the property line along widened San Vicente Boulevard, and that the various buildings and facilities shall be located on the site and be of a design, substantially in conformity with that indicate on the plot plan - Exhibit "N", Architectural Elevations - Exhibit "L", and Isometric Rendering - Exhibit "O", submitted with the application. Furthermore, that the buildings, tanks and other equipment used in drilling and production activities shall be located on the site in such a manner that no portion thereof, other than the upper portion of the derrick, drawwork's house, emergency relief stack, and drilling equipment buildings, temporary mud and water storage tanks and future portable drilling mast used for servicing activities, will extend for any appreciable

distance above the enclosing wall surrounding the drill site in accordance with Condition No. 8. It being understood that the emergency relief stack shall consist of an approximately 12-inch pipe extending not more than 30 ft. above ground elevation and be painted or finished in a color matching other buildings on the site.

Sept. 11, 1968
buff color paint
for derrick & complementary
well enclosures approved
Andrew Brown Co
exterior color coat
to 23522
R.A. Jackson
Trum and Hasbany
spec No 33617

10. That the upper portions of the soundproofed derrick which extend above the walls surrounding the drilling site shall be painted in a uniform light color or camouflaged in such manner as to blend into the sky or present the appearance of an attractive monument rather than a covered oil derrick. The designs of such camouflage treatment or color of paint shall be submitted to the Administrator for approval with plans for soundproofing the derrick, and thereafter the upper portions of the derrick shall be treated and maintained in the manner suggested and approved, all of which shall be designed to eliminate as far as practical the conspicuousness of the derrick from the adjacent residential areas. It is understood that the same type of derrick design and camouflage treatment thereof, heretofore approved for the drilling operation conducted on the applicant's drill site in District U-140 (Z. A. Case No. 18480) may be utilized on the drilling site here in question. However, if the first test wells upon the site prove to be successful and additional wells are to be drilled thereon, then, considering the conspicuousness of the drill site from adjacent well-developed residential area and if deemed necessary by the Zoning Administrator any acoustical quilt-type covering for the first test well equipment shall either be replaced or covered with a more rigid permanent type of attractive soundproof enclosing fixture giving the derrick more the appearance of a monument, all in keeping with plans approved by the Zoning Administrator.

11. That if any of the wells hereby or hereafter authorized, are successful and are to be maintained as producing wells and are required to be pumped, then said wells shall be equipped with Kobe or comparable producing units which shall be placed in pits or cellars below the surface of the ground so that no visible pumping units will be above the ground adjacent to the surface location of the wells and that wells shall be serviced with only portable type equipment. Furthermore, that the triplex pump units necessary to operate the Kobe or comparable oil well pumping units as well as the compressors for compressing the gas to meet pipeline specifications, shall be housed in substantial buildings which have been acoustically treated so as to be substantially soundproofed. It is understood that a permanent-type soundproof masonry building of attractive

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design to house the compressors and triplex pump units as well as the office and control building and placed adjacent to the southerly lease line approximately as indicated on Exhibit "N" attached to the file, may serve as part of the enclosing fixture around the production site if the exterior walls of said buildings are designed and finished in a manner to harmonize with the enclosing wall.

12. That the driveway providing the means of ingress and egress to the controlled drilling site together with other driveways on the site, as well as the required employee parking area specified under Condition No. VII of said Subparagraph (c) under Section 1 of Ordinance No. 108,609 shall be paved with rock and oil or asphaltic paving materials suitable to withstand heavy trucking operations. Further, that all such driveways and parking areas shall be regularly washed down, swept or otherwise kept free of accumulated cement or other materials which would produce dust in the use of said facilities. It being understood that offstreet parking for 17 automobiles located outside of the drill site enclosing fixture and developed essentially as shown on Exhibits "M" and "N" will fulfill the offstreet parking requirement.
13. That in no event shall drilling operations be carried on or conducted on the site in connection with more than one well at a time. Further, that all drilling operations herein authorized to be conducted on the site in accordance with Ordinance No. 108,609 shall be for the development or production of oil from horizons lying below the present producing horizon of the Salt Lake Oil Field as specified in Condition No. XVI, Subparagraph 3, Section 1 of said Ordinance. It is understood that the nonconforming status of existing wells on the drill site and adjacent properties under the same ownership will not be altered by the terms and conditions of this grant, but that said wells will have to be considered separately under the provisions of Section 12.23-C,4 of the Municipal Code. It is also understood that the Administrator under separate applications, may permit exploratory or production wells under adjoining or adjacent districts, utilizing the herein approved controlled drill site.
14. That prior to the approval or issuance of Fire Department permits for each well to be drilled upon the subject site, there shall be supplied to the Zoning Administrator a map showing the general direction and general bottom hole location of said proposed well so that proper records can be kept as to the number of wells bottomed and completed under said district in compliance with the terms of this grant and the provisions of Paragraph (c), Section 13.01-E,2 of the Municipal Code. Furthermore, the

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applicants or operators of the oil drilling activities herein authorized, upon request by the Zoning Administrator, shall furnish such additional information concerning the status, exact bottom hole location, productivity, etc., of the various wells drilled from the property, as to enable the Administrator to properly and intelligently administer the oil drilling regulations in this area; said information to be either verbal or in writing and to be kept confidential by the Administrator if so desired by the applicants.

15. The operator, after drilling each well to a depth of approximately 2,000 ft., shall take an electric log of the well to that depth, analyze the log and provide the Department of Water and Power of the City of Los Angeles with a copy of said log, together with its interpretation showing aquifers and an estimate of the salinity of all waters encountered. From the information so obtained, a joint determination shall be made of the required depth at which the surface casing shall be cemented. Sufficient cement shall be used to reach the ground surface behind the surface casing. On completion of the drilling program, another log shall be taken and analyzed and, if necessary, additional steps shall be taken to prevent the vertical movement of brine into fresh water zones. In the event no commercial production of oil is obtained, cement plugs shall be used to protect all fresh water in abandonment of the well. A conference between the operator and officials of the Department of Water and Power may waive the requirement for a log on each well, if sufficient subsurface data is obtained from previous logs to permit it to carry out the purpose of this condition.
16. That the public water supply system on the property shall be protected against backflow where necessary in a manner acceptable to the Department of Health and Water and Power and meeting the requirements of the Uniform Plumbing Code. Furthermore, representatives of the said Departments may enter upon the premises at any reasonable time for routine investigation of operations. Any necessary changes that may be ordered in operations and/or facilities shall be made within a reasonable time as determined by the investigator.
17. That the drilling site and approaches thereto shall at all times be kept in a clean, neat-appearing condition free from weeds and debris, other than necessary incidental drilling equipment and supplies, and shall be effectively landscaped and maintained as required under various applicable conditions heretofore mentioned and in compliance

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with plans approved by the Zoning Administrator. In this instance, special attention shall be given to effective housekeeping so as to prevent any accumulation of oil, oil products, or oil-coated boards, materials, or equipment which might cause fumes or odors detrimental to occupants of adjoining and adjacent buildings. Furthermore, that upon completion of the drilling operations, all equipment and supplies, except that actually necessary in production work and as specified on plans for the installation of the various production facilities and devices, shall be removed from the property so that, as far as practicable, there be no evidence above the ground of the presence of the oil producing facilities in the pits and cellars heretofore specified.

18. That any signs displayed on the drill site involved shall be of a conservative identification or directional type and, except those required by law or ordinance to be displayed in connection with the drilling or maintenance of the wells, shall be approved by a Zoning Administrator prior to placement on the premises.

The applicants' attention is called to the fact that this determination is not a permit or license, and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, that if any condition of this grant is violated or if the same be not complied with in every respect, then the applicants or their successors in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code. If this property is subleased or assigned to another oil company for drilling or production purposes, it is incumbent upon the applicants to notify said sublessee or assignee of the terms and conditions described above and that the sublessee or assignee must assume all said conditions to the satisfaction of the Administrator. The Associate Zoning Administrator's determination on this matter will become effective after an elapsed period of ten (10) days from the date of this communication, unless an appeal therefrom is filed with the Board of Zoning Adjustment.

FINDINGS OF FACT

After thorough consideration of the statements contained in the application, the proceedings under City Plan Case No. 7331 and Council File No. 75060 which resulted in enactment of Ordinance No. 108609 creating Oil Drilling District U-6 and in amendatory Ordinance No. 110151, under Z. A. Case No. 14136 involving a similar determination of conditions and methods of operation to be followed on the controlled drill site on the major portion of the involved property and reference to subsequent litigation in said file, under Z.A.I. Case No. 2491 extending the termination

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date of Oil Drilling District No. U-6 to April 27, 1968, under Z. A. Case Nos. 18128, 18684, 18850 and 18859 authorizing the exploratory core holes drilled from the site, the proceedings under the several Zone Variance and Planning Commission Cases shown on the vicinity map relating to development on the adjacent properties and the proceedings under Z. A. Case Nos. 18129 and 18480 involving controlled drill sites operated by, or in the interest of, the applicant, all of which are by reference made a part hereof, as well as personal inspection of the drill site in question and the surrounding neighborhood, detailed inspection of similar operations throughout the City and surrounding area, and discussion of the proposed program with the applicant's representatives and the Assistant City Administrative Officer in charge of Petroleum Administration, I find as follows:

1. The property directly involved and to be used as a controlled drilling site comprises a 1-1/2 acre interior portion of a M2 zoned block bounded on all sides by major or secondary highways and developed with a variety of commercial and industrial uses. There are presently 7 non-conforming oil wells on the block, 4 of which are within the controlled drill site and which are to be modernized and maintained pursuant to conditions to be established under impending Z.A.I. Case No. 2575. In the ordinances establishing the involved Oil Drilling District No. U-6 and adjacent District Nos. U-151 and U-152, it was contemplated that a controlled drill site would be established on or near the former controlled drill site in District U-6 and this group of districts developed from said common controlled drill site. Although the drill site involved in this request does not exactly coincide with that described under Ordinance No. 108609, it is a more logical drill site inasmuch as it will encompass more of the non-conforming wells and will permit a more satisfactory drill site layout and substantial improvement in access and parking arrangement. The Zoning Administrator is authorizing the slight modification of dimensions of drill sites under authority of amendatory Ordinance No. 110151. The drill site is well removed from the nearest residential development, is located in a block under the same ownership and which is presently not extensively improved, and is separated from the more recently constructed industrial, commercial and institutional developments by the abutting major thoroughfares. Consequently the site is the most logical and available site within the district from which to conduct the drilling and production operations for the involved and adjacent drilling districts. The applicant holds leases on more than 75% of the property within the district and has submitted a feasibility study indicating owners of property within 300 ft. favor this application.

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2. Although the property is located in the industrial zone and the proposed drilling operation closely approximates other uses which would be permitted in this zone, the fact remains there are residential properties in the vicinity and the immediate area is developed with a higher type of commercial or industrial use which must be adequately protected from possible odor, noise, vibrations, hazards, unsightliness, and extensive truck traffic. It has been proven by experience and particularly with the drilling and production operations now being carried on at other controlled drill sites in urbanized portions of the City, that all the normal objectionable features of oil drilling and production can be controlled so as to cause no detriment to surrounding property, except the conspicuous feature of the oil drilling derrick which must remain on the property during the process of drilling the several wells permitted if production is found. In the instant case, the site is to be enclosed by a 12 ft. high ornamental masonry wall with matching gates which will screen the drill site activities from adjacent properties. A landscaped front setback and parking area is to be provided which will be entirely compatible with adjacent commercial developments. The temporary derrick and drilling equipment will be provided with an acoustical covering and the permanent buildings are of substantial construction. In view of all the above considerations, the authorization of the controlled drill site under the conditions imposed which are necessary to fulfill the intent and purpose of Sections 13.01-E and F of the Municipal Code, will be in keeping with the zoning and will adequately protect the general public and the community from any detrimental features of oil drilling.

Very truly yours,



R. A. RUDSER

Associate Zoning Administrator

RAR:llo

cc: Director of Planning
 Petroleum Administrator
 Lyall A. Pardee, City Engineer
 Department of Public Utilities & Transp.
 Inspector Sevy, L.A.F.D.
 County Health Department
 Department of Water & Power
 State Water Quality Control Board No. 4
 Air Pollution Control District
 ATTENTION: Mr. Murray
 Marcus, Rabwin and Nash, Attorneys
 Walter Gresch, Standard Oil Co.

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Attachment 2

CONSERVATION ELEMENT
OF THE
CITY OF LOS ANGELES GENERAL PLAN

City Plan Case No. 2001-0413-GPA
Council File No. 01-1094

Adopted by the City Council September 26, 2001
Approved by the City Planning Commission March 10, 2001

An Equal Employment Opportunity/Affirmative Action Employer

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.

Element will address the human use aspects of city park sites. The Conservation Element primarily addresses conservation aspects of the natural open spaces that are addressed by the various subjects contained in this element.

SECTION 18: RESOURCE MANAGEMENT: MINERAL RESOURCES (SAND AND GRAVEL)

Natural mineral deposits are nonrenewable resources that cannot be replaced once they are depleted. The primary mineral resources within the city are rock, gravel and sand deposits. Sand and gravel deposits follow the Los Angeles River flood plain, coastal plain and other water bodies and courses. Significant potential deposit sites have been identified by the state geologist. They lie along the flood plain from the San Fernando Valley through the downtown (Exhibit A). Much of the area identified has been developed with structures and is inaccessible for mining extraction.

Mining of sand and gravel began in Los Angeles around 1900 when concrete became popular as a building material. Extraction began in the Arroyo Seco and the Big Tujunga Wash. From 1920 to the present, the demand for sand and gravel has been spurred by construction associated with growth in California and the southwestern United States. The only currently available deposit site in the city is the Tujunga alluvial fan, which is rich in accumulations of high quality sand and gravel washed from the adjacent mountains.

No on- or off-shore mining of beach or ocean sand is permitted by the State of California within the coastal zone or adjoining ocean of the southern California area. This is to protect the beaches and coastline within the region.

Resource protection/extraction regulation. Authority over mining is divided between state and local jurisdictions. The California Lands Commission has permitting authority over mining relative to off-shore lands and inland lands associated with navigable bodies of water. The California Coastal Commission has permitting authority relative to on- and off-shore lands within the coastal zone (extending inland 1,000 yards from the mean high tide line of the Pacific Ocean). The federal Surface Mining Control and Reclamation Act of 1977 is less comprehensive and less restrictive than the state act. Therefore, the California act is the primary regulator of surface mining within the state. However, mine operators must comply with federal, state and local regulations.

California Surface Mining and Reclamation Act of 1975 (SMARA). SMARA (Public Resources Code Section 2710 et seq.; subsequently amended) is the primary regulator of on-shore surface mining in the state. It

delegates specific regulatory authority to local jurisdictions. The act requires the state geologist (Division of Mines and Geology) to identify all mineral deposits within the state and to classify them as: (1) containing little or no mineral deposits, (2) significant deposits or (3) deposits identified but further evaluation needed. Local jurisdictions are required to enact specific plan procedures to guide mineral conservation and extraction at particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of the state legislators in enacting SMARA was premature loss of minerals and protection of sites threatened by development practices which might preclude future mineral extraction.

In 1979 the state Board of Mining and Geology adopted guidelines for the management of mineral resources and preparation of local plans. The guidelines require local general plans to reference the state-identified mineral deposits and sites that are identified by the state geologist for conservation and/or future mineral extraction. Subsequently the board identified urbanized areas where irreversible land uses precluded mineral extraction. Much of Los Angeles was deemed urbanized and, therefore, exempt from SMARA.

The state geologist classified Mineral Resources Zone-2 (MRZ-2) sites within the city (Exhibit A). MRZ-2 sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 sites in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.

California Environmental Quality Act (CEQA). CEQA requires that impacts on non-renewable mineral resources be evaluated relative to proposed development projects. Where significant mineral deposits are known or are believed to exist, evaluation must be made concerning whether the proposed project will preclude extraction activity and whether the project will cause permanent loss of the mineral resource. If a potential negative impact is identified, measures must be considered for mitigation of the impact.

City regulation/management. To comply with SMARA, Los Angeles adopted (1975) the 'G' Surface Mining supplemental use provisions (LAMC Section 13.03). Subsequent amendments have brought the city's provisions into consistency with new state requirements. The 'G' provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic and other potential impacts, as well as post-extraction site restoration. Other conditions may be imposed by the city if deemed appropriate.

General plan references. SMARA requires that the general plan identify the MRZ-2 sites and contain resource management provisions. In addition to this element (Exhibit A), MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans. All three elements contain resource management provisions.

Conservation. It is the city's policy that construction materials, such as concrete and rock, be recycled to reduce the amount of solid waste that goes into local landfills, thereby extending the life of the landfills. Recycling has a secondary benefit of reducing the demand for sand and gravel and produces recycled materials, which can be substituted for the natural materials.

Conclusion. The city is responsible for implementing the California Surface Mining and Reclamation Act requirements, as they apply to Los Angeles. It does so primarily through land use controls and permit issuance and monitoring.

Continuing issues:

N Loss of remaining, accessible sand and gravel deposits.

N Potential future temporary or permanent loss of important ecological sites, especially in the Tujunga Wash, due to mining.

N Environmental and neighborhood compatible extraction and site reclamation.

Resource management - mineral resources (sand and gravel) objective, policies and programs:

Objective: conserve sand and gravel resources and enable appropriate, environmentally sensitive extraction of sand and gravel deposits.

Policy 1: continue to implement the provisions of the California Surface Mining and Reclamation Act (Public Resources Code Section 2710 et seq.) so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites.

Program 1: administration and periodic updating of the 'G' Surface Mining District overlay zone provisions (LAMC 13.03).

Responsibility: departments of Building and Safety and *City Planning.

Program 2: community plan identification of state designated Mineral Resources Zone-2 sites and including of related resource management provisions.

Responsibility: *Department of City Planning.

Policy 2: continue to encourage the reuse of sand and gravel products, such as concrete, and of alternative materials use in order to reduce the demand for extraction of natural sand and gravel.

Program: recycling of construction materials.

Responsibility: *Bureau of Sanitation and city agencies that conduct or oversee construction projects.

For related information see:

N "Infrastructure Systems Element" (landfills), Los Angeles City General Plan (under preparation) and

N Sun Valley and Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plan elements of the Los Angeles City General Plan, Los Angeles Department of City Planning.

SECTION 19: RESOURCE MANAGEMENT (FOSSIL FUELS): OIL

In 1769 a Spanish expedition led by Captain Gaspar de Portolá explored the area now known as Los Angeles. The men discovered "pitch" bubbling from the earth. The pitch was oil tar which still bubbles to the surface in the vicinity of the Los Angeles County Museum of Art and La Brea Tar Pits. Native Indians used the tar as glue and a waterproofing agency. Early settlers and ranchers mined it for a variety of purposes, including for road surfacing. Oil (petroleum) extraction began in 1892 after E.L. Doheny discovered oil near what is now Glendale Boulevard and Second Street. Petroleum extraction and refining continue to be important industries in Los Angeles. Deposits (Exhibit A) underlie portions of downtown and west Los Angeles, the harbor area and the Santa Monica and San Pedro bays. Twenty producing oil fields lie wholly or partially within the city. The Wilmington field is one of the largest in the state. Its 1,332 wells produce 54,612 barrels of oil per day (1996).

Since the early days of oil rigs and open gushers, technology has made drilling, extraction and refining operations safer, more compatible

with surrounding communities and more efficient. Slant drilling and extraction from multiple lines can be accomplished from a single relatively unobtrusive site. For decades the sites have been camouflaged within buildings or behind walls that are designed to make them look like houses, office buildings or other neighborhood compatible structures. State and local regulations protect surrounding neighborhoods from potential odors, noise, hazardous spills, explosions and fires.

Resource protection/extraction regulation.

Federal. The federal government owns submerged lands extending seaward beyond the three-mile state land limit. In 1981 the U.S. Congress began issuing moratoria on expenditure of funds for processing leases within designated offshore tracts (3-mile quadrants). This effectively prohibited issuance of new oil drilling leases by the U.S. Department of Interior within the tracts. In 1984, the moratorium was expanded to include the Santa Monica Bay. All of the southern California shoreline was added in 1985. The ban currently applies to all unleased tracts off the entire west coast, the east coast and parts of Florida and Bristol Bay in Alaska. It is renewed annually by Congress. Various bills were under discussion (1999) to modify the Outer Continental Shelf Lands Act, including modifying or lifting the moratorium.

President George Bush issued an executive order prohibiting the Department of Interior from offering unleased tracts for lease in the same general areas as the expenditure ban. The order expires in 2002. Any President may change a presidential order.

State. The state has regulatory authority over inland lands and owns tidelands and submerged lands extending seaward three miles from the shoreline. Oil and gas deposits within the three-mile limit and on-shore are under the authority of the California Department of Conservation's Division of Oil and Gas. The division regulates extraction of oil and gas, extraction operations and management of oil, gas and geothermal reserves. Drilling permits and off-shore leases are issued by the California Lands Commission.

Consolidated Coastal Sanctuary Act. To protect the coastal ecology, the state legislature (1994) enacted the Consolidated California Coastal Sanctuary Act (Public Resources Code 6240 et seq.). The act consolidated previous coastal protection regulations that had temporarily prohibited issuance of oil drilling leases along individual sections of the California coast. It prohibits offshore drilling within California coastal waters and lands, which were not already leased for drilling. The ban has applied to the Santa Monica Bay since the 1950s. Exceptions allow the commission to issue leases related to national

emergencies and to any company that has a federal lease on adjoining lands, if drilling within the leased three-mile federal quadrant could result in draining an oil reserve that extends into state owned lands.

Coastal Act. The California Coastal Act initiative was approved by state voters (1976) to protect the coastal environment and ensure equitable public access to the beaches and ocean. It invests the California Coastal Commission with the authority of overseeing the coastal zone. The zone is depicted on maps on file with the commission and the city. It extends seaward to the city's outer limit jurisdiction and inland 1,000 yards from the mean high tide line, or further where significant habitats, recreational areas or estuaries exist. The commission establishes policies, standards and procedures for coastal development. It reviews and issues permits for proposed development, including drilling and extraction, within the zone. It can impose conditions on projects or deny permits for projects that are not consistent with the city's local coastal plans (community plans) or that would harm or would interfere with public enjoyment of the coastal environment.

California Environmental Quality Act (CEQA). CEQA requires consideration of potential impacts (e.g., oil spills) of proposed land development projects on the environment. For a project to proceed, potentially negative impacts must be avoided or mitigated to a level of insignificance.

City. For several decades the city has supported the ban on off-shore oil drilling. Its position is due to concern about potential oil spills that could damage the beaches and ecology of the bays.

The city has regulatory authority over on-shore land use within its borders, including issuance of drilling permits, protection of underground water supplies (wells and aquifers), safety considerations relative to hazardous materials management and construction of facilities, consistent with state and federal law. The issue of safety relative to hazardous materials management is addressed in the general plan Safety Element.

The 'O' Oil Drilling supplemental use district provisions of the Municipal Code (Section 13.01) were initially enacted in 1953. They delineate the boundaries within which surface operations for drilling, deepening or operation of an oil well or related facilities are permitted, subject to conditions and requirements set forth in the code and by a Department of City Planning zoning administrator, the Fire Department and city's petroleum administrator of the Office of Administrative and Research Services. The conditions protect surrounding neighborhoods and the environment from potential impacts,

e.g., noise, hazard, spills and visual blight. In addition, the Department of Water and Power monitors drilling operations to assure protection of water wells and aquifers. Property owners, including the city, receive oil production royalties from lands (e.g., city streets) that lie within oil drilling districts (Exhibit A).

Conservation. Petroleum is a non-renewable resource. Many fields in the city already are depleted and extraction from them has been discontinued. Measures related to energy conservation and reducing the city's reliance on oil are addressed by the general plan Infrastructure Systems Element. The city also is experimenting with electric battery vehicles, operates a food container (petroleum product) recycling program and is exploring other ways to reduce reliance on oil and oil products and, thereby, to slow the depletion of petroleum resources.

Other considerations.

Air quality. Oil extracted from the Los Angeles area is heavy in sulfur and other materials that contribute to air pollution. Therefore, Los Angeles oil generally is exported because it is unsuitable for automotive and other local uses, due to potential air quality impacts. Air quality impacts, including petroleum refining operations, are regulated under state and federal law.

Safety issues are addressed by the general plan Safety Element.

Conclusion. The city has primary authority over the issuance and monitoring of land use permits for drilling and drill site restoration. It has an important role to play in lobbying for state and federal concerning permitting and activities that are outside the regulatory authority of the city.

Continuing issues:

N Protection of the Santa Monica and San Pedro bays and inland neighborhoods from potential spills and other hazards potentially associated with oil drilling, production and transport.

N Safe use, storage, transmission and transport.

N Drilling, extraction and site restoration that is compatible with surrounding neighborhoods.

N Depletion of nonrenewable petroleum reserves.

Attachment 3



CITY OF LOS ANGELES
SAN PEDRO
COMMUNITY PLAN
Final Environmental Impact Report

SCH No. 2008021004
City of LA EIR No. ENV-2009-1558-EIR
CPC No. CPC-2009-1557-CPU, CPC-2009-1557-CPU-M1

Volume Ia: Comments and Responses and Changes to the Draft EIR

Prepared for
City of Los Angeles
Department of City Planning
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Los Angeles, California 90012-4801

Prepared by
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12301 Wilshire Boulevard, Suite 430
Los Angeles, California 90025

April 2017

Groundwater

The CPA is located with the geographic boundaries of the Los Angeles Coastal Plain Groundwater Basin. The California Department of Water Resources (DWR) and Metropolitan Water District (MWD) monitor groundwater levels in the basin; however, there are no reported data for the San Pedro CPA. In general, groundwater levels may be influenced by seasonal variations, precipitation, irrigation, soil/rock types, groundwater pumping, and other factors and are subject to fluctuations. Shallow perched⁵³ conditions may be present in places.

Subsidence

Subsidence is a phenomenon where the soils and other earth materials settle or compress, resulting in a lower ground surface elevation. When fill and native materials on a site are water saturated, there is a net decrease in the pore pressure, and contained water will allow the soil grains to pack closer together. This closer grain packing results in less volume and the lowering of the ground surface.

Subsidence in the Los Angeles-Long Beach harbor area was first observed in 1928, and it has affected the majority of the harbor area. Based on extensive studies by the City of Long Beach and the California DOGGR, it has been determined that most of the subsidence was the result of oil and gas production from the Wilmington Oil Field following its discovery in 1936. (Additional information about oil and gas production in the study area is presented under the “Mineral Resources” section, below.) By 1941, subsidence of approximately 1.3 feet was noted in the area of Long Beach. By 1962, subsidence had spread over a wide area and reached approximately 2 feet in the area of Terminal Island. Water injection is used to mitigate subsidence and continues to be maintained at rates greater than the total volume of produced substances, including oil, gas, and water, to prevent further reservoir compaction and subsidence.⁵⁴

■ Mineral Resources

Oil and Gas Production

Drilling for oil in Los Angeles began in 1896, when Edward Doheny discovered oil at Second Street and Glendale Boulevard. Subsequently, oil production became the primary mineral extraction activity in the City. Oil resources have been identified at twenty-three major oil-drilling areas or state-designated oil fields in Los Angeles, which in whole or part underlie the City.⁵⁵ A very small area in the CPA adjoins and is partially within the Wilmington Oil Field⁵⁶ where it crosses the Los Angeles Harbor to the north of the Vincent Thomas Bridge. The oil field is approximately 11 miles long and 3 miles wide, covering approximately 13,500 acres. In 2009 it produced approximately 13.6 million barrels of oil from over 5,000 wells.⁵⁷

⁵³ “Perched” groundwater refers to a water table that is isolated from and higher than the regional water table.

⁵⁴ Los Angeles Harbor Department, *San Pedro Waterfront EIS/EIR* (2008), Section 3.5.2.1.6 (Subsidence).

⁵⁵ Los Angeles Harbor Department, *San Pedro Waterfront EIS/EIR* (2008), Section 3.5.2.1.9 (Mineral Resources).

⁵⁶ California Department of Conservation, Division of Oil, Gas, and Geothermal Resources. *Oil, Gas, and Geothermal Fields in California* (2001).

⁵⁷ California Department of Conservation, Division of Oil Gas and Geothermal Resources, *2009 Preliminary Report of California Oil and Gas Production Statistics* (issued January 2010).

According to California DOGGR records, there are six oil and gas wells in the CPA. All are inactive, with the exception of one well that is idle. That well, which is not within the boundary of Wilmington Oil Field as delineated by DOGGR, is located on South Leland Street in the vicinity of 34th and 36th Streets.⁵⁸

Sand and Gravel

The other primary mineral resources within the City of Los Angeles are rock, gravel, and sand deposits. Sand and gravel deposits follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses. Significant potential deposit sites have been identified by the State Geologist. These deposits are located along the flood plain from the San Fernando Valley through downtown. The State Geologist is responsible for classifying and/or designating certain deposits based on adopted criteria that address the resource development potential of a particular commodity, without regard to land use or ownership. The areas are categorized into four mineral resource zones (MRZs) based on geologic factors. Of the four categories, lands classified as MRZ-2 are of the greatest importance because they identify significant mineral deposits of a particular commodity. There are no deposits in the CPA that have been classified as MRZ-2 by the State Geologist.⁵⁹

4.5.2 Regulatory Framework

■ Federal

U.S. Code Title 42

Federal laws codified in the U.S. Code Title 42, Chapter 86 (Earthquake Hazard Reduction Act of 1977) were enacted to reduce the risks to life and property from earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. Implementation of these requirements are regulated, monitored, and enforced at the state and local level. Key regulations and standards are summarized below.

National Pollutant Discharge Elimination System (NPDES) Phase I Permit

A National Pollutant Discharge Elimination System (NPDES) Phase I Permit is prepared when a project is proposed on a site. As part of the NPDES permit, a Stormwater Pollution Prevention Plan (SWPPP) is prepared in compliance with an NPDES Permit. The SWPPP includes a description of a project site or area, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post-construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary.

The City implements these requirements through its Standard Urban Stormwater Mitigation Plan (SUSMP), which addresses stormwater pollution from new construction and redevelopment projects. The SUSMP requirements contain a list of minimum Best Management Practices (BMPs) that must be

⁵⁸ California Department of Conservation, Division of Oil Gas and Geothermal Resources, DOGGR Online Mapping System (DOMS) (2011).

⁵⁹ Los Angeles Department of City Planning, *General Plan Framework*, Areas of Significant Mineral Deposits.



CITY OF LOS ANGELES GRANADA HILLS–KNOLLWOOD & SYLMAR COMMUNITY PLANS Environmental Impact Report

SCH Nos. 2008021061 & 2008021089
LA City EIR Nos. ENV-2006-5625-EIR & ENV-2006-5624-EIR
CPC Nos. CPC-2006-5568-CPU & CPC-2006-5569-CPU

Volume I: Draft EIR

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October 2012

Groundwater

The CPAs are located within the geographic boundaries of the San Fernando Valley Groundwater Basin. The California Department of Water Resources (DWR) and Metropolitan Water District (MWD) monitor groundwater levels in the basin; however there are no reported data for the Granada Hills–Knollwood and Sylmar CPAs. In general, groundwater levels may be influenced by seasonal variations, precipitation, irrigation, soil/rock types, groundwater pumping, and other factors and are subject to fluctuations. Shallow perched⁴⁶ conditions may be present in places.

Landslides

A landslide is a mass down-slope movement of earth materials under the influence of gravity, and includes a variety of forms including: rockfalls, debris slides, mudflows, block slides, soil slides, slumps, and creeps. These mass movements are triggered or accelerated by earthquake-induced ground motion, increased water content, excessive surface loading, or alteration of existing slopes by man or nature. Earthquake-induced landslides, usually associated with steep canyons and hillsides, can originate on or move down slopes as gentle as one degree in areas underlain by saturated, sandy materials. Areas identified as landslide zones are located along the northern and eastern edges of the Granada Hills–Knollwood CPA north of Rinaldi Street, with the largest area north and west of Sesnon Boulevard. However, smaller landslide prone areas are scattered throughout the hillsides north of Rinaldi Street. Smaller landslide-prone areas are also located in the southern portion of the Sylmar CPA east of the I-5 Freeway and north of Hubbard Street.

Subsidence

Subsidence is a phenomenon where the soils and other earth materials settle or compress, resulting in a lower ground surface elevation. When fill and native materials on a site are water saturated, there is a net decrease in the pore pressure, and contained water will allow the soil grains to pack closer together. This closer grain packing results in less volume and the lowering of the ground surface. Subsidence is generally predominant in coastal areas, where intrusion of seawater and a high water table combine to cause the phenomenon. There are no areas in the Granada Hills–Knollwood or Sylmar CPAs that are susceptible to subsidence.

■ Mineral Resources

This section of the EIR describes existing mineral resources conditions for the CPAs and analyzes the potential physical environmental effects related to mineral resources associated with implementation of the proposed Community Plans. The EIR evaluates the environmental impacts related to mineral resources based upon information from a variety of sources, including the City of Los Angeles General Plan and the City of Los Angeles Zone Information and Map Access System (ZIMAS), as well as previously published information from the U.S. Geological Survey and the CGS, formerly California Division of Mines and Geology (CDMG). A regulatory framework is also provided in this section describing applicable agencies and regulations related to minerals.

⁴⁶ “Perched” groundwater refers to a water table that is isolated from and higher than the regional water table.

As set forth in CEQA Guidelines Section 15125(a) the following Environmental Setting discussion describes the physical environmental conditions in the CPA at the time the environmental analysis commenced. It constitutes the baseline physical conditions by which the City of Los Angeles will determine whether a Mineral Resources impact is significant. Special emphasis is placed on environmental resources that are rare or unique to the CPA and that may be affected by the adoption and implementation of the proposed plans. Full reference-list entries for all cited materials are provided in Section 4.5.5.

Oil and Gas Production

Drilling for oil in Los Angeles began in 1896, when Edward Doheny discovered oil at Second Street and Glendale Boulevard. Subsequently, oil production became the primary mineral extraction activity in the City. Oil resources have been identified at twenty-three major oil-drilling areas or state-designated oil fields in Los Angeles, which in whole or part underlie the City.

Oil and gas seeps are common occurrences in many parts of California, including in and around the CPAs. Historically drilling for oil in this part of Los Angeles began in 1896. Much of the area south of the Santa Monica Mountains is underlain by gas and oil deposits. Oil resources have been identified at twenty-three major oil drilling areas or state-designated oil fields in Los Angeles, which in whole or part underlie the City. According to the Department of Conservation Division of Oil, Gas and Geothermal Resources, and the City of Los Angeles General Plan Safety Element, three production and reserve areas exists within the Granada Hills–Knollwood CPA: the Aliso Canyon Oil Field, the Mission Oil Field, and the Cheviot Hill Oil Field (Figure 4.5-5 [State-Designated Oil Fields]). There are no oil fields in the Sylmar CPA.

The Aliso Canyon Oil Field is located in the northwest portion of the Granada Hills–Knollwood CPA. Aliso Canyon Oil Field currently operates thirty-three wells, which produce an average of 10 barrels (bbl) of oil per day. The oil field produced 130,246 bbl of oil and condensate, and 62.6 million cubic feet (MMcf) of gas in 2006. As of December 31, 2007, the Aliso Canyon oil field is estimated to have approximately 5.375 million bbl (MMbbl) of oil reserves and 195 MMcf of gas reserves. Aliso Canyon oil field also operates gas storage facilities. The Cheviot Hills Oil Field is located in the north central portion of the Granada Hills–Knollwood CPA. This oil field currently has thirteen producing and nine shut-in wells. The wells produce an average of 12 bbl of oil per day. In 2006, the wells produced 57,831 bbl of oil and condensate, and 42.3 MMcf of gas. As of December 31, 2007, the Cheviot Hills Oil Field had an estimated reserve of 1.198 MMbbl of oil and 1.02 MMcf of gas. The Mission Oil Field is located in the southcentral area of the Granada Hills–Knollwood CPA; this field has been abandoned and is no longer in operation.

Surface Mining

Mining activities within the state are regulated by the Surface Mining and Reclamation Act (SMARA). The Act provides for the reclamation of mined lands and directs the State Geologist to classify (identify and map) the nonfuel mineral resources of the state to show where economically significant mineral deposits occur and where they are likely to occur based upon the best available scientific data. Based in guidelines adopted by the CGS, areas known as Mineral Resource Zones (MRZ) are classified according

Impact 4.5-8 Implementation of the proposed plans would not result in the loss of, or loss of access to, a mineral resource located in an MRZ-2 zone or other known or potential mineral resource area, or result in the permanent loss of, or loss of access to, a mineral resource of regional or statewide significance. The impact would be *less than significant*.

Granada Hills–Knollwood

Oil and Gas Production

As shown in Figure 4.5-5 (State Designated Oil Fields), state-designated oil fields are located within the northern portion of the Granada Hills–Knollwood CPA. Much of this area is zoned as Open Space and would remain so, as few changes are proposed by the Granada Hills–Knollwood proposed plan. There are some areas within the state designated oil fields where proposed plan land use changes are proposed. These areas are largely developed with single-family homes and changes proposed by the proposed plan would either limit hillside development or create consistency between the Framework land use designations and the proposed plan and would not restrict the extraction of oil from these areas. However, some development could occur within the state-designated oil fields and result in the potential to result in the loss of availability of a known and/or locally important mineral resource.

Policies in the Granada Hills–Knollwood Community Plan as well as existing Safety and Conservation Element policies would minimize potential impacts associated with the loss of a known and/or locally important mineral resource. These policies include Conservation Element Policies 1 and 2 under Sand and Gravel resources; Policies 1, 2, and 3 under Oil and Gas resources; and proposed plan policy CF7.1. Policies in the General Plan seek to implement the provisions of the SMARA (Public Resources Code Sections 2710 et seq.) so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and require appropriate restoration, reclamation and reuse of closed sites. Policies in the proposed plan include conserving and enhancing natural amenities; minimizing grading and infringing on natural topography; and protecting hillside properties for private and public recreational uses. These policies would minimize development in areas in the CPA near and overlying state-designated oil fields and would not interfere with the extraction of oil and gas resources. Additionally, City policies to allow and regulate are described in Section 13.01 of the LAMC, which identifies provisions for districts where production of oil and gas is permitted and how it shall be undertaken.

Implementation of the City’s Codes, regulatory requirements, proposed Community Plan policies, and existing policies described above would ensure that this impact would be *less than significant*, and no additional mitigation measures are required.

Sylmar

Surface Mining

As shown in Figure 4.5-6 (Sand and Gravel Deposits), significant mineral resource deposits are located within the eastern portion of the Sylmar CPA. Much of this area is currently zoned Open Space and Public Facilities and some smaller portions are zoned Industrial and Single-Family Residential. Most of



Hollywood Community Plan Update

Environmental Case: ENV-2016-1451-EIR
State Clearinghouse No.: 2016041093

Project Location: The Hollywood Community Plan Area (CPA) is located within the incorporated City of Los Angeles and contains approximately 13,962 acres or 21.8 square miles. The CPA extends roughly south of the Cities of Burbank and Glendale and the Ventura Freeway (State Highway 134), west of the Golden State Freeway (Interstate 5), north of Melrose Avenue and south of Mulholland Drive and the Cities of West Hollywood and Beverly Hills, including land south of the City of West Hollywood, and north of Rosewood Avenue, between La Cienega Boulevard and La Brea Avenue.

Council District: 4 (Raman), 5 (Koretz), 13 (O'Farrell)

Project Description: The Hollywood Community Plan Update (Project) would guide development for the Hollywood CPA through 2040 and includes amending both the text and the land use map of the Hollywood Community Plan. The Proposed Project would also adopt several resolutions and zoning ordinances to implement the updates to the Community Plan, including changes for certain portions of the Hollywood CPA to allow specific uses and changes to development standards (including height, floor area ratio (FAR), and density). These zoning ordinances would take a number of different forms, including amendments to the Zoning Map for zone and height district changes under Los Angeles Municipal Code (LAMC) Section 12.32, amendments to an existing specific plan (Vermont/Western Transit Oriented District Specific Plan), and adoption of a Hollywood Community Plan Implementation Overlay (CPIO) District. Also, to ensure consistency between the updated Community Plan and other City plans and ordinances, the Proposed Project includes amendments to the Framework and Mobility Elements of the General Plan, and other elements as necessary.

PREPARED FOR:

The City of Los Angeles
Department of City Planning

PREPARED BY:

Terry A. Hayes Associates Inc.

TABLE 4.11-1: RELEVANT GENERAL PLAN MINERAL RESOURCES POLICIES	
Objective/Policy	Objective/Policy Description
CONSERVATION ELEMENT - RESOURCE MANAGEMENT: MINERAL RESOURCES (SAND AND GRAVEL)	
Objective	Conserve sand and gravel resources and enable appropriate, environmentally sensitive extraction of sand and gravel deposits.
Policy 1	Continue to implement the provisions of the California Surface Mining and Reclamation Act (Public Resources Code Section 2710 et seq.) so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas (e.g., the Tujunga Wash) and ground water; to protect the public health and safety; and to require appropriate restoration, reclamation and reuse of closed sites.
Policy 2	Continue to encourage the reuse of sand and gravel products, such as concrete, and of alternative materials use in order to reduce the demand for extraction of natural sand and gravel.
CONSERVATION ELEMENT - RESOURCE MANAGEMENT (FOSSIL FUELS): OIL	
Objective	Conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits located within the City's jurisdiction so as to protect the petroleum resources for the use of future generations and to reduce the City's dependency on imported petroleum and petroleum products.
SOURCE: City of Los Angeles, <i>General Plan Conservation Element</i> , 2001.	

Los Angeles Municipal Code (LAMC). To comply with SMARA, the City adopted the 'G' Surface Mining supplemental use provisions of LAMC Section 13.03 in 1975. Subsequent amendments have brought the City's provisions into consistency with new State requirements. The 'G' (Surface Mining District) provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post-extraction site restoration.

EXISTING SETTING

Mineral resources are defined in the City's General Plan Conservation Element as nonrenewable resources that cannot be replaced once depleted. Primary mineral resources identified within the City include rock, gravel and sand deposits that follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses; as well as oil. Mining for sand and gravel in the City began in the early-1900s in the Arroyo Seco and the Big Tujunga Wash when concrete became popular as a building material.

SAND AND GRAVEL

As shown in **Figure 4.11-1**, the Project Area is classified as MRZ-1, MRZ-2, and MRZ-3. In addition, as the Project Area consists of urbanized areas and open space uses, no sand and gravel mines have been identified in the Project Area. The foothills and flatland portions of the Project Area generally west of Normandie Avenue and pockets of areas in the eastern portion of the Project Area are classified as MRZ-1, which indicates that these areas have little or no likelihood for the presence of significant mineral resources. These areas are developed urbanized areas consisting of commercial, residential, industrial, open space, and public facilities areas. The northernmost and northeastern portions of the Project Area, specifically within the Griffith Park area, are classified as MRZ-2, which indicates that these areas are underlain by mineral deposits where geologic data indicates that significant measured or indicated resources are present. The MRZ-2 classified areas within the Project Area are zoned OS or PF and have either an Open Space or Public Facilities land use designation, which may include undeveloped open space, recreational areas, and public roadways. The majority of the Project Area is classified as MRZ-3, which indicate that these areas contain known mineral occurrences of undetermined mineral resources significance. Portions of the Project Area that are within MRZ-3 include a majority of the hillside area in the northern portion of the Project Area, a majority of the area east of Normandie Avenue, and a portion of the Project Area south of Santa Monica Boulevard generally between Hudson Avenue and North Saint Andrews Place.

OIL

Oil or petroleum extraction began in Los Angeles in 1892 after E.L. Doheny discovered oil near what is now Glendale Boulevard and Second Street. Petroleum extraction and refining continue to be important industries in the City. Petroleum sources in the City stem from the Lower Pliocene (three to five million years old) and from the Upper Miocene (five to 11 million years old) rock formations. Petroleum deposits within the City primarily underlie portions of downtown and west Los Angeles, the harbor area and the Santa Monica and San Pedro bays. The only petroleum sources located within the Project Area is the Salt Lake Field, which is located in the southern portion of the Project Area, as shown in **Figure 4.11-2**. The Salt Lake Field was discovered in the 1890s by Arthur F. Gilmore with oil production activities occurring from the early 1920s until 1935. The Salt Lake Field extends to and underlies the La Brea Tar Pits which continues to produce tar but not oil. Existing uses within the Project Area that are located within the Salt Lake Field include a high school, commercial uses, and residential uses.

Areas of the City in which drilling of oil wells or the production from the wells of oil, gases or other hydrocarbon substances are permitted in the Supplemental Use Oil Drilling District (“O” District).

Figure 4.11-2 identifies 17 oil well sites located within the Project Area. As shown in further detail in **Table 4.11-2**, oil wells located within the Project Area are identified as plugged, idle, or buried and idle. Plugged wells prevent fluid from migrating between underground rock layers. Idle wells are identified as not having produced oil or natural gas for six consecutive months of continuous operation during the last five or more years. Buried-idle wells are characterized the same as idle wells and are also buried. If oil extraction activities were to resume in plugged or idle wells, appropriate approvals from the City’s Office of Zoning Administration would need to be obtained in conformance with LAMC Section 13.01. No active oil wells are identified in the Project Area.

TABLE 4.11-2: OIL WELL SITES WITHIN THE PROJECT AREA		
Key to Figure 4.11-2	Operator Name	Oil Well Status/a/
1	Black Wolf Canon Oil Co.	Buried-Idle
2	Gaddie Development Co.	Plugged
3	Chevron U.S.A. Inc.	Plugged
4	Union Oil Company of California	Plugged
5	Chevron U.S.A. Inc.	Plugged
6	Chevron U.S.A. Inc.	Plugged
7	Chevron U.S.A. Inc.	Plugged
8	Rancho La Brea Oil Co.	Plugged
9	Rancho La Brea Oil Co.	Plugged
10	Rancho La Brea Oil Co.	Idle
11	Rancho La Brea Oil Co.	Plugged
12	Rancho La Brea Oil Co.	Plugged
13	Rancho La Brea Oil Co.	Plugged
14	Rancho La Brea Oil Co.	Plugged
15	Rancho La Brea Oil Co.	Plugged
16	Rancho La Brea Oil Co.	Plugged
17	Rancho La Brea Oil Co.	Plugged

/a/Plugged: Well is plugged by placing cement in the well-bore or casing at certain intervals as specified in California laws or regulations. The purpose of the cement is to seal the wellbore or casing and prevent fluid from migrating between underground rock layers.

Idle: Any well that has not produced oil or natural gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years.

Buried-Idle: Any buried well that has not produced oil or natural gas or has not been used for injection for six consecutive months of continuous operation during the last five or more years.

SOURCE: State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, November 2016.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, the Proposed Plan would have a significant impact related to mineral resources if they would:

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

METHODOLOGY

Development that includes placement of structures over mineral resource areas, or blocks access to a mineral resource area, is deemed to result in the loss of availability of resources. Impacts are determined based on whether the Proposed Plan would result in a loss of, or loss of access to, identified mineral resources, and whether the loss of access would be permanent. The importance of the mineral resource on a state, regional and local level, in terms of economic value, remaining supply, and feasibility of recovering the resource is also taken into consideration.

The impact analysis for mineral resources was based on several factors, including the policies and land uses of the Proposed Plan, the degree to which existing land uses would change with of the reasonably expected development under the Proposed Plan, the proximity of land use changes to mineral resources, and the thresholds of significance for mineral resources.

IMPACTS

IMPACT 4.11-1 Would implementation of the Proposed Plan 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? **No impact.**

As discussed in the Existing Setting section, the Project Area is classified as MRZ-1, MRZ-2, and MRZ-3. MRZ-1 areas indicate little or no likelihood for the presence of significant mineral resources, and MRZ-3 indicate that such areas contain known mineral occurrences of undetermined mineral resources significance. Thus, based on these classifications, the MRZ-1 and MRZ-3 do not identify the presence of significant resources. Portions of the Project Area that are classified as MRZ-2 have the potential to have important mineral resources. The MRZ-2 classified areas within the Project Area are zoned OS or PF and have either an Open Space or Public Facilities land use designation, which includes uses such as undeveloped open space, recreational areas, and public roadways. Specifically, MRZ-2 classified areas include Griffith Park, Mount Hollywood, Spring Canyon, Fern Canyon, Interstate 5, and State Route 134. Regardless of the MRZ-2 classification, the existing zoning and land use designations do not allow for the extraction of mineral resources, and resource recovery does not occur in the Project Area.

The Project Area is not underlain with active oil fields. The southern portion of the Project Area, is underlain by the Salt Lake Field, as shown in **Figure 4.11-2**. As detailed in **Table 4.11-2**, the existing oil wells located in the Project Area are inactive and designated as buried-idle, plugged or idle. The Proposed Plan does not include provisions that would introduce new oil districts or oil producing uses. While mineral resources are known or are likely to occur in the Project Area, the Proposed Plan does not include provisions to reduce the availability of these resources and does not include plans to extract known mineral resources

in the Project Area. Additionally, the zoning and land use designation in the MRZ-2 areas would remain unchanged under the Proposed Plan. Therefore, implementation of the Proposed Plan would not result in the loss of availability of mineral resources, and *no impact* would occur.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

IMPACT 4.11-2 Would implementation of the Proposed Plan result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan? **No impact.**

As discussed under Impact 4.11-1, above, the Proposed Plan does not include provisions to reduce the availability of mineral resources or include policies that would encourage extraction of known mineral resources in the Project Area. Currently, resource recovery does not occur in the Project Area, and the Proposed Plan does not include any policies that would result in the loss of availability or access to such resources. The Proposed Plan would not result in the recovery of resources in the MRZ-2 area and would not preclude the recovery of such resources. The MRZ-2 areas within the Project Area are zoned OS or PF and have land use designations of Open Space or Public Facilities. The existing zoning and land use designations do not allow for the extraction of mineral resources. The zoning and land use designations for this area would remain unchanged under the Proposed Plan. There are no locally important mineral resource recovery sites delineated in the General Plan or any other City or local plan. Therefore, the Proposed Plan would not result in the loss of access to or availability of an important mineral resource recovery site delineated.

The Conservation Element contains policies related to the loss of a known and/or locally important mineral resource. These policies seek to implement the provisions of SMARA so as to establish extraction operations at appropriate sites; to minimize operation impacts on adjacent uses, ecologically important areas and groundwater; to protect the public health and safety; and require appropriate restoration, reclamation and reuse of closed sites. Additionally, the Conservation Element has an objective, policies, and programs to conserve petroleum resources and enable appropriate, environmentally sensitive extraction of petroleum deposits so as to protect the petroleum resources for the use of future generations and to reduce the City's dependency on imported petroleum and petroleum products. The Proposed Plan does not include components that would be inconsistent with the Conservation Element.

The Proposed Plan does not include any policies that would result in the extraction of sand, gravel, or oil resources or further preclude the extraction of such resources and would not introduce new oil districts or oil producing uses. Implementation of the Proposed Plan would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific land or other land use plan. Therefore, there will be *no impacts* related to mineral resources.

Mitigation Measures

No mitigation measures are required.

Significance of Impacts after Mitigation

No impact.

JORDAN DOWNS SPECIFIC PLAN FINAL ENVIRONMENTAL IMPACT REPORT

**STATE CLEARINGHOUSE NO. 2010021007
ENVIRONMENTAL CASE NO. ENV-2010-0032-EIR**

Prepared for

CITY OF LOS ANGELES
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September 1, 2011

IV.K MINERAL RESOURCES

INTRODUCTION

This section addresses the potential impacts of the proposed project on mineral resources. The analysis describes the existing physical conditions of the Specific Plan area and the regulatory setting as it relates to mineral resources. Impacts to mineral resources are addressed in terms of whether the implementation of the proposed project would result in the permanent loss of or loss of access to any such mineral resources occurring within the Specific Plan area.

ENVIRONMENTAL SETTING

In 1979, the California State Mining and Geology Board (SMGB) adopted guidelines for the management of mineral resources and preparation of local plans. The guidelines require local general plans to reference the State-identified mineral deposits and sites that are identified by the State geologist for conservation and/or future mineral extraction. Subsequently, the SMGB identified urbanized areas where irreversible land uses precluded mineral extraction.

While the majority of the Specific Plan area is within the Southeast Los Angeles Community Plan Area of the City of Los Angeles, approximately 41.74 acres of the Specific Plan area are currently within unincorporated Los Angeles County. Mineral resource sites within the City and County of Los Angeles have been classified by the State geologist as Mineral Resources Zone (MRZ), according to the known or inferred mineral potential of such sites. MRZ sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. According to the City of Los Angeles General Plan Framework EIR, no portion of the Specific Plan area contains MRZ sites.¹ Similarly, no portion of the Specific Plan area currently within unincorporated Los Angeles County contains MRZ sites.²

Additionally, the Los Angeles Basin is known to be a source of petroleum. Most of the petroleum is from the Lower Pliocene (three to five million years old) and from the Upper Miocene (five to 11 million years old) rock formations. The Specific Plan area is not located within an “O” (Oil Drilling) District, City-designated Oil Drilling/Surface Mining Supplemental Use District, or City-designated Oil Field/Drilling Area.³ Similarly, no portion of the Specific Plan area currently within unincorporated Los Angeles County contains oil or gas resources.⁴

Regulatory Framework

California Surface Mining and Reclamation Act of 1975 (SMARA). The California Surface Mining and Reclamation Act of 1975 (SMARA, Public Resources Code Section 2710 et seq.; subsequently amended) is the primary regulator of on-shore surface mining in the State. It delegates specific regulatory authority to local jurisdictions. SMARA requires the State geologist (Division of Mines and Geology) to identify all mineral deposits within the State and to classify them as: (1) containing little or no mineral deposits, (2) significant deposits or (3) deposits identified but further evaluation needed. Local jurisdictions are required to enact specific plan procedures to guide mineral conservation and extraction at

¹City of Los Angeles, *City of Los Angeles General Plan Framework EIR*, Figures GS-1 and GS-6.

²County of Los Angeles 2008 Draft General Plan, Conservation and Open Space Element, Figure 6.5 L.A. County Natural Resource Areas.

³City of Los Angeles, *City of Los Angeles General Plan Conservation Element*, Mineral Resources Exhibit A, September 2001.

⁴County of Los Angeles 2008 Draft General Plan, *Conservation and Open Space Element*, Figure 6.5 L.A. County Natural Resource Areas.

particular sites and to incorporate mineral resource management policies into their general plans. A particular concern of the State legislators in enacting SMARA was premature loss of minerals and protection of sites threatened by development practices which might preclude future mineral extraction. Much of Los Angeles was deemed urbanized and, therefore, exempt from SMARA.

City of Los Angeles General Plan Conservation Element. The City of Los Angeles General Plan provides growth and development policies by providing a comprehensive long-range view of the City as a whole. The Conservation Element of the General Plan consists of an identification and analysis of the existing natural resources in the City of Los Angeles. Policies of the Conservation Element include the preservation of mineral resources and of the access to these resources. Much of the area within the MRZ sites in Los Angeles was developed with structures prior to the MRZ classification and, therefore, is unavailable for extraction.

City of Los Angeles Municipal Code (LAMC). To comply with SMARA, the City of Los Angeles adopted (1975) the 'G' Surface Mining supplemental use provisions (LAMC Section 13.03). Subsequent amendments have brought the City's provisions into consistency with new state requirements. The 'G' provisions are land use, not mineral conservation regulations. They regulate the establishment of sand and gravel districts, extraction operations, mitigation of potential noise, dust, traffic, and other potential impacts, as well as post-extraction site restoration. Other conditions may be imposed by the City if deemed appropriate.

The 'O' Oil Drilling supplemental use district provisions of the Municipal Code (Section 13.01) were initially enacted in 1953. They delineate the boundaries within which surface operations for drilling, deepening, or operation of an oil well or related facilities are permitted, subject to conditions and requirements set forth in the code and by a Department of City Planning Zoning Administrator, the Fire Department, and city's petroleum administrator of the Office of Administrative and Research Services. The conditions protect surrounding neighborhoods and the environment from potential impacts, e.g., noise, hazard, spills, and visual blight. In addition, the Department of Water and Power monitors drilling operations to assure protection of water wells and aquifers. Property owners, including the City, receive oil production royalties from lands (e.g., city streets) that lie within oil drilling districts.

ENVIRONMENTAL IMPACTS

Significance Thresholds

In accordance with Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact on mineral resources if the proposed project were to:

- 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; and/or
- 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.

Project Design Features

No Project Design Features are proposed with regard to mineral resources.

Analysis of Proposed Project Impacts

The Specific Plan area is located within a highly urbanized area of Southeast Los Angeles and has been previously disturbed by development. In addition, the Specific Plan area is not located within a City- or County-designated Mineral Resource Zone (MRZ) where significant mineral deposits are known to be present or within a mineral producing area as classified by the State geologist. Furthermore, the Specific Plan area is not located within a designated Oil Drilling/Surface Mining Supplemental Use District, or City-designated Oil Field/Drilling Area. No mineral or oil extraction operations occur on the Specific Plan area or in the vicinity of the proposed project. As such, the potential for mineral resources to occur on-site is low. Implementation of the proposed project would not result in the loss or non-availability of any known, regionally valuable mineral resource, and the proposed project would not result in impacts to a mineral resource recovery site. Therefore, no impacts to mineral resources would occur.

CUMULATIVE IMPACTS

As with the proposed project, the nine related projects that have been identified within one-mile of the Specific Plan area (shown in Table III-1 and Figure III-1 in Section III Environmental Setting of this Draft EIR) would be reviewed on a case-by-case basis to ensure that no significant impacts to mineral resources would occur. However, no City-or County-designated Mineral Resource Zones or Oil Drilling/Surface Mining areas have been identified within the Specific Plan area or in the vicinity of the proposed project. Therefore, impacts to mineral resources would not be cumulatively considerable.

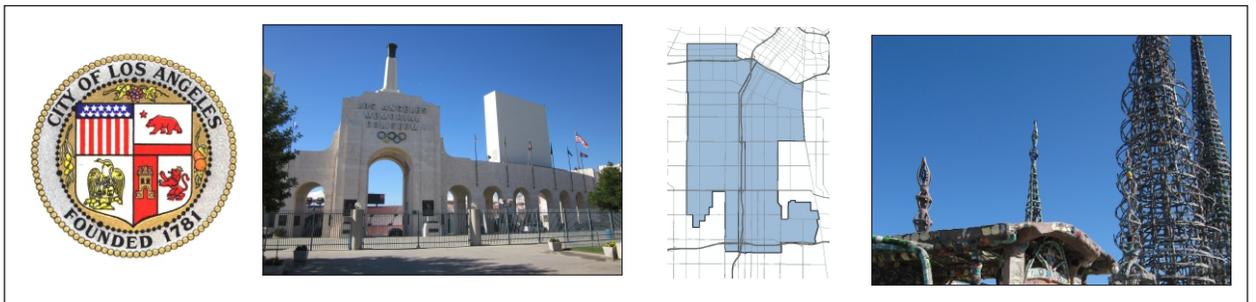
MITIGATION MEASURES

Impacts related to mineral resources would not occur. Therefore, mitigation measures are not necessary.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to mineral resources would remain less than significant.

**SOUTH LOS ANGELES AND SOUTHEAST LOS ANGELES
COMMUNITY PLANS
DRAFT ENVIRONMENTAL IMPACT REPORT
VOLUME I**



PREPARED FOR

**CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING**

PREPARED BY

TERRY A. HAYES ASSOCIATES INC.

NOVEMBER 2016



TAHA 2016-021

4.11 MINERAL RESOURCES

This section provides an overview of mineral resources in the CPAs and evaluates impacts associated with the Proposed Plans. The analysis of impacts is based upon information from a variety of sources, including the City of Los Angeles General Plan Conservation Element and the State of California Department of Conservation. Topics addressed include sand, gravel, and oil.

EXISTING SETTING

Mineral resources are defined in the City of Los Angeles General Plan Conservation Element as nonrenewable resources that cannot be replaced once they are depleted. The primary mineral resources within the City are rock, gravel and sand deposits which follow the Los Angeles River flood plain, coastal plain, and other water bodies and courses, as well as oil. According to the Conservation Element, mining of sand and gravel began in Los Angeles around 1900 in the Arroyo Seco and the Big Tujunga Wash when concrete became popular as a building material. Oil or petroleum extraction began in Los Angeles in 1892 after E.L. Doheny discovered oil near what is now Glendale Boulevard and Second Street. Petroleum extraction and refining continue to be important industries in Los Angeles. Most of the petroleum in the City is from the Lower Pliocene (three to five million years old) and from the Upper Miocene (five to 11 million years old) rock formations. Petroleum deposits within the City primarily underlie portions of downtown and west Los Angeles, the harbor area and the Santa Monica and San Pedro bays. The CPAs are primarily located adjacent to the Downtown Los Angeles petroleum deposit, and there are four oil fields partially located within the CPA boundaries or along their perimeter. Both CPAs contain some portion of the Las Cienegas Oil Field and the Los Angeles Downtown Oil Field. In addition, the Howard Townsite Oil Field is located along the southwestern perimeter of the South Los Angeles CPA, and the Rosecrans Oil Field is located along the southern boundary of the South Los Angeles CPA and the southwestern boundary of the Southeast Los Angeles CPA.

As described under Regulatory Framework, the State Mining and Geology Board (SMGB) designates four different types of resource sensitivities according to the presence or absence of significant deposits, which indicate the potential for a specific area to contain mineral resources by identifying Mineral Resource Zones (MRZs). The Mineral Resource Zone-2 (MRZ-2) sensitivity type exists within both CPAs. MRZ-2 areas are underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present or where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood for their presence exists.

SAND AND GRAVEL

Within the Southeast Los Angeles CPA, areas north of Slauson Avenue have been classified MRZ-2, and within the South Los Angeles CPA, a small MRZ-2 area is partially located along Figueroa Street between Exposition Boulevard and Vernon Avenue (**Figure 4.11-1**).¹ The MRZ-2 classification indicates that these areas contain or are likely to contain significant mineral resources. Although these areas are classified MRZ-2, no aggregate extraction activities currently occur in either CPA. These areas are built out with urban uses making it inaccessible for such activities.

¹City of Los Angeles, *City of Los Angeles General Plan Framework EIR*, Figures GS-1 and GS-6.

OIL

As shown in **Figure 4.11-2**, the Downtown Los Angeles and Las Cienegas Oil Fields are partially located in the northern area of both the South and Southeast Los Angeles CPAs.² In addition, the Howard Townsite Oil Field is partially located in the southwestern area of the South Los Angeles CPA. The Rosecrans Oil Field is located outside the CPA boundaries at 120th Street, just south of the South Los Angeles CPA and southwest of the Southeast Los Angeles CPA. In 2014, the Las Cienegas Oil Field produced 295,786 barrels of oil and 295,741 thousand cubic feet of gas; the Los Angeles Downtown Oil Field produced 14,374 barrels of oil and 6,086 thousand cubic feet of gas; and the Howard Townsite Oil Field produced 6,888 barrels of oil and 11,958 thousand cubic feet of gas.³

Figure 4.11-2 also illustrates the location of the Oil Drilling Supplemental Use District (O District) which generally overlays the Downtown Los Angeles and Las Cienegas Oil Fields. The northwest corner of the Southeast Los Angeles CPA is zoned as an O District, as is a portion of the South Los Angeles CPA, generally south of the I-10 Freeway. The drilling of oil wells and the production of oil, gases or other hydrocarbon substances from wells is permitted within the O District subject to the provisions of Los Angeles Municipal Code (LAMC) Section 13.01.

There are 19 oil well sites located within the South Los Angeles CPA and 12 oil well sites located within the Southeast Los Angeles CPA (**Figure 4.11-2**). These oil producing sites are located both inside and outside of the O District. Oil well sites include either numerous wells located in clusters or singular wells of varying statuses or activity levels. The wells are either active, plugged to prevent fluid from migrating between underground rock layers, or idle and have not produced oil or natural gas for six consecutive months of continuous operation during the last five or more years. If oil extraction activities were to resume in plugged or idle wells, appropriate approvals from the Office of Zoning Administration would need to be obtained in conformance with LAMC Section 13.01. Of the 19 oil well sites in the South Los Angeles CPA, only 3 sites have an active status. Examples of operational oil wells would be leaseholds under the ownership of Freeport McMoRan with various tenants holding a lease interest in the property to extract subsurface resources. In the Southeast Los Angeles CPA, the 12 oil well sites contain wells that are either plugged or idle and currently no extraction activities occur in the CPA. In addition, singular oil wells are located at the perimeter of both CPAs in the Howard Townsite and Rosecrans Oil Fields. Many of these wells are dry and have been plugged and abandoned. **Table 4.11-1** lists the current status of the wells within the CPAs.

REGULATORY FRAMEWORK

STATE

Surface Mining and Reclamation Act of 1975 (SMARA). SMARA requires that the State Mining and Geology Board (SMGB) map areas throughout the State of California that contain regionally significant mineral resources by identifying Mineral Resource Zones (MRZs). Construction aggregate resources (sand and gravel) deposits were the first commodity selected for classification by the SMGB. Once mapped, the SMGB is required to designate for future use those areas that contain aggregate deposits that are of prime importance in meeting the region's future need for construction-quality aggregates.

²State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, *Well Finder*, <http://maps.conservation.ca.gov/doggr/#openModal>, February 2016.

³State of California Department of Conservation, Division of Oil, Gas and Geothermal Resources, *2014 Preliminary Report of California Oil and Gas Production Statistics*.

Attachment 4

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

DATE: March 27, 2025

TO: State Clearinghouse, Registrar-Recorder/County Clerk, Responsible Agencies, Trustee Agencies, Organizations and Interested Parties

SUBJECT: Notice of Preparation of an Environmental Impact Report in Compliance with Title 14, section 15082(a) of the California Code of Regulations

The County of Los Angeles (“County”) is the lead agency pursuant to the California Environmental Quality Act (“CEQA”) and intends to prepare an Environmental Impact Report (“EIR”) for the proposed project identified below. The County has prepared this Notice of Preparation (“NOP”) to provide Responsible Agencies and other interested parties with information describing the project and to identify its potential environmental effects pursuant to State requirements.

AGENCIES: The County requests your agency’s input on the scope and content of the environmental information relevant to your agency’s statutory responsibilities in connection with the proposed project, in accordance with Title 14, section 15082(b) of the California Code of Regulations. Your agency will need to use the EIR prepared by the County when considering any permits that your agency must issue, or other approval for the project.

ORGANIZATIONS AND INTERESTED PARTIES: The County requests your comments and concerns regarding the environmental issues associated with construction and operation of the proposed project.

PROJECT & PERMIT(S): Revised Oil Well Ordinance (ROWO), Project No. PRJ2025-000212, Ordinance RPPL2025000276, General Plan Amendment RPPL2025000277, Environmental Plan RPPL2025000284

PROJECT APPLICANT: County of Los Angeles Department of Regional Planning

PROJECT LOCATION: Unincorporated Los Angeles County (Countywide)

PROJECT DESCRIPTION: 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 County of Los Angeles General Plan in support of sustainability and environmental justice goals by phasing out oil production in unincorporated Los Angeles County.

- i. Amendments to Title 22 – Planning & Zoning: Under the proposed project, 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.
- ii. Amendments to the Baldwin Hills CSD: The project amends the Baldwin Hills CSD to align with and implement the provisions of the Title 22 amendments described above, ensuring consistent application of the new regulations and standards within the Baldwin Hills CSD.
- iii. Amendments to Title 12 – Environmental Protection: The project eliminates the current exemption for 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.
- iv. Amendments to the General Plan: 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.

POTENTIAL ENVIRONMENTAL EFFECTS OF THE PROJECT: Based on a preliminary review of the proposed project consistent with section 15060 of the CEQA Guidelines, the County has determined that an EIR should be prepared for this proposed project. In addition, consistent with section 15082 of the CEQA Guidelines, the County has identified the following probable environmental effects of the project, which will be addressed in the EIR for this project:

- Mineral Resources

The County has determined that there is not a likelihood of potentially significant effects related to the following environmental topics:

- Aesthetics
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Services Systems
- Wildfire
- Mandatory Findings of Significance

The County proposes that the EIR indicate the reasons why these effects were determined not to be significant and are therefore not addressed in detail in the EIR.

NOTICE OF SCOPING MEETING: The County will conduct a virtual public scoping meeting for the purpose of soliciting oral and written comments from interested parties as to the appropriate scope and content of the EIR.

All interested parties are invited to attend the meeting to assist in identifying issues to be addressed in the EIR. The meeting will include a brief presentation of the project to be addressed in the EIR and will provide attendees with an opportunity to provide input to the scope of the EIR. The meeting will be held online.

Thursday, April, 17, 2025
6:00 PM–7:00 PM (Pacific Time)—Via Zoom Meeting
Please use the following link to access the webinar: bit.ly/4hYN0WB

The meeting will include language access service in Spanish, Cantonese, and Mandarin. Translation in other languages can be made available at the meeting upon request. Please submit translation requests at least seven business days in advance of each scheduled meeting to ordinance@planning.lacounty.gov.

PUBLIC REVIEW PERIOD: The County has determined to make this NOP available for public review and comment pursuant to Title 14, Section 15082(b) of the California Code

of Regulations. The comment period for the NOP begins on March 27, 2025 and ends on April 26, 2025.

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the EIR.

Please direct all written comments to the following address:

Ken Warner
LA County Planning
Ordinance Studies Section
320 West Temple Street, Floor 13
Los Angeles, CA 90012
Tel: (213) 974-6432
ordinance@planning.lacounty.gov

All written responses will be included as Appendices in the Draft EIR and their contents considered in accordance with State and County environmental guidelines.

DOCUMENT AVAILABILITY: The NOP and Initial Study are available for public review during regular business hours at the LA County Planning address listed above and the following locations:

- 1340 W 106th St, Los Angeles, CA 90044
- 11949 Alondra Blvd, Norwalk, CA 90650
- 18801 Elaine Avenue, Artesia, CA 90701
- 150 E El Segundo Blvd, Los Angeles, CA 90061
- 9945 E Flower St, Bellflower, CA 90706
- 240 W Compton Blvd, Compton, CA 90220
- 4420 E Rose St, East Rancho Dominguez, CA 90221
- 7807 Compton Ave, Los Angeles, CA 90001
- 1900 E Firestone Blvd, Los Angeles, CA 90001
- 11940 Carson St, Hawaiian Gardens, CA 90716
- 12000 Garfield Ave, South Gate, CA 90280
- 4990 Clark Ave, Lakewood, CA 90712
- 12350 Imperial Hwy, Norwalk, CA 90650
- 6600 Del Amo Blvd, Lakewood, CA 90713
- 16254 Colorado Ave, Paramount, CA 90723
- 13800 La Mirada Blvd, La Mirada, CA 90638
- 3798 Martin Luther King Jr. Blvd, Lynwood, CA 90262
- 11543 Colima Road, Whittier, CA 90604
- 4035 Tweedy Blvd, South Gate, CA 90280
- 11737 Wilmington Ave, Los Angeles, CA 90059
- 4411 E Gage Ave, Bell, CA 90201

- 7110 S Garfield Ave, Bell Gardens, CA 90201
- 4025 E City Terrace Dr, Los Angeles, CA 90063
- 5218 Santa Ana St, Cudahy, CA 90201
- 4837 E 3rd St, Los Angeles, CA 90022
- 4264 E Whittier Blvd, Los Angeles, CA 90023
- 1060 S Greenwood Ave, Montebello, CA 90640
- 6518 Miles Ave, Huntington Park, CA 90255
- 8511 Duchess Drive, Whittier, CA 90606
- 4323 E Slauson Ave, Maywood, CA 90270
- 1550 W Beverly Blvd, Montebello, CA 90640
- 9001 Mines Ave, Pico Rivera, CA 90660
- 3965 Cesar E Chavez Ave, Los Angeles, CA 90063
- 7828 S Serapis Ave, Pico Rivera, CA 90660
- 8800 Valley Blvd, Rosemead, CA 91770
- 500 S Del Mar Ave, San Gabriel, CA 91776
- 20540 E Arrow Highway Suite K, Covina, CA 91724
- 208 N Harvard Ave, Claremont, CA 91711
- 21800 Copley Dr, Diamond Bar, CA 91765
- 1301 Buena Vista St, Duarte, CA 91010
- 3224 Tyler Ave, El Monte, CA 91731
- 16010 La Monde St, Hacienda Heights, CA 91745
- 15920 E Central Ave, La Puente, CA 91744
- 3640 D St, La Verne, CA 91750
- 22 W Live Oak Ave, Arcadia, CA 91007
- 4550 N Peck Rd, El Monte, CA 91732
- 1850 Nogales Street, Rowland Heights, CA 91748
- 145 N Walnut Ave, San Dimas, CA 91773
- 1430 North Central Avenue, South El Monte, CA 91733
- 840 N Puente Ave, La Puente, CA 91746
- 21155 La Puente Rd, Walnut, CA 91789
- 1601 W West Covina Pkwy, West Covina, CA 91790
- 14433 Crenshaw Blvd, Gardena, CA 90249
- 17906 S Avalon Blvd, Carson, CA 90746
- 625 N San Vicente Blvd, West Hollywood, CA 90069
- 5335 W 135th St, Hawthorne, CA 90250
- 1731 W Gardena Blvd, Gardena, CA 90247
- 4359 Lennox Blvd, Lennox, CA 90304
- 24200 Narbonne Ave, Lomita, CA 90717
- 1320 Highland Ave, Manhattan Beach, CA 90266
- 12700 Grevillea Ave, Hawthorne, CA 90250
- 550 Pier Ave, Hermosa Beach, CA 90254
- 14615 Burin Ave, Lawndale, CA 90260

- 33792 Crown Valley Rd, Acton, CA 93510
- 122 N Topanga Canyon Blvd, Topanga, CA 90290
- 4545 N Oakwood Ave, La Canada Flintridge, CA 91011
- 2809 Foothill Blvd, La Crescenta, CA 91214
- 16921 E Avenue O #A, Palmdale, CA 93591
- 601 W Lancaster Blvd, Lancaster, CA 93534
- 29901 Ladyface Court, Agoura Hills, CA 91301
- 35119 80th St East, Littlerock, CA 93543
- 27971 Sloan Canyon Rd, Castaic, CA 91384
- 5040 West Avenue M-2, Quartz Hill, CA 93536
- 217 N Maclay Ave, San Fernando, CA 91340
- 6934 Broadway Ave, Whittier, CA 90606
- 31220 Oak Crest Dr, Westlake Village, CA 91361
- 215 Sumner Ave, Avalon, CA 90704
- 151 E Carson St, Carson, CA 90745
- 4975 Overland Ave, Culver City, CA 90230
- 3854 W 54th St, Los Angeles, CA 90043
- 4181 Baldwin Park Blvd, Baldwin Park, CA 91706
- 25950 The Old Road, Stevenson Ranch, CA 91381
- 5939 Golden West Ave, Temple City, CA 91780

The public is also encouraged to visit LA County Planning's website to review the initial study at <https://planning.lacounty.gov/long-range-planning/revised-oil-well-ordinance/>.

Thank you for your participation in the environmental review of this project.

Attachment 5



LOS ANGELES CITY PLANNING COMMISSION

200 North Spring Street, Room 272, Los Angeles, California, 90012-4801, (213) 978-1300
www.planning.lacity.org

LETTER OF DETERMINATION

MAILING DATE: NOVEMBER 10, 2025

Case No.: ZA-2025-2976-ZAI-1A
CEQA: ENV-2025-3305-CE
Plan Area: Citywide

Council District: ALL

Location: Citywide

Applicant: City of Los Angeles

Appellants: 1. Warren E&P, Inc.; Warren Resources of California, Inc.; Warren Resources, Inc.
Representative: Ty Thompson, Warren Resources, Inc.

2. Matthew Wickersham, Alston & Bird LLP on behalf of E&B Natural Resources Management Corporation, Hillcrest Beverly Oil Corporation, E&B ENR I, LLC, and Elysium Natural Resources, LLC

At its meeting of **October 9, 2025**, the Los Angeles City Planning Commission took the actions below in conjunction with the following:

A Zoning Administrator's Interpretation (ZAI) applicable to oil/gas well operations in the City of Los Angeles, issued by the Chief Zoning Administrator on June 12, 2025, interpreting the meaning of "well maintenance" in the Los Angeles Municipal Code (LAMC), as activities triggering a "Rework Permit" from the California Geologic Energy Management Division and/or notification per South Coast Air Quality Management District Rule 1148.2 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.

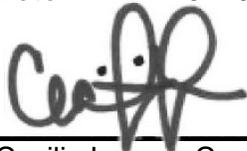
This ZAI provides an interpretation of existing terminology in the LAMC that assists in the procedural implementation of LAMC Sections 13.01-H and 13.01-I. The issuance of this ZAI that interprets "well maintenance" is not a "project", as defined by the CEQA Guidelines, and qualifies pursuant to CEQA Guidelines Section 15378 as an administrative and procedure-making activity to assist in the implementation of the City's preexisting Zoning Code provisions regarding oil well sites. Even assuming that the ZAI is considered a project, the ZAI is exempt under the Class 8 and common-sense exemptions, pursuant to CEQA Guidelines Sections 15308 and 15061(b)(3), respectively. The ZAI identifies the oil well activities that qualify as "well maintenance" in order to implement a review process intended to minimize land use impacts, such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, and truck traffic congestion, among others. Thus, the ZAI is an action taken by a regulatory agency, as authorized by local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment. Moreover, the ZAI only provides an interpretation of preexisting language in the Zoning Code to assist in the implementation of a previously established application process and does not have the potential for causing a significant effect on the environment.

1. **Determined** that the issuance of this ZAI that -interprets "well maintenance" is not a "Project" as that term is defined by CEQA Guidelines, Section 15378. Even if this ZAI is determined to be a Project for purposes of CEQA, it is exempt pursuant to CEQA Guidelines Section 15061(b)(3), because it can be seen with certainty that there is no possibility that the Project may have a significant effect on the environment; and determined that if the ZAI is a Project under CEQA it is exempt pursuant to CEQA Guidelines Section 15308 (Class 8) and that there is no substantial evidence demonstrating that an exception to an exemption pursuant to CEQA Guidelines Section 15300.2 applies;
2. **Denied** the appeals;
3. **Affirmed** the attached Zoning Administrator's Interpretation that interprets "well maintenance" dated June 12, 2025; and
4. **Adopted** the Staff Recommendation Report as the Commission's report.

The vote proceeded as follows:

Moved: Saitman
 Second: Rosenstein
 Ayes: Choe, Johnson, Lawshe
 Absent: Chavez, Diaz, Klein, Zamora

Vote: 5 – 0



Cecilia Lamas, Commission Executive Assistant II
 Los Angeles City Planning Commission

Fiscal Impact Statement: There is no General Fund impact as administrative costs are recovered through fees.

Effective Date/Appeals: The decision of the Los Angeles City Planning Commission is final effective upon the mailing of this determination letter and not further appealable.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

Attachments: Zoning Administrator's Interpretation that defines "well maintenance" dated June 12, 2025

cc: Estineh Mailian, Chief Zoning Administrator
 Matthew Lum, Senior City Planner
 Sarahi Ortega, City Planner

OFFICE OF ZONING ADMINISTRATION
200 N. SPRING STREET, ROOM 763
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CHRISTINA TOY LEE
JORDANN TURNER

**CITY OF LOS
ANGELES**
CALIFORNIA



KAREN BASS
MAYOR

**LOS ANGELES DEPARTMENT
OF CITY PLANNING**
EXECUTIVE OFFICES
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DEPUTY DIRECTOR
ARTHI L. VARMA, AICP
DEPUTY DIRECTOR
LISA M. WEBBER, AICP
DEPUTY DIRECTOR

planning.lacity.org

June 12, 2025

Public Counters

Department of City Planning

Department of Building and Safety

All Interested Parties

CASE NO. ZA-2025-2976-ZAI
ZONING ADMINISTRATOR'S
INTERPRETATION

CEQA: ENV-2025-3305-CE

RELATED CASES:
ZA-2022-8997-ZAI-1A,
ZA Memo No. 141,
ZA Memo No.133

LAMC Sections: 13.01-H, 13.01-I

"Well Maintenance"

CITYWIDE

This Zoning Administrator's Interpretation (ZAI) interprets what drill site activities qualify as "well maintenance". This ZAI (ZA-2025-2976-ZAI) replaces a previous ZAI (ZA-2022-8997-ZAI-1A) interpreting "Well Maintenance", dated October 4, 2023, and rescinded on May 29, 2025. **Well maintenance** for oil and gas extraction sites shall be interpreted as any scope of work that meets either of the following two criteria:

1. A scope of work that requires a Notice of Intention "Rework Permit" to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).¹
2. A scope of work that requires notification per the South Coast Air Quality Management District's (SCAQMD) Rule 1148.2 - "Notification and Reporting Requirements for Oil and Gas Well and Chemical Suppliers" for "Well Rework"

¹ Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills. California Energy Geologic Management Division, 2022. <https://www.conservation.ca.gov/calgem/for_operators>

and/or “Injection” including one or more of the following activities: acidizing, hydraulic fracturing, gravel packing, maintenance acidizing, matrix acidizing, and acid fracturing.²

AUTHORITY OF THE ZONING ADMINISTRATOR TO INTERPRET ZONING REGULATIONS

Section 13A.1.7.D.2 of Chapter 1A of the Los Angeles Municipal Code provides, in pertinent part, as follows:

“2.b. **Zoning Administrator Interpretation.** The Zoning Administrator shall have authority to interpret zoning regulations when the meaning of the regulation is not clear, either in general or as it applies to a specific property or situation.

CONTEXT

The Los Angeles Municipal Code (LAMC) contains several Zoning Code provisions that regulate oil and gas drill sites. These sites are primarily regulated by LAMC Section 13.01. LAMC Section 13.01-H of Chapter 1 states that any person desiring to “drill, deepen, or **maintain an oil well...**” requires a determination from the Zoning Administrator. The Zoning Code does not specify what activities might constitute a desire to “maintain an oil well.”

In the past several decades the Zoning Administrator has reviewed and determined when a proposed scope of work at a drill site qualifies as a well maintenance project on a case by case basis.

LAMC Section 13.01-H and Section 13.01-I, reads as follows (underline added):

*H. “**Drilling Site Requirements.** Any person desiring to drill, deepen or maintain an oil well in an oil drilling district that has been established by ordinance, or to drill or deepen and subsequently maintain an oil well in the M3 Zone within 500 feet of a more restrictive zone shall file an application in the Department of City Planning on a form provided by the Department, requesting a determination of the conditions under which the operations may be conducted.”*

*I. “**Permits.** (Amended by Ord. No. 173,268, Eff. 7/1/00, Oper. 7/1/00.) No person shall drill, deepen or maintain an oil well or convert an oil well from one class to the other and no permits shall be issued for that use, until a determination has been made by the Zoning Administrator or Area Planning Commission pursuant to the procedure prescribed in Subsection H of this section.”*

² Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

This ZAI formally interprets the term, **well maintenance**, as applicable in LAMC Sections 13.01-H and I. More specifically, this ZAI interprets the term “maintain” in the LAMC Sections 13.01-H and I. In the past, the Office of Zoning Administration (OZA) has been asked by operators, advocacy groups, and interested parties to interpret what constitutes well maintenance as it appears in the Zoning Code.

This ZAI formally interprets what the term, well maintenance, entails as needed for the land use regulation of drill sites set forth in LAMC Sections 13.01-H and 13.01-I.

BACKGROUND/ HISTORY

On December 2, 2022, the City Council approved Ordinance No. 187,709, which became effective on January 18, 2023, amending various parts of the LAMC relating to oil drilling. Among other changes, it eliminated LAMC Sections 13.01-H and 13.01-I and amended LAMC Section 12.23-C.4(a) to prohibit well maintenance, drilling, redrilling, and deepening except to prevent or respond to a threat to public health, safety, or the environment, as determined by the Zoning Administrator.

To implement the Ordinance, the Department of City Planning’s Office of Zoning Administration (OZA) issued a Zoning Administrator Interpretation (ZAI) defining “well maintenance” (Case No. ZA-2022-8997-ZAI), and a Zoning Administrator Memorandum No. 141 (ZA Memo 141), which set forth the procedures for applying for Health and Safety Exemptions under the Ordinance .

The Oil Ordinance was challenged by oil operators in four related lawsuits, with the lead case being Warren E&P, Inc. v. City of Los Angeles, LASC Case No. 23STCP00060.³ In addition, on January 30, 2023, an appeal was filed regarding the ZAI (Case No. ZA-2022-8997-ZAI-1A). On September 14, 2023, the City Planning Commission, as the appellate body, adopted a modified Zoning Administrator’s Interpretation (Case No. ZA-2022-8997-ZAI-1A), dated October 4, 2023.

On September 6, 2024, Los Angeles Superior Court Judge Curtis A. Kin found that the City’s Oil and Gas Drilling Ordinance (Ordinance No. 187,709), the ZAI (Case No. ZA-2022-8997-ZAI-1A), and ZA Memo No. 141 were preempted by state law.

Approximately three weeks later on September 25, 2024, Governor Newsom signed into law Assembly Bill (AB) 3233, which added Section 3106.1 to the Public Resources Code to provide local governments with authority to regulate oil and gas operations, notwithstanding other state law. AB 3233 became effective on January 1, 2025.

As part of the litigation and settlement, the City of Los Angeles rescinded the Oil Ordinance, finalized on June 2, 2025. The Office of Zoning Administration also issued a

³ "Warren E and P, Inc., et al. v. City of Los Angeles, et al." Council File No. 24-1466, LACityClerk Connect. <cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=24-1466>

rescission of the ZAI (Case No. ZA-2022-8997-ZAI-1A), and ZA Memo No. 141 on May 29, 2025. Upon the rescission of Ordinance No. 187,709, the amended or deleted definitions, paragraphs, subdivisions or subsections of Sections 12.03, 12.20, 12.23, 12.24, and 13.01 of Chapter 1 of the Los Angeles Municipal Code, return to the same language and effect as they had prior to their amendment or deletion by Ordinance No. 187,709.

Another notable state legislation which became effective on June 28, 2024, was Senate Bill (SB) 1137. The bill was signed by Governor Newsom on September 16, 2022, however, it was temporarily paused due to the legislation having qualified for a ballot initiative. After the ballot initiative was withdrawn, SB 1137 became effective on June 28, 2024. CalGEM resumed implementation of the new regulations, including a prohibition on new drilling, deepening, and rework (well maintenance) permits if the oil well is within 3,200-feet of a sensitive receptor. SB 1137 contains clear language that CalGEM can issue permits if the oil well activity is necessary to prevent or respond to a threat to public health, safety, or the environment. CalGEM is determining on a case-by-case basis if a scope of work meets the criteria for such a health and safety exception.

It is necessary to issue this new ZAI to interpret the term well maintenance in relation to the reinstated and reactivated sections of the LAMC noted above, specifically, as found in 13.01-H and 13.01-I.

DISCUSSION

The OZA relied on specific sources to interpret the scopes of work for well maintenance that include, but are not limited to: federal regulatory agency standards, state regulatory agency standards, scientific articles, and engineering publications related to petroleum engineering and oil extraction. The OZA also consulted with the City's Petroleum Administrator, Fire Department, SCAQMD, and CalGEM.

The OZA examined a growing body of research and studies regarding oil and gas wells. On June 21, 2024, the California Oil & Gas Public Health Rulemaking Scientific Advisory Panel, a group commissioned by the California Department of Conservation, published *Public Health Dimensions of Upstream Oil and Gas Development in California: Scientific Analysis and Synthesis to Inform Science-Policy Decision Making* that found adverse health outcomes increase within 1 kilometer (3,281 feet) of oil and gas wells for sensitive receptors (such as residences and child-care centers). These affected communities include low-income neighborhoods and communities of color. Also included and examined in the study was the scientific advisory panel's response (October 2021) to CalGEM regarding the effects of oil extraction and production on

public health, which illustrates the need to better regulate well maintenance activities.⁴ This scientific advisory panel, consisting of scientists, engineers, and public health analysts, determined that extraction activities may have negative external effects on the health and well-being of people within the vicinity of such operations. In another study published in April 2017, researchers examined the overlap of the type of chemicals and trade products used in hydraulic fracturing activities and routine maintenance acidizing projects. This 2017 study concluded that there is substantial overlap given the number of similar chemicals used during these activities.⁵ This analysis was done specifically using SCAQMD data, which is particularly relevant as this agency also regulates oil drill sites for air emissions and odors. These aforementioned studies confirm the potential negative external effects on community public health and on the environment, and serve as further justification for formally establishing the procedures for a discretionary review for well maintenance activities, consistent with the intent and objectives of Sections 13.01-H and 13.01-I.

In reviewing well maintenance projects, regulatory agencies such as CalGEM and SCAQMD have narrow purviews in what they can regulate. Therefore, the Zoning Administrator's authority under the local zoning code to review maintenance activities in a more comprehensive manner, can help further reduce, if necessary, any land use impacts. Specifically, as it relates to oil and gas extraction, CalGEM focuses on subsurface and near surface activities whereas SCAQMD regulates the effects on air quality, including emissions and pollutants. These agencies do not regulate other significant land use impacts for oil and gas extraction activities. Such land use impacts include, but are not limited to: traffic/transportation circulation, noise decibel levels, aesthetics, and noxious odors resulting from proposed activities conducted at drill sites.

CalGEM requires a state permit known as a "Notice of Intention" permit for specific oil well activities identified by CalGEM.⁶ With regards to SCAQMD's Rule 1148.2, that rule requires operators to submit notification to SCAQMD for specific oil well activities and also requires operators to mail notification to sensitive receptors (e.g. residences) within a 1,500-ft. radius of the oil well facility.⁷

Well maintenance activities, as described herein, may have negative land use impacts on surrounding communities such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, truck traffic congestion on local streets, removal of on-street parking, traffic congestion on

⁴ "Public Health Dimensions of Upstream Oil and Gas Development in California: Scientific Analysis and Synthesis to Inform Science-Policy Decision Making", California Oil & Gas Public Health Rulemaking Scientific Advisory Panel. Commissioned by the CA Department of Conservation. June 21, 2024 <https://www.conservation.ca.gov/calgem/Documents/Public%20Health%20Panel%20Final%20Report_20240621.pdf>

⁵ "Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development", Physicians, Scientists, and Engineers for Healthy Energy (funded by UC Berkeley and U.S. Department of Energy grants), Analyzes the usage of chemicals from South Coast AQMD disclosure data and concludes that there is overlap between fracking chemicals and 'maintenance acidizing' chemicals. April, 2017.

⁶ Well Permit Information portal, California Geologic Energy Management Division online website, July 2022, https://www.conservation.ca.gov/calgem/for_operators

⁷ Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

local streets, and lack of effective screening for drill site equipment. These are precisely the types of land use impacts that LAMC Sections 13.01-H and 13.01-I were meant to address to protect the health and safety of surrounding neighborhoods and the public. As such, the Zoning Administrator's interpretation and review of well maintenance activities is consistent with the intent of Sections 13.01-H and 13.01-I, and is meant to implement the pre-existing safeguards in those sections. The Zoning Administrator's interpretation and review of these activities allow for a more comprehensive analysis of proposed well maintenance activities and ability to mitigate any potential impacts, if necessary.

The Zoning Administrator's Interpretation establishes a definition that facilitates the implementation of LAMC Sections 13.01-H and 13.01-I, and further advances the City's goal to prioritize the safety and quality of livability for local residents while providing an opportunity for operators to keep wells functioning in a safe and compliant manner.

Overview of Oil and Gas Well Activities Considered as Well Maintenance

Regulatory standards from agencies, primarily CalGEM and SCAQMD, helped shape the decision to define what activities qualify as well maintenance. Per state regulations, when operators propose to conduct specific well maintenance activities (such as maintenance acidizing or a well recasing), operators are required to apply for a permit and/or submit notification to various regulatory agencies such as SCAQMD or CalGEM.

For example, when an operator wishes to conduct maintenance acidizing on a well, the operator must disclose a chemical use list to SCAQMD and the operator sends an electronic notification of the proposed work to SCAQMD. Members of the public can subscribe to receive these notifications when an operator plans to conduct the proposed maintenance acidizing project or any other project that requires notification pursuant to SCAQMD Rule 1148.2. In this example, under the authority of LAMC Section 13.01-H, and per this ZAI, the Zoning Administrator would review this request for maintenance acidizing because it requires online notification per SCAQMD's Rule 1148.2. As part of the discretionary review pursuant to LAMC Section 13.01-H, the Zoning Administrator could include conditions to minimize land use impacts to the local vicinity.

Implementation per LAMC Section 13.01-H:

ZA Memo 133, dated September 19, 2016, establishes a comprehensive set of procedures and policies for the acceptance and processing of oil drilling applications pursuant to LAMC Section 13.01-H. This Section requires any person (or operator/applicant) seeking to "drill, deepen, or maintain an oil well ... [to] file an application in the Department of City Planning...". ZA Memo 133 has been and will continue to be, unless updated, modified, or superseded by other procedures, the guiding document for operators (or applicants) seeking approvals pursuant to LAMC

Section 13.01-H. Operators (or applicants) are required to submit an application for a discretionary review that includes a public hearing, mailing notice, and additional review standards. Since 2016, when ZA Memo 133 was released, the OZA has been engaged in reviewing and determining scopes of work that qualify as maintenance and warrant a discretionary review. The ZA Memo 133, in conjunction with this ZAI and its interpretation of oil well maintenance activities, provide the procedures for implementing the preexisting review criteria set forth in Section 13.01-H.

The 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.

DETERMINATION

For the reasons set forth above, “**well maintenance**” is interpreted to include any scope of work that meets any of the following criteria:

1. A scope of work that requires a Notice of Intention “Rework Permit” to carry out a rework project on a well from the California Geologic Energy Management Division (CalGEM).⁸
2. A scope of work that requires notification per the South Coast Air Quality Management District’s (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.⁹

Well Servicing. Repair and servicing work may be carried out on existing wells if the scope of work does not meet the criteria for well maintenance, as described in this ZAI. Work activities conducted on the wells that do not meet the criteria for well maintenance shall be considered well servicing. Examples of well servicing can include projects such as well pump replacement or maintenance of underground and/or aboveground storage tanks that service the oil well operations.

This interpretation shall be published pursuant to the LAMC and administrative practice of the OZA.

⁸ Permitting, Forms, and Compliance - Oil and Gas Requirements and Forms, Well Permit Information, Rework/Redrills. California Energy Geologic Management Division, 2022. <https://www.conservation.ca.gov/calgem/for_operators>

⁹ Compliance - Oil and Gas Well Electronic Notification and Reporting (Rule 1148.2) - South Coast Air Quality Management District, 2022. <<https://www.aqmd.gov/home/rules-compliance/compliance/1148-2>>

CEQA

This ZAI provides a definition that assists in the procedural implementation of LAMC Sections 13.01-H and 13.01-I. The issuance of this ZAI that defines “well maintenance” is not a “project” as that term is defined by CEQA Guidelines, Section 15378 as it constitutes an administrative and procedure-making activity to assist in the implementation of the City’s preexisting Zoning Code provisions regarding oil well sites. Even assuming that the ZAI is considered a project, the ZAI is nevertheless exempt under the Class 8 and common sense exemptions. The ZAI provides a definition of oil well maintenance to implement a review process intended to minimize land use impacts, such as elevated noise levels, frequent odor events, increased emissions exposure, spill incidents affecting the public right-of-way, and truck traffic congestion, among others. Thus, the ZAI is an action taken by a regulatory agency, as authorized by local ordinance, to assure the maintenance, restoration, enhancement, or protection of the environment. Moreover, the ZAI only provides a definition and interpretation of preexisting language in the Zoning Code to assist in the implementation of a previously-established application process, and does not have the potential for causing a significant effect on the environment.

EFFECTIVE DATE

This determination will become effective after June 27, 2025, unless an appeal is filed with the Department of City Planning. An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment.

An appeal may be filed utilizing the following options:

Online Application System (OAS): The OAS (<https://planning.lacity.org/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning’s DSC, and submit fee payment by credit card or e-check.

Drop off at DSC. Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, and payment can be made by credit card or check. City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications; alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter.

Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

Forms are available online at <http://planning.lacity.org/development-services/forms>.
Public offices are located at:

Metro DSC	Van Nuys DSC
201 N. Figueroa Street Los Angeles, CA 90012 planning.figcounter@lacity.org (213)482-7077	6262 Van Nuys Boulevard Van Nuys, CA 91401 planning.mbc2@lacity.org (818) 374-5050
South LA DSC	West LA DSC
(In person appointments available on Tuesdays and Thursdays 8am-4pm only) 8475 S. Vermont Avenue 1st Floor Los Angeles, CA 90044 planning.southla@lacity.org	(CURRENTLY CLOSED) 1828 Sawtelle Boulevard West Los Angeles, CA 90025 planning.westla@lacity.org (310) 231-2901

		
<p>QR Code to Online Appeal Filing</p>	<p>QR Code to Forms for In-Person Appeal Filing</p>	<p>QR Code to BuildLA Appointment Portal for Condition Clearance</p>

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.



ESTINEH MAILIAN
Chief Zoning Administrator
EM:ML:SO:ecm