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CHAPTER 1 EXECUTIVE SUMMARY

1.1 INTRODUCTION

This Program Environmental Impact Report (EIR) has been prepared to address the potential environmental effects associated with the implementation of the proposed Revised Oil Well Ordinance (Project), a regulatory program initiated by the County of Los Angeles. In accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.), this EIR is an informational document intended to provide the public, and local and state governmental agency decision makers, with a comprehensive analysis of the Project's potential environmental consequences to support informed decision making.

The scope of this EIR is programmatic, evaluating the environmental effects of a new countywide regulatory framework that prohibits new oil wells and phases out existing oil and gas production. The analysis considers the full range of environmental topics outlined in the CEQA Guidelines, including short-term effects related to facility decommissioning and the long-term environmental outcomes of the policy change.

1.2 ENVIRONMENTAL PROCEDURES

This EIR has been prepared pursuant to CEQA to assess the environmental effects associated with the implementation of the Project. An EIR is the most comprehensive form of environmental documentation identified in CEQA and is intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts. The six main objectives of this document as established by CEQA are:

1. To disclose to decision makers and the public the significant environmental effects of proposed activities.
2. To identify ways to avoid or reduce environmental damage.
3. To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. To disclose to the public the reasons for agency approval of projects with significant environmental effects.
5. To foster interagency coordination in the review of projects.
6. To enhance public participation in the planning process.

An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Prior to approving a proposed project, the lead agency—in this case, the Los Angeles County Department of Regional

Planning—must consider the information contained in the EIR. The County of Los Angeles Board of Supervisors must first certify that the EIR was prepared in accordance with CEQA, that it has been reviewed and considered, and that it reflects the independent judgment of the County. If the Project is approved, the Board must also adopt findings concerning the Project's significant environmental impacts and alternatives. Because this EIR identifies a significant and unavoidable impact, the Board would also be required to adopt a Statement of Overriding Considerations, which explains the specific economic, legal, social, technological, or other benefits of the Project that outweigh its unavoidable adverse environmental effects.

1.2.1 EIR Organization

This EIR has been organized as described below:

Chapter 1. Executive Summary: Summarizes the background and description of the Project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the Project.

Chapter 2. Introduction: Describes the purpose of this EIR, background of the Project, the Notice of Preparation, the use of incorporation by reference, Mitigation Monitoring and Compliance Reporting, and Final EIR certification.

Chapter 3. Project Description: A detailed description of the project, the objectives of the Project, the Project Area and location, approvals anticipated to be included as part of the project, the necessary environmental clearances for the project, and the intended uses of this EIR.

Chapter 4. Environmental Setting: A description of the physical environmental conditions in the vicinity of the Project as they existed at the time the Notice of Preparation was published, from both a local and regional perspective. The environmental setting provides baseline physical conditions from which the lead agency determines the significance of environmental impacts resulting from the Project.

Chapter 5. Environmental Analysis: Provides, for each environmental parameter analyzed, a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the Project; the existing environmental setting; the potential adverse and beneficial effects of the Project; the level of impact significance before Project Design Features (PDFs) and existing regulations are applied; the PDFs integrated into the Project; the level of significance of the adverse impacts of the Project after PDFs are incorporated; and the potential cumulative impacts associated with the Project and other existing, approved, and proposed development in the area.

Chapter 6. Other CEQA Considerations: Describes the potential growth-inducing and significant unavoidable adverse impacts of the Project.

Chapter 7. Alternatives to the Project: Describes the impacts of the alternatives to the Project, including the No Project Alternative.

Chapter 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the Project that were determined not to be significant.

Chapter 9. Significant Cumulative Impacts: Describes the potential significant cumulative changes associated with the Project.

Chapter 10. Organizations and Persons Consulted: Lists the people and organizations that were contacted during the preparation of this EIR for the Project.

Chapter 11. Qualifications of Persons Preparing EIR: Lists the people who prepared this EIR for the Project.

Appendices. The appendices for this document contain the following supporting documents:

Appendix A: Existing Conditions Site Inventory
Appendix B: Comments Received During the Scoping Period
Appendix C: Notice of Preparation and Initial Study

1.2.2 Type and Purpose of this EIR

This document has been prepared to satisfy the requirements for a Program Environmental Impact Report. Although the legally required contents of a Program EIR are the same as those of a project-specific EIR, a Program EIR is used to analyze the environmental effects of a broad policy, plan, or a series of related actions. For the sake of clarity and readability, this document is referred to simply as the "EIR" throughout the remainder of the text. As provided in Section 15168 of the State CEQA Guidelines, a Program EIR is appropriate for a project consisting of rules, regulations, or plans that will govern the conduct of a continuing program, such as the countywide regulatory framework proposed by this Project.

Use of a Program EIR provides the County, as the Lead Agency, with the opportunity to consider broad policy alternatives and program-wide mitigation measures at a strategic level. It allows for a more comprehensive analysis of cumulative impacts and provides a framework for addressing recurring policy issues. The CEQA Guidelines (Section 15168[h]) cite five primary advantages of using a Program EIR:

- Provide a more exhaustive consideration of impacts and alternatives than would be practical in an individual, site-specific EIR.
- Focus on cumulative impacts that might be overlooked in a case-by-case analysis.
- Avoid continual reconsideration of recurring policy issues.
- Consider broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to implement them.
- Reduce paperwork by encouraging the reuse of data through a process known as "tiering."

Once a Program EIR has been certified, subsequent activities that are consistent with the program analyzed in the Program EIR can be approved with streamlined environmental review. If a subsequent activity falls within the scope of the Program EIR and its effects were adequately addressed, no new environmental document may be required. If a subsequent activity would have effects that were not examined in the Program EIR, the agency must prepare a more focused, project-specific environmental document, but that document can tier from the analysis in the Program EIR, incorporating its broader findings by reference.

It is important to note, however, that while this document is a Program EIR, its scope is intentionally limited. As further detailed in Chapter 3, Project Description, this EIR analyzes the environmental impacts of the regulatory program itself—namely, the prohibition of new wells and the decommissioning and restoration of existing well sites. It does not analyze the project-specific impacts of any potential future development that may be proposed on these sites after restoration is complete. Analyzing the impacts of unknown future development would be speculative. Therefore, this Program EIR is not intended to be used as a first-tier document for the purpose of tiering the environmental review of subsequent land use development projects on restored sites. Any future development proposals will be subject to a separate, project-specific environmental review pursuant to CEQA at the time they are submitted to the County.

1.3 PROJECT LOCATION

The Project consists of regulatory changes that apply to a vast and diverse geographic area. The Project is not a site-specific development but a countywide regulatory framework. The key components of the Project and their respective areas of applicability are described below. (Detailed maps are provided in Chapter 3, Project Description.)

- Countywide Applicability: The proposed amendments to the Los Angeles County Code will apply to all unincorporated areas of Los Angeles County, except for those lands located within the California Coastal Zone. The unincorporated areas total approximately 2,656 square miles and include a wide spectrum of landscapes, including dense urban neighborhoods, suburban and rural communities, agricultural lands, and sensitive natural habitats in mountain and desert regions.
- Baldwin Hills Community Standards District (CSD): A primary component of the Project involves targeted amendments to the Baldwin Hills CSD. This is an existing regulatory overlay district established to provide specific operational controls for oil and gas activities within the Inglewood Oil Field, one of the largest urban oil fields in the United States. The CSD is in the west-central portion of Los Angeles County, bordered by urban communities and the Kenneth Hahn State Recreation Area.
- Newhall Ranch Specific Plan: The Project also includes amendments to the Newhall Ranch Specific Plan. This large-scale master-planned community is in the northwestern portion of Los Angeles County in the Santa Clarita Valley. The amendments are designed to align the Specific Plan with the new countywide regulations by phasing out existing oil extraction activities within its boundaries and prohibiting new oil and gas wells.

1.4 PROJECT SUMMARY

The Project is a comprehensive regulatory program designed to prohibit new oil and gas production and phase out all existing oil and gas operations in the unincorporated areas of Los Angeles County. The fundamental purpose of the Project is to provide maximum protection for public health, safety, and the environment. Project objectives include prioritizing environmental justice, enhancing overall environmental quality, preventing new health and safety risks, ensuring the safe and orderly decommissioning of existing facilities, and promoting compatible land use on restored sites.

The Project consists of several interrelated discretionary actions, which are analyzed in this EIR as the "whole of the action." The primary components are identified by their County case numbers as follows:

- **Advanced Planning Case No. RPPL2025000276:** This is the core of the Project. It consists of an ordinance that amends Title 12 (Environmental Protection) and Title 22 (Planning and Zoning) of the Los Angeles County Code. The key provisions of this ordinance will (except in the Coastal Zone):
    - Prohibit the establishment of any new oil or gas wells or associated production facilities in all zones.
    - Deem all existing, legally established oil wells and production facilities to be nonconforming uses.
    - Require the termination of all nonconforming oil and gas operations following a 20-year amortization period.
    - Mandate the physical decommissioning and baseline remediation/restoration of all sites upon cessation of operations.
    - Establish performance standards for site maintenance, decommissioning, and restoration.
    - Amend the Baldwin Hills Community Standards District (CSD) to ensure its regulations are consistent with the countywide requirements.
    - Remove the exemption for oil and gas operations from the County's Noise Ordinance in Title 12.
- **General Plan Amendment No. RPPL2025000277:** The Project includes a General Plan Amendment to ensure consistency between the ordinance and the County's primary land use policy document, the General Plan. This amendment will revise the Land Use, Conservation and Natural Resources, and Safety Elements to remove policies that support oil production and to add new policies that formalize the prohibition and phase-out of oil and gas operations.
- **Specific Plan Amendment No. RPPL2025002394:** The Project will update the Newhall Ranch Specific Plan to maintain consistency with countywide oil and gas regulations. This amendment ensures that the prohibition on new wells and the requirements for phasing out existing operations are integrated into the land use plan for this large master-planned community.
- **Environmental Plan No. RPPL2025000284:** This is the case number for this Environmental Impact Report (EIR).

1.5 SUMMARY OF PROJECT ALTERNATIVES

CEQA requires an EIR to describe and evaluate a reasonable range of alternatives to the Project that could feasibly attain most of the basic project objectives but would avoid or substantially

lessen any of the project's significant effects. The only significant and unavoidable impact identified for the Project is the loss of availability of a known mineral resource (oil and gas). The following alternatives were analyzed in this EIR to determine if they could reduce this impact while still meeting the Project's fundamental purpose. A detailed analysis of these alternatives is provided in Chapter 7 of this EIR.

1.5.1 Alternatives Considered

Alternative 1: No Project Alternative

As required by CEQA, this alternative analyzes what would reasonably be expected to occur if the Project were not approved. The existing County regulations governing oil and gas operations would remain in place. New wells could be established where currently permitted, and existing operations could continue indefinitely. This alternative would not meet any of the Project's public health and environmental objectives. It would avoid the significant impact to mineral resources but would forgo all of the Project's long-term environmental benefits.

Alternative 2: Extended Amortization Period Alternative (30 Years)

This alternative is similar to the Project but would extend the amortization period for existing nonconforming wells from 20 to 30 years. The prohibition on new wells would still apply. This alternative is designed to lessen the economic impact on operators but would delay the full achievement of the Project's public health and environmental objectives by an additional decade. It would ultimately have the same significant impact on mineral resources.

Alternative 3: Geographic Limitation Alternative (Health and Safety Setback)

This alternative would prohibit new wells and phase out existing wells only within a 3,200-foot buffer of sensitive land uses (e.g., residences, schools, parks). Operations outside these setback zones could continue indefinitely. This alternative would lessen the impact on mineral resources but would only partially meet the Project's objectives, as it would not provide health and environmental protection on a countywide basis.

Alternative 4: Enhanced Performance Standards Alternative (No Phase-Out)

This alternative would not phase out existing operations. Instead, it would impose significantly more stringent performance standards on all oil and gas operations, such as mandatory electrification and continuous fenceline air monitoring. This alternative would avoid the impact to mineral resources but would fail to meet the core Project objectives of resolving land use conflicts for the maximum protection of public health and safety.

1.5.2 Environmentally Superior Alternative

CEQA requires the identification of an environmentally superior alternative. With respect to the specific issue areas of mineral resources, the No Project Alternative is considered environmentally superior, as it would avoid the significant unavoidable impacts to those resources.

However, CEQA also requires that if the No Project Alternative is identified as environmentally superior, the EIR must also identify an environmentally superior alternative from among the other "action" alternatives. Among the action alternatives, the Geographic Limitation Alternative (Alternative 3) is identified as the Environmentally Superior Alternative. While this alternative does not provide the same level of countywide health and environmental protection as the Project, it avoids the Project's most significant unavoidable impacts on mineral resources while still achieving the primary Project objective of protecting the most vulnerable communities from the impacts of oil and gas operations. It strikes a balance between achieving core project objectives and minimizing significant environmental effects.

1.6 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR contain issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. Regarding the Project, the major issues to be resolved by the Los Angeles County Board of Supervisors include decisions as to:

1. **Certification of the Final Program EIR:** Whether this Program EIR, and the Final Program EIR to be prepared, adequately describe the environmental impacts of the Project and have been completed in full compliance with CEQA.
2. **Adoption of a Statement of Overriding Considerations:** Whether the Project's significant public health, safety, and environmental benefits override its significant and unavoidable impact on the loss of availability of mineral resources.
3. **Approval of the Land Use Policy:** Whether to approve the Project's fundamental land use policy of declaring existing oil and gas operations a nonconforming use subject to termination, thereby resolving long-standing land use conflicts in favor of protecting public health and sensitive receptors.
4. **Adoption of the Ordinance and its Components:** Whether the specific components of the proposed regulatory program—including the ordinance, General Plan Amendment, and Specific Plan Amendment—should be adopted as proposed or modified.
5. **Sufficiency of Project Design Features:** Whether the Project's integrated Project Design Features (PDFs) and compliance with existing regulations are sufficient to ensure all temporary, short-term impacts from decommissioning activities remain less than significant.
6. **Selection of an Alternative:** Whether to approve the Project or one of the alternatives evaluated in the EIR that would substantially lessen the Project's significant impact while still achieving most of the basic Project objectives.

1.7 AREAS OF CONTROVERSY

CEQA requires an EIR to identify areas of controversy known to the Lead Agency. The County identified key issues through the public scoping process, which included the circulation of a Notice of Preparation (NOP) and a public scoping meeting.

Prior to the preparation of this EIR, the County issued an NOP in accordance with Section 15082 of the CEQA Guidelines for a 30-day public review period. Numerous written comment letters were received in response to the NOP (provided in Appendix B). In addition, the County held a virtual Scoping Meeting on April 17, 2025 to receive verbal comments from the public and agencies. Information regarding the meeting was made available through the County's website at https://planning.lacounty.gov/long-range-planning/revised-oil-well-ordinance/. A summary of the NOP comment letters is provided in Table 2-1, Summary of Scoping Comments Received in Chapter 2, Introduction.

Based on the scoping process, the following primary areas of controversy and concern were raised by agencies, organizations, and members of the public:

- Socioeconomic Effects: Concerns regarding the potential economic effects of phasing out oil and gas operations, including the displacement of skilled workers, effects on the local property tax base, and the financial burden of decommissioning on operators.
- Mineral and Energy Resources: The fundamental conflict between the Project's public health objectives and the continued extraction of a valuable energy resource, including effects on local energy supply and mineral rights holders.
- Air Quality and Greenhouse Gas Emissions: A key area of controversy involves the Project's net effect on regional and global emissions. Some stakeholders raised concerns that phasing out local production would increase reliance on imported oil, potentially increasing the global carbon footprint of the fuel supply (a phenomenon known as "carbon leakage") and exacerbating air quality impacts in communities near the Ports of Los Angeles and Long Beach. Conversely, other commenters argued that the permanent elimination of local operational and fugitive emissions, particularly methane, would result in a significant net benefit for local air quality and a reduction in overall greenhouse emissions.
- Amortization Period: The appropriateness of the 20-year amortization period, with some stakeholders advocating for a much shorter timeline to accelerate public health benefits, and others advocating for a longer period to reduce economic disruption.
- Land Use and Property Rights: Legal and policy questions regarding the Project's designation of a legally established land use as nonconforming, the County's authority to regulate land use for public health and safety purposes, and the potential future reuse of existing oil and gas sites

1.8 SUMMARY OF ENVIRONMENTAL IMPACTS AND LEVELS OF SIGNIFICANCE

This EIR provides a detailed analysis of the Project's potential environmental impacts across all environmental issue areas identified in the CEQA Guidelines. The analysis concludes that the Project would result in either less-than-significant impacts or beneficial impacts for all environmental topics, with the sole exception of Mineral Resources.

For all topics with potential short-term adverse impacts (e.g., air quality, noise, biological resources), impacts were found to be less than significant without the need for additional mitigation measures beyond compliance with existing regulations and the Project's own integrated Project Design Features (PDFs). These include mandates for Site and Well Identification (PDF-AE-1),

Ongoing Site Maintenance (PDF-AE-2), Lighting Standards (PDF-AE-3), Financial Assurance (PDF-HAZ-1), Community Health, Safety, and Notification Plans (PDF-HAZ-2), Decommissioning and Site Restoration (PDF-LU-1), Infrastructure Removal (PDF-LU-2), the Title 12 Noise Ordinance Amendment (PDF-NOI-1), Public Complaint and Response Logs (PDF-PS-1), and pre-disturbance Cultural Assessments (PDF-TCR-1). To ensure rigorous oversight and transparency, the enforcement of these mandatory PDFs will be tracked via a Compliance Monitoring Plan adopted alongside the Project.

Table 1-1 provides a summary of the environmental impacts and their levels of significance for each issue area analyzed in Chapter 5.

TABLE 1-1: Summary of Environmental Impacts

Environmental Issue Area	Threshold	Impact	Significance Determination	Summary of Findings
Aesthetics	AE-1 Have a substantial adverse effect on a scenic vista.	5.1-1	Less than Significant	Long-term beneficial; removes existing view obstructions. Prohibits new wells; requires decommissioning and site restoration.
	AE-2 Be visible from or obstruct views from a regional riding, hiking, or multi-use trail.	5.1-2	Less than Significant	Improves views from trails by removing industrial features. Requires removal and restoration of existing facilities visible from trails.
	AE-3 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	5.1-3	Less than Significant	No damage to scenic resources; potential for improved views. No new construction; removal of existing oil infrastructure.

	AE-4 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	5.1-4	Less than Significant	Improves visual character; supports zoning compliance. Phases out nonconforming uses; requires site restoration guided by mandatory Ongoing Site Maintenance (PDF-AE-2).
	AE-5 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	5.1-5	Less than Significant	No new light or glare; reduces existing sources. Removes oil facilities and lighting; controls temporary lighting during decommissioning through strict Lighting Standards (PDF-AE-3).
Agriculture and Forestry Resources	AF-1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the FMMP maps, to non-agricultural use.	5.2-1	No Impact	Does not convert designated Farmland to non-agricultural use. Regulatory action only; prohibits new wells and removes existing incompatible infrastructure.

	AF-2 Conflict with existing zoning for agricultural use or a Williamson Act contract.	5.2-2	No Impact	No conflict with agricultural zoning or Williamson Act contracts. Does not rezone land; removes incompatible industrial uses from agricultural zones.
	AF-3 Conflict with existing zoning for, or cause rezoning of, forest land or timberland.	5.2-3	No Impact	No conflict with forest or timberland zoning. Does not change zoning; no affected lands are zoned for forestry.
	AF-4 Result in the loss of forest land or conversion of forest land to non-forest use.	5.2-4	No Impact	No loss or conversion of forest land. Regulatory action only; does not authorize land clearing, grading, or development
	AF-5 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use.	5.2-5	No Impact	Does not indirectly cause conversion of Farmland or forest land. Introduces no new development pressure; removes existing incompatible industrial uses.
Air Quality	AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.	5.3-1	Less than Significant	No conflict; the project supports the goals of regional air quality plans by reducing overall emissions. Prohibits new emission sources and requires the phase-out of existing oil operations, thereby reducing

				pollutants like ROG/VOCs and NOx.
	AQ-2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	5.3-2	Less than Significant	No cumulatively considerable increase; results in a long-term net decrease in criteria pollutants. Generates only minor, temporary, and dispersed emissions during decommissioning, while permanently eliminating emissions from oil production.
	AQ-3 Expose sensitive receptors to substantial pollutant concentrations.	5.3-3	Less than Significant	No substantial exposure of sensitive receptors; long-term exposure risk to pollutants is reduced. Decommissioning emissions are temporary and minor, while the project removes existing sources of toxic air contaminants (TACs) near communities.
	AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	5.3-4	Less than Significant	No significant adverse odor impacts; long-standing, recurring odor sources will be eliminated. Removes existing odor-producing oil operations. Any temporary odors from decommissioning are minimal, short-lived, and regulated.

Biological Resources	B-1 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	5.4-1	Less than Significant	No substantial adverse effect; provides a long-term net benefit for special-status species. Reduces chronic industrial disturbance and facilitates habitat restoration upon decommissioning.
	B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	5.4-2	Less than Significant	No substantial adverse effect; long-term ecological benefit. Removes sources of physical disturbance and contamination, creating opportunities for native community recovery.
	B-3 Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling,	5.4-3	Less than Significant	No substantial adverse effect; improves long-term wetland health. Eliminates sources of hydrological and ecological disturbance. Future activities are

	hydrological interruption, or other means.			subject to state/federal wetland regulations.
	B-4 Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).	5.4-4	Less than Significant	No conversion of oak woodlands; creates opportunities for habitat restoration. Future decommissioning must comply with the County's Oak Tree Permit Ordinance. The project removes industrial uses that conflict with woodland preservation.
	B-5 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	5.4-5	Less than Significant	No substantial interference; long-term improvement for habitat connectivity. Removes infrastructure like fences and roads that currently act as barriers to wildlife movement.
	B-6 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	5.4-6	Less than Significant	Supports and aligns with local biological protection ordinances (e.g., SEA, Oak Tree). Phases out nonconforming uses. Future activities remain

				subject to existing County regulations.
	B-7 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	5.4-7	No Impact	No conflict with any adopted HCP or NCCP. Does not authorize development or substantially alter land use within any conservation plan area.
Cultural Resources	CR-1 Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.	5.5-1	Less than Significant	No substantial adverse change to historical resources. The project does not authorize the alteration of known resources; future decommissioning activities are subject to existing County, state, and federal regulations.
	CR-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	5.5-2	Less than Significant	No substantial adverse change to archaeological resources. Future ground disturbance is subject to standard County and CEQA protocols for inadvertent discoveries.
	CR-3 Disturb any human remains, including those interred outside of dedicated cemeteries.	5.5-3	Less than Significant	No significant disturbance of human remains. Inadvertent discoveries are subject to mandatory state legal protocols, including work stoppage and consultation with the County Coroner and the

				Native American Heritage Commission (NAHC).
Energy	E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction and operation.	5.6-1	Less than Significant	The project's net effect is a long-term reduction in energy consumption. The temporary energy needed for decommissioning is regulated for efficiency. This short-term use is outweighed by the permanent elimination of energy-intensive oil operations.
	E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	5.6-2	No Impact	The project directly implements and is consistent with state and local plans for renewable energy and energy efficiency. It is a key action for achieving the goals of the County's 2045 Climate Action Plan and OurCounty Sustainability Plan. It also aligns with state decarbonization goals like SB 100 and AB 1279 by phasing out local fossil fuel production.
Geology and Soils	GEO-1(a) Expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault, as delineated on the most recent Alquist-	5.7-1(i)	Less than Significant	No substantial adverse effects from fault rupture. The project does not build new structures for human occupancy; any future development is subject to separate review and mandatory compliance

	Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.			with the Alquist-Priolo Act.
	GEO-1(b) Expose people or structures to potential substantial adverse effects involving strong seismic ground shaking.	5.7-1(ii)	Less than Significant	No substantial adverse effects from ground shaking. Removes older infrastructure, reducing overall risk; any future development must comply with the California Building Code's seismic design standards.
	GEO-1(c) Expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction.	5.7-1(iii)	Less than Significant	No substantial adverse effects from liquefaction. Removes existing infrastructure from hazard zones; any future development would require mandatory geotechnical investigations and engineering solutions.
	GEO-1(d) Expose people or structures to potential substantial adverse effects involving landslides	5.7-1(iv)	Less than Significant	No substantial adverse effects from landslides. Decommissioning activities are required to be engineered for stability, ensured by existing regulations.
	GEO-2 Result in substantial soil erosion or the loss of topsoil.	5.7-2	Less than Significant	No substantial soil erosion or topsoil loss. Mandatory compliance with County grading permits and state

				stormwater (SWPPP) requirements.
	GEO-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	5.7-3	Less than Significant	No substantial adverse effects from unstable soils. The project removes infrastructure from sensitive areas and stops fluid withdrawal, which can contribute to subsidence.
	GEO-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code, creating substantial direct or indirect risks to life or property.	5.7-4	Less than Significant	No substantial risks from expansive soil. The project does not construct new buildings; any future development must comply with the mandatory engineering requirements of the building code to address expansive soils.
	GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.	5.7-5	No Impact	The project does not generate wastewater or propose the use of septic systems.

	GEO-6 Conflict with the Hillside Management Area (HMA) Ordinance (LA County Code, Title 22, Chapter 22.104).	5.7-6	Less than Significant	The project does not involve new development regulated by the ordinance; decommissioning is consistent with HMA goals.
Greenhouse Gas (GHG) Emissions	GHG-1 Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.	5.8-1	Less than Significant	No significant effect; results in a substantial long-term net reduction of GHG emissions. Temporary decommissioning emissions are minor and are outweighed by the permanent elimination of operational GHG sources, including fugitive methane and combustion emissions.
	GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.	5.8-2	No Impact	No conflict; the project directly implements and is consistent with applicable state and local GHG reduction plans. It is a key action for achieving the goals of the County's 2045 Climate Action Plan (Measure ES-1) and aligns with the state's CARB Scoping Plan, which calls for a managed decline of in-state oil production
Hazards and Hazardous Materials	HAZ-1 Create a significant hazard to the public or the environment through	5.9-1	Less than Significant	No significant hazard; the project permanently eliminates the routine transport and use of

	the routine transport, use, or disposal of hazardous materials.			hazardous materials associated with oil production. Replaces long-term operational hazards with a temporary, one-time cleanup and disposal process that is strictly governed by existing regulations. Furthermore, Financial Assurance (PDF-HAZ-1) ensures operators have the bonded capital required to safely execute this cleanup and disposal process.
	HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	5.9-2	Less than Significant	No significant hazard; the project eliminates the long-term risk of major operational accidents like well blowouts and pipeline ruptures. Replaces permanent, high-consequence operational risks with temporary, managed risks during decommissioning, which are governed by safety regulations and a mandatory Community Health, Safety, and Notification Plan (PDF-HAZ-2).
	HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter	5.9-3	Less than Significant	No significant hazard; the project permanently removes existing operational hazards from the vicinity of schools. Replaces permanent risks near schools with a

	mile of an existing or proposed school.			temporary, highly managed cleanup process governed by a mandatory, site-specific Community Health, Safety, and Notification Plan (PDF-HAZ-2).
	HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.	5.9-4	No Impact	The Project area includes known hazardous materials sites; however, the Project does not authorize new development on these sites. Instead, it legally mandates their decommissioning and site restoration, which will be subject to mandatory compliance with existing state and local remediation regulations under the oversight of the DTSC, RWQCB, and County Fire Department. Therefore, it does not create a significant hazard.
	HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or	5.9-5	Less than Significant	No airport safety hazard. Temporary, ground-level decommissioning activities do not create flight obstructions or other airport-related hazards.

	working in the Project Area.			
	HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	5.9-6	Less than Significant	No interference with emergency plans; provides a long-term beneficial effect. Temporary traffic is managed to maintain emergency access, while the project permanently removes industrial sites that could otherwise require a major hazardous materials emergency response.
Hydrology and Water Quality	HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.	5.10-1	Less than Significant	No violation of water quality standards; provides a long-term beneficial impact by removing contamination sources. Replaces permanent contamination risks with a temporary, managed cleanup process governed by existing state and federal regulations.
	HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater	5.10-2	Less than Significant	No decrease in groundwater supplies; protects long-term groundwater quality. Water use is temporary and minimal; the project mandates proper well plugging to protect aquifers and removes impervious surfaces,

	management of the basin.			which can slightly improve recharge.
	HYD-3(a) Substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site.	5.10-3(i)	Less than Significant	No adverse alteration of drainage; provides a long-term beneficial impact by restoring more natural hydrology. Removes impervious surfaces, reducing runoff; temporary erosion is managed by existing regulations.
	HYD-3(b) Substantially alter the existing drainage pattern of the site or area in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	5.10-3(ii)	Less than Significant	No substantial erosion or siltation. Temporary erosion risks during decommissioning are managed by mandatory compliance with the County Grading Code and state SWPPP requirements.
	HYD-3(c) Substantially alter the existing drainage pattern of the site or area in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional	5.10-3(iii)	Less than Significant	Does not increase runoff or exceed system capacity; provides a long-term beneficial impact. The project removes impervious surfaces like concrete pads and access roads, which will decrease, not increase, the long-term rate and volume of surface runoff compared to the existing condition.

	sources of polluted runoff.			
	HYD-3(d) Substantially alter the existing drainage pattern of the site or area in a manner which would Impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding.	5.10-3(iv)	Less than Significant	Does not impede or redirect flood flows; provides a long-term beneficial impact. The project requires the permanent removal of all industrial infrastructure, including wells and tanks, from 100-year floodplains, which improves the floodplain's natural capacity by removing obstructions.
	HYD-4 Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.	5.10-4	Less than Significant	No permanent structures placed in floodplains. The project removes existing industrial infrastructure from 100-year flood hazard areas.
	HYD-5 Conflict with the Los Angeles County Low Impact Development (LID) Ordinance (LA	5.10-5	No Impact	Decommissioning activities are not considered new development or redevelopment and are

	County Code, Title 12, Chapter 12.84).			therefore not subject to the LID Ordinance.
	HYD-6 Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).	5.10-6	No Impact	The project does not generate wastewater or propose the use of septic systems.
	HYD-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.	5.10-7	Less than Significant	No significant risk of pollutant release; provides a long-term beneficial impact. The project permanently removes oil and gas infrastructure from flood, tsunami, seiche, and mudflow hazard zones, eliminating the risk of pollutant release due to inundation.
	HYD-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	5.10-8	Less than Significant	The project supports the goals of water quality and groundwater management plans. Removes sources of industrial pollution, aiding regional water quality goals, and mandates proper well plugging to protect groundwater aquifers.

Land Use and Planning	LU-1 Physically divide an established community.	5.11-1	No Impact	Provides a beneficial effect on community cohesion. The project is a regulatory action that does not build physical barriers; instead, it facilitates the removal of existing industrial sites that currently function as barriers.
	LU-2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	5.11-2	Less than Significant	The project's primary purpose is to resolve existing policy inconsistencies within the County's planning framework. The project itself includes a General Plan Amendment, a Specific Plan Amendment, and an Ordinance to ensure internal consistency and directly implements the County's adopted climate and sustainability plans.
	LU-3 Conflict with any applicable habitat conservation plan or natural community conservation plan.	5.11-3	No Impact	The project is consistent with the conservation goals of such plans. The project does not authorize new development; the removal of incompatible industrial infrastructure supports habitat conservation goals by reducing fragmentation and other industrial impacts.

Mineral Resources	M-1 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.	5.12-1	Significant and Unavoidable	The project's core purpose is to prohibit and phase out oil extraction, which directly and permanently causes the loss of availability of remaining oil and gas reserves.
	M-2 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.	5.12-2	Significant and Unavoidable	The project includes a General Plan Amendment to remove the official "Mineral Resources" land use designation from delineated oil fields, causing the loss of availability at these locally important sites.
Noise	NOI-1 Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies.	5.13-1	Less than Significant	No substantial noise increase; provides a long-term beneficial reduction in ambient noise. Temporary decommissioning noise is controlled by mandatory compliance with the County Noise Ordinance and Project Design Feature (PDF-NOI-1); the project permanently eliminates industrial operational noise.
	NOI-2 Result in generation of excessive groundborne	5.13-2	Less than Significant	No excessive groundborne vibration. Any temporary vibration from decommissioning is

	vibration or groundborne noise levels.			required to comply with the County's strict, enforceable perception threshold standard in the Noise Ordinance (PDF-NOI-1).
	NOI-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.	5.13-3	No Impact	The project does not introduce new permanent sensitive receptors (e.g., homes, schools) into airport noise zones.
Population and Housing	POP-1 Induce substantial population growth in an area, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure).	5.14-1	No Impact	The project is a regulatory action; it does not build housing, create new permanent jobs, or extend growth-inducing infrastructure.
	POP-2 Displace substantial numbers of existing housing, necessitating the construction of	5.14-2	No Impact	The project does not involve the demolition of any housing units.

	replacement housing elsewhere, or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.			
Public Services	PS-1 Impact fire protection services.	5.15-1	Less than Significant	No significant impact; provides a long-term beneficial reduction in specialized service demand. The temporary demand during decommissioning is minor. The project permanently eliminates high-risk industrial sites that require specialized fire and hazardous materials (HazMat) response.
	PS-2 Impact police protection services.	5.15-2	Less than Significant	No significant impact; provides a long-term beneficial reduction in service demand. The temporary demand during decommissioning is minor. The project permanently eliminates the need for industrial site security and emergency management response. Additionally, the mandate for a Public Complaint and Response Log (PDF-PS-1) ensures local nuisance issues are tracked and addressed by the operator, reducing the

				burden on local law enforcement.
	PS-3 Impact public schools.	5.15-3	No Impact	The project does not induce population growth and therefore generates no new students or demand for school facilities.
	PS-4 Impact parks.	5.15-4	No Impact	The project does not induce population growth and therefore generates no new demand for park facilities.
	PS-5 Impact other public facilities, such as libraries.	5.15-5	No Impact	The project does not induce population growth and therefore generates no new demand for libraries or other population-based facilities.
Recreation	R-1 Would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	5.16-1	No Impact	The project does not induce population growth and therefore generates no new park users.
	R-2 Includes recreational facilities or requires the construction or expansion of	5.16-2	No Impact	The project does not induce population growth and therefore generates no new demand for parks.

	recreational facilities which might have an adverse physical effect on the environment.			
	R-3 Interfere with regional trail connectivity.	5.16-3	No Impact	Provides a long-term beneficial impact on trail connectivity. The project does not construct new barriers; the removal of existing industrial infrastructure eliminates obstacles and may create opportunities for new trail connections.
Transportation	T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	5.17-1	Less than Significant	The project's permanent net reduction in Vehicle Miles Traveled (VMT) aligns with regional and local goals; temporary truck traffic is managed by existing goods movement policies.
	T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	5.17-2	Less than Significant	The temporary VMT increase from decommissioning is not substantial because it is temporary, dispersed, and phased over a long period; this is outweighed by the permanent elimination of operational VMT.
	T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous	5.17-3	Less than Significant	The project does not create new hazardous roadway designs; it permanently removes industrial truck traffic from

	intersections) or incompatible uses (e.g., farm equipment).			local streets, and temporary haul truck traffic is managed through mandatory compliance with existing safety regulations.
	T-4 Result in inadequate emergency access.	5.17-4	Less than Significant	The project does not create permanent barriers; temporary activities are required to maintain emergency access at all times through compliance with the County Fire Code.
Tribal Cultural Resources	TCR-1(a) Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k).	5.18-1(i)	Less than Significant	No substantial adverse change to a listed or eligible Tribal Cultural Resource (TCR). The project requires mandatory compliance with PDF-TCR-1 (Cultural Assessment), which ensures that cultural resources are proactively identified and protected prior to ground disturbance.
	TCR-1(b) Cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria set forth in	5.18-1(ii)	Less than Significant	No substantial adverse change to a lead agency-determined significant TCR. The mandatory implementation of PDF-TCR-1 (Cultural Assessment) ensures that site-specific cultural surveys are conducted prior to decommissioning, preventing the

	Public Resources Code § 5024.1(c).			unmitigated loss of resources.
Utilities and Service Systems	U-1 Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	5.19-1	Less than Significant	The project generates no new permanent wastewater; temporary stormwater discharges during decommissioning are managed by existing regulations.
	U-2 Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	5.19-2	Less than Significant	The project does not generate new permanent wastewater flows, creating no new demand that would require new or expanded facilities.
	U-3 Result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	5.19-3	Less than Significant	The project generates no new wastewater flows that enter the public sewer system, as temporary workforce needs are handled by portable units or existing facilities.
	U-4 Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which	5.19-4	Less than Significant	The project does not create new permanent water demand; the temporary demand is minimal and can be

	could cause significant environmental effects.			served by existing systems.
	U-5 Not have sufficient water supplies available to serve the project from existing entitlements and resources, necessitating new or expanded entitlements.	5.19-5	Less than Significant	The project's water demand is temporary and minimal; the long-term effect is a net reduction in water use by ceasing a water-intensive industrial operation.
	U-6 Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.	5.19-6	Less than Significant	Waste generation is temporary and phased over 20 years; regional landfills have adequate capacity, and mandatory recycling will divert a substantial portion of the debris.
	U-7 Not comply with federal, state, and local statutes and regulations related to solid waste.	5.19-7	Less than Significant	Mandatory compliance with all applicable federal, state, and local solid waste and recycling laws is required for all decommissioning activities.
	U-8 Increase demand for other public utilities (such as electricity, natural gas, or communication systems) to such an extent that it would require or result in the construction of new	5.19-8	Less than Significant	The temporary energy demand during decommissioning is minimal; the project permanently eliminates the significant energy consumption of active oil operations.

	facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.			
Wildfire	WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.	5.20-1	Less than Significant	The project does not permanently alter roadways; temporary traffic is managed via existing regulations.
	WF-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.	5.20-2	Less than Significant	The temporary ignition risk during decommissioning is managed by mandatory compliance with the County Fire Code and Cal/OSHA; the project permanently removes industrial ignition sources and flammable materials from high-hazard areas.
	WF-3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.	5.20-3	Less than Significant	The project involves removing existing infrastructure, not installing new roads, power lines, or fuel breaks that could exacerbate fire risk.

	WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.	5.20-4	Less than Significant	The project does not introduce a new permanent population into hazard zones; all grading must comply with the County Grading Code to ensure slope stability.
	WF-5 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.	5.20-5	Less than Significant	The project does not add new population to high-hazard areas; temporary ignition risks are managed by mandatory compliance with fire codes, and the long-term effect is the removal of an existing industrial hazard.

1.8.1 Significant and Unavoidable Impacts

CEQA requires an Environmental Impact Report (EIR) to identify any significant environmental impacts that can't be avoided or reduced to a less-than-significant level. The analysis in this EIR identified the following two significant and unavoidable impacts, both related to mineral resources:

1. Loss of a Known Mineral Resource of Value: A direct and necessary result of the objectives of the Project is the loss of availability of known oil and gas resources that are of value to the region and the state. Because any mitigation measure that would allow for extraction would conflict with the project's fundamental goals, this impact is considered significant and unavoidable.
2. Loss of a Locally Delineated Mineral Resource Recovery Site: The General Plan Land Use Policy Map delineates major oil fields with a "Mineral Resources" designation, identifying them as locally important mineral resource recovery sites. The Project will permanently cause the loss of availability of these specific sites by amending the General Plan to remove this designation and requiring all operations within them to be decommissioned. Mitigation for this impact is also considered infeasible, as it would undermine the project's core purpose. Therefore, this impact is also considered significant and unavoidable.

CHAPTER 2 INTRODUCTION

2.1 PROJECT OVERVIEW

The Project, known as the Revised Oil Well Ordinance, aims to phase out oil production activities and remove associated industrial infrastructure in the unincorporated areas of Los Angeles County. The Project is initiated and administered by the County of Los Angeles, which serves as the lead agency pursuant to the California Environmental Quality Act (CEQA).

The Revised Oil Well Ordinance will do the following in unincorporated Los Angeles County, except the Coastal Zone:

1. Prohibit new oil wells and production facilities.
2. Designate existing oil and gas production facilities as nonconforming uses, subject to an amortization period of 20 years.
3. Incorporate performance standards during the remaining operation and decommissioning period (e.g., for well plugging, site maintenance, and restoration).
4. Align County land use policies with regional sustainability, environmental justice, and public health goals.

2.2 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

CEQA requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft Environmental Impact Report (EIR) has been prepared to satisfy CEQA and the CEQA Guidelines. An EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of a proposed project, and to indicate possible ways to reduce or avoid environmental damage through mitigation measures and project alternatives. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (Public Resources Code, Section 21067). The County of Los Angeles Department of Regional Planning has principal responsibility for approval of the Revised Oil Well Ordinance. For this reason, the County of Los Angeles is the CEQA lead agency for this Project. The intent of the EIR is to provide sufficient information on the potential environmental impacts of the Revised Oil Well Ordinance to allow the County of Los Angeles to make an informed decision regarding approval of the Project.

This EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 21000 et seq.)
- State Guidelines for the Implementation of CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations [CCR], Sections 15000 et seq.)

The overall purpose of this EIR is to inform the lead agency, responsible agencies, decision makers, and the public about the environmental effects associated with implementation of the Revised Oil Well Ordinance. This EIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

2.3 TYPE, PURPOSE, AND INTENDED USES OF THE EIR

This EIR provides a program-level environmental analysis specifically focused on the policy changes proposed by the Revised Oil Well Ordinance. Therefore, this EIR analyzes the potential environmental impacts of the policy itself, including the reasonably foreseeable physical consequences of the mandated countywide decommissioning and site restoration activities.

A program-level EIR is appropriate for this Project for several reasons:

- Program-Level Focus: The analysis is limited to the direct and indirect effects of the policy changes proposed by the Project.
- Regulatory Context: The Project applies to all unincorporated areas of Los Angeles County under the County's land use jurisdiction, with the exception of lands located within the California Coastal Zone.
- Subsequent CEQA Review: While this EIR evaluates the programmatic effects of the phase-out, actual, site-specific decommissioning projects will be subject to separate CEQA review and permitting by the California Department of Conservation Geologic Energy Management Division (CalGEM) and the County of Los Angeles. Any future development of former oil and gas sites will be subject to separate CEQA review and permitting by the County of Los Angeles Department of Regional Planning.
- Cumulative and Alternatives Analysis: The EIR considers cumulative environmental effects, explores potential alternatives, and discusses indirect environmental implications of the Project.

The purpose of this EIR is to inform the County Board of Supervisors, responsible agencies, and the public about the potential environmental impacts of adopting the Revised Oil Well Ordinance before any final approval or certification is granted. In other words, it discloses the effects of the policy change upfront, aiding decision-makers and the public in understanding the environmental implications prior to Project adoption.

Future oil well decommissioning projects implemented under the Project will require site-specific environmental review and permitting by CalGEM. Because the Project integrates mandatory performance standards and design features (PDFs) into the ordinance itself, traditional external mitigation measures are not required; any necessary site-specific environmental protections or

mitigation will be determined through subsequent project-level reviews and approvals by the appropriate agencies.

2.4 NOTICE OF PREPARATION AND SCOPING MEETING

The County of Los Angeles determined that an EIR would be required for this project and issued a Notice of Preparation (NOP) in accordance with Section 15082 of the CEQA Guidelines. The 30-day public review period began on March 27, 2025, and concluded on April 26, 2025. The NOP was distributed to the State Clearinghouse, public agencies, special districts, responsible and trustee agencies, and other interested parties; and was filed with the Los Angeles County Clerk. Printed copies of the NOP were available for public review at library locations throughout Los Angeles County. In addition, electronic copies were made available for download at: https://planning.lacounty.gov/long-range-planning/revised-oil-well-ordinance/.

The NOP process assists in determining the scope of the environmental issues to be addressed in the EIR. All issues considered to be Potentially Significant, Less than Significant, and No Impact are addressed in this EIR.

Pursuant to Public Resources Code 21083.9 and CEQA Guidelines Section 15082(c), the lead agency is required to conduct at least one scoping meeting for projects of state-wide, regional, or area-wide significance. Thus, the County held a virtual scoping meeting on April 17, 2025, from 6 to 7 PM. A total of 26 members of the public attended the virtual scoping meeting. Comments received during the 30-day scoping period are summarized in Table 2-1, Summary of Scoping Comments Received. At the conclusion of the presentation, attendees of the scoping meeting were able to provide comments and questions about the Project to County staff during the question-and-answer portion of the meeting. Twenty comment letters were received from agencies, organizations, and tribes in response to the NOP. All comment letters received, as well as comments received during the scoping meeting, are provided in Appendix B to this EIR.

2.4.1 Summary of Scoping Comments

This section summarizes the written comments received during the scoping period. The original comment letters are included in Appendix B of this EIR. The comments have been organized by topic to provide a comprehensive overview of the key issues raised.

List of Commenters

The following agencies, organizations, and individuals submitted written comments during the NOP public scoping period:

1. State Agencies
    a. California Department of Transportation (Caltrans)
    b. Native American Heritage Commission (NAHC)
2. Local Agencies
    a. City of Culver City
3. Organizations
    a. California Independent Petroleum Association (CIPA)

   b. Capitol Matrix Consulting (CMC)
   c. Hills For Everyone (HFE)
   d. LA County Coalition (a coalition including the Center for Biological Diversity, Black Women for Wellness, Physicians for Social Responsibility Los Angeles, Communities for a Better Environment, Sierra Club, and Natural Resources Defense Council)
   e. Manatt, Phelps & Phillips, LLP (on behalf of Matrix Oil Corporation, Royale Energy, Inc., and RMX Resources LLC)
   f. The Termo Company
4. Individuals
   a. Greg Dyer
   b. Tim Jones
   c. Chris Kilpatrick
   d. Douglas Kilpatrick
   e. John Kuechle
   f. Kenneth L. Kutcher
   g. Steven S. Lamb
   h. Perfecto Lopez
   i. Bobb Lynes
   j. Michael Monagan

Summary of Issues Raised

The comments received covered a range of topics. The following is a summary of the substantive environmental points raised by the commenters, organized by environmental issue area.

Project Scope and CEQA Process

Several commenters from the oil and gas industry (CIPA, Manatt, The Termo Company, CMC) stated that the EIR's scope, as suggested in the Initial Study, is too narrow and must be expanded to analyze a wider range of potential environmental impacts beyond Mineral Resources. These include Aesthetics, Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas (GHG) Emissions, Land Use, Noise, and Wildfire.

CIPA stated that the Initial Study's environmental baseline is inaccurate and does not reflect existing conditions, particularly regarding health risks in communities near oil operations.

John Kuechle stated that the EIR is improperly "piecemealing" the environmental review by not analyzing the reasonably foreseeable impacts of future development that would occur on oil field lands once drilling is prohibited.

The LA County Coalition stated that the Project is environmentally beneficial and should be exempt from CEQA under a Class 8 exemption for actions taken to protect the environment.

They argued that the analysis should focus on the significant environmental effects of not implementing the Project.

The City of Culver City requested a more detailed Project Description, including the specific number of wells and acreage affected, particularly within the Inglewood Oil Field (IOF), and the assumed timing and phasing of well plugging and site restoration activities.

Land Use and Planning

The City of Culver City stated that a portion of the IOF lies within its planning sphere of influence and that the EIR should evaluate consistency with the City's General Plan. They also stated the need for coordination between the County and the City on decommissioning activities and future land uses.

Hills For Everyone requested clarification on how land use designations will change after oil production ceases and encouraged amending zoning codes to preclude future industrial uses and prioritize permanent conservation of restored lands.

CIPA argued that the Project's ordinance conflicts with County General Plan policies aimed at protecting mineral resources.

Air Quality and Greenhouse Gas (GHG) Emissions

Commenters representing the oil industry and several individuals (CIPA, CMC, Manatt, The Termo Company, Chris Kilpatrick, Steven S. Lamb) stated that phasing out local oil production would not decrease demand, but would lead to an increased reliance on imported oil. This, they argue, would result in higher GHG emissions and air pollutants from tanker ships and other transportation methods. They requested the EIR analyze these "downstream" impacts.

The LA County Coalition and Michael Monagan stated that the Project would have positive impacts on air quality and climate by reducing fossil fuel extraction, which is a major source of air pollution and GHG emissions.

Kenneth L. Kutcher disputed the oil industry's claims regarding the necessity of foreign oil imports, arguing that the United States has sufficient domestic oil reserves.

Biological and Cultural Resources

The Native American Heritage Commission (NAHC) provided detailed guidance on the requirements for tribal consultation under Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18) and recommended conducting a Sacred Lands File search.

CIPA, the City of Culver City, Manatt, and The Termo Company raised concerns that well plugging, site remediation, and subsequent redevelopment could disturb sensitive biological habitats and cultural resources. The Termo Company stated that its operations provide de facto wildlife habitat, and CIPA stated that some oil fields contain habitat for sensitive species.

Hazards, Pollution, and Wildfire

The City of Culver City stated that the IOF is in a Very High Fire Hazard Severity Zone and that decommissioning activities and the potential for the land to remain vacant could increase wildfire risk. The Termo Company shared this concern regarding the loss of defensible space and access to roads.

Perfecto Lopez raised concerns about existing, improperly sealed oil wells in Towsley Canyon that are actively contaminating water sources for wildlife and creating strong odors, urging that operating companies be held responsible for proper cleanup and closure.

Chris Kilpatrick stated that the ordinance could lead to the risk of improper well abandonment, which could create greater environmental liabilities over time.

Transportation

Caltrans requested that the Project's contractors coordinate with local agencies to manage construction traffic, schedule deliveries during off-peak hours, and use established haul routes. They noted that an Encroachment Permit would be required for any work in the State Right-of-Way.

Economic Impacts and Mineral Resources

Multiple commenters (CIPA, Capitol Matrix Consulting, Chris Kilpatrick, Douglas Kilpatrick, Greg Dyer, Steven S. Lamb) stated opposition to the Project on economic grounds. They stated that the oil industry provides essential jobs, tax revenue, and domestically produced energy and raw materials for countless consumer products.

Capitol Matrix Consulting requested the EIR include studies on job losses, the capacity of local ports to handle replacement crude, supply risks associated with import dependence, and the impact on Southern California refinery operations.

The LA County Coalition stated that the Project would have net-positive economic impacts by reducing public health costs associated with pollution from oil extraction and by avoiding costly climate-related disasters.

Financial Responsibility for Remediation

Tim Jones raised concerns about the financial responsibility for the complete remediation of the oil fields, questioning the adequacy of existing bonds to cover the full cost of plugging wells and restoring the land, particularly for different future land uses.

Project Alternatives

The City of Culver City suggested that the EIR evaluate alternatives with different amortization or decommissioning schedules (e.g., a more consolidated phase-out period) and a "Green Energy Project(s)" alternative that could replace the energy displaced by the Project.

Kenneth L. Kutcher requested that an alternative be considered to rezone the Inglewood Oil Field to Open Space, consistent with the "One Big Park" concept.

CIPA suggested an alternative that would apply the existing conditions of the Baldwin Hills Community Standards District to all other active oil and gas operations in unincorporated Los Angeles County.

Legal Issues

CIPA, Manatt, and The Termo Company stated that the Project is preempted by state law, citing recent court decisions, and that it would violate the vested property rights of operators, potentially constituting a compensable taking. Manatt stated that the Project should not affect operations with vested rights.

TABLE 2-1: Summary of Scoping Comments Received

Commenter	Topic(s)	Summary of Comment
State Agencies		
California Department of Transportation (Caltrans)	Transportation	Recommends coordination with local agencies to manage construction traffic, scheduling deliveries during off-peak hours, and notes that an Encroachment Permit is required for work in the State Right-of-Way.
Native American Heritage Commission (NAHC)	Cultural Resources	Provides detailed guidance on the legal requirements for tribal consultation (AB 52 and SB 18) and recommends a Sacred Lands File search to identify tribal cultural resources.
Local Agencies		
City of Culver City	Project Description, Land Use,	Requests a more detailed project description, particularly for the Inglewood Oil Field (IOF). Stresses the need to evaluate land use consistency with Culver City's General Plan and to

	Biological & Cultural Resources, Hazards & Wildfire, Project Alternatives	coordinate on future land use. Raises concerns about impacts on biological and cultural resources, increased wildfire risk, and suggests analyzing alternatives with different phase-out schedules and a green energy project alternative.
Organizations		
California Independent Petroleum Association (CIPA)	Project Scope, CEQA Process, Land Use, Air Quality & GHG, Biological Resources, Legal Issues	Argues the EIR's scope is too narrow, and the environmental baseline is inaccurate. States the Project will lead to increased oil imports, causing greater air pollution and GHG emissions. Believes the Project conflicts with the County's General Plan and is preempted by state law. Notes that oil fields provide important habitat for sensitive species.
Capitol Matrix Consulting (CMC)	Project Scope, Air Quality & GHG, Economic Impacts	States the EIR scope is too narrow. Argues phasing out local production will increase reliance on imported oil, leading to higher GHG emissions. Requests the EIR study the economic impacts, including job losses, port capacity, supply chain risks, and impacts on local refineries.
Hills For Everyone (HFE)	Land Use, Environmental Justice	Supports the Project. Encourages the County to prioritize permanent conservation of lands after remediation. Asks for clarification on future land use designations and recommends amending zoning to prevent future industrial uses on these sites.
LA County Coalition	Project Scope, CEQA Process, Air Quality & GHG, Economic Impacts	Asserts the Project is environmentally beneficial and should be exempt from CEQA. Argues that phasing out oil drilling will have positive impacts on air quality and climate, and that the economic benefits (e.g., improved public health, avoided climate disaster costs) are net-positive.
Manatt, Phelps & Phillips, LLP	Project Scope, Air Quality & GHG, Biological & Cultural Resources, Legal Issues	Argues the EIR scope is too narrow and must analyze a wide range of impacts. States the Project will increase oil imports and associated air and GHG emissions. Raises concerns about impacts to habitats and cultural resources during decommissioning and redevelopment. Argues the Project is preempted by state law and violates vested property rights.
The Termo Company	Project Scope, Air Quality & GHG, Biological Resources, Hazards &	Argues the EIR scope is too narrow and that increased oil imports will worsen air quality and GHG emissions. Notes that oil fields provide de facto wildlife habitat. Expresses concern that removing oil field infrastructure could increase

	Wildfire, Legal Issues	wildfire risk. Argues the Project is preempted by state law and violates vested rights.
Individuals		
Greg Dyer	Economic Impacts & Mineral Resources	Opposes the prohibition of new wells and the closure of existing ones, stating that local resources should be utilized until a sustainable alternative to oil and gas is available.
Tim Jones	Financial Responsibility	Raises concerns about who will be financially responsible for the full cost of remediation, questioning if existing bonds are sufficient to cover well plugging and land restoration.
Chris Kilpatrick	Economic Impacts, Hazards, Air Quality & GHG	Opposes the Project, citing the economic value of the oil industry. Argues that phasing out local production shifts supply to other sources, increasing transport-related emissions and costs. Warns of the environmental risk of improper well abandonment if the industry is forced to shut down.
Douglas Kilpatrick	Economic Impacts & Mineral Resources	Opposes the Project, stating that oil is essential and restricting local production is not sensible when demand remains.
John Kuechle	Project Scope & CEQA Process	Argues that the EIR is improperly "piecemealing" the review by failing to analyze the foreseeable environmental impacts of the future development that will inevitably occur on the oil field lands once drilling ceases.
Kenneth L. Kutcher	Air Quality & GHG, Project Alternatives	Supports phasing out oil operations. Disputes industry claims about the need for foreign oil imports. Requests an EIR alternative that would rezone the Inglewood Oil Field to Open Space, consistent with the "One Big Park" concept.
Steven S. Lamb	Economic Impacts, Air Quality & GHG	Opposes the Project, highlighting the reliance of modern society on petroleum products. Argues that closing clean local wells will export pollution to other countries by increasing reliance on foreign oil with lower environmental standards.
Perfecto Lopez	Hazards & Pollution	Raises concern about existing, improperly sealed oil wells in Towsley Canyon that are actively polluting water sources for wildlife and creating strong odors. Urges that companies be held responsible for cleanup and proper closure.

Bobb Lynes	Economic Impacts, Air Quality & GHG	Concurs with Steven S. Lamb, opposing the Project and arguing that it will increase pollution globally by shifting production to less-regulated regions.
Michael Monagan	Air Quality & GHG	Supports shutting down the Inglewood Oil Field as soon as possible, citing the ongoing danger to public health and the planet from fossil fuels and the climate crisis.

2.5 SCOPE OF THIS EIR

Preparation of the EIR follows and is informed by the scoping process. Article 9 of the CEQA Guidelines (CEQA Guidelines Sections 15120–15132) establishes the required contents of an EIR. These are summarized below.

(1) Table of contents: A table of contents is provided at the beginning of this document.

(2) Summary: An executive summary is provided in Chapter 1, *Executive Summary*.

(3) Environmental Setting: The environmental setting is described from a regional and local perspective in Chapter 4, *Environmental Setting.*

(4) Project Description: A description of the Project is provided in Chapter 3, *Project Description.*

(5) Analysis of impacts of the Project: Potential impacts of the Project are described in Chapter 5, *Environmental Analysis.* Additional mandatory impact discussions are provided in Chapter 6, *Other CEQA Considerations*; Chapter 8, *Effects Found Not to Be Significant*; and Chapter 9, *Significant Cumulative Impacts*.

(6) Consideration and discussion of mitigation measures proposed to minimize potential significant impacts: Mitigation measures and Project Design Features (PDFs) are discussed within the respective resource sections of Chapter 5, *Environmental Analysis*.

(7) Consideration and discussion of alternatives to the Project, including a No Project Alternative: The alternatives development screening process, alternatives rejected from detailed consideration, and the alternatives evaluated in detail in this Draft EIR are described in Chapter 7, *Project Alternatives.*

(8) Organizations and persons consulted: Federal, state, and local agencies; Tribal entities and members; and organizations and individuals consulted pursuant to the preparation of this Draft EIR are identified in Chapter 10, *Organizations and Persons Consulted.*

2.5.1 Unavoidable Significant Adverse Impacts

This EIR identifies significant and unavoidable adverse impacts to one topic, as defined by CEQA, that would result from the implementation of the Project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The County must prepare a "statement of overriding considerations" before it can approve the Project, attesting that the decision-making body has balanced the benefits of the Project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impacts that were found in the Draft EIR to be significant and unavoidable are:

Mineral Resources

2.6 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this EIR, consistent with Section 15150 of the CEQA Guidelines, including but not limited to the following:

- County of Los Angeles 2035 General Plan and EIR, County of Los Angeles, Department of Regional Planning (2015)
    - General Plan Elements:
        - County of Los Angeles 2045 Climate Action Plan and EIR, County of Los Angeles, Department of Regional Planning (2024)
        - County of Los Angeles General Plan Safety Element Update, County of Los Angeles, Department of Regional Planning (2022)
        - Housing Element 2021-2029 and EIR, County of Los Angeles, Department of Regional Planning (2022)
- Los Angeles County Zoning Code, Title 22, (2022)
- Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]), SCAG (2024)
- Vision Zero, County of Los Angeles, Department of Public Works (2019)
- Baldwin Hills Community Standards District EIR (2008)

2.7 FINAL EIR CERTIFICATION

The Draft EIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the Draft EIR to the County address shown on the title page of this document. Upon completion of the 45-day review period, the County of Los Angeles will review all written comments received and prepare written responses for each. A Final EIR will incorporate the received comments, responses to the comments, and any changes to the Draft EIR that result from comments. The Final EIR will be presented to the County of Los Angeles Board of Supervisors for potential certification as the environmental document for the Project. All agencies, organizations, and individuals who comment on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the County.

The Draft EIR is available to the public for review at various locations:

County of Los Angeles Department of Regional Planning; 320 West Temple Street, Los Angeles, CA 90012
A C Bilbrew Library: 150 E El Segundo Blvd, Los Angeles, CA 90061
Acton Agua Dulce Library: 33792 Crown Valley Rd, Acton, CA 93510
Agoura Hills Library: 29901 Ladyface Court, Agoura Hills, CA 91301
Alondra Library: 11949 Alondra Blvd, Norwalk, CA 90650
Angelo M. Iacoboni Library: 4990 Clark Ave, Lakewood, CA 90712
Anthony Quinn Library: 3965 Cesar E Chavez Ave, Los Angeles, CA 90063
Artesia Library: 18801 Elaine Avenue, Artesia, CA 90701
Avalon Library: 215 Sumner Ave, Avalon, CA 90704
Baldwin Park Library: 4181 Baldwin Park Blvd, Baldwin Park, CA 91706
Bell Express Library: 4357 E Gage Ave, Bell, CA 90201
Bell Gardens Library: 7110 S Garfield Ave, Bell Gardens, CA 90201
Carson Library: 151 E Carson St, Carson, CA 90745
Castaic Library: 27971 Sloan Canyon Rd, Castaic, CA 91384
Charter Oak Library: 20540 E Arrow Highway Suite K, Covina, CA 91724
Chet Holifield Library: 1060 S Greenwood Ave, Montebello, CA 90640
City Terrace Library: 4025 E City Terrace Dr, Los Angeles, CA 90063
Claremont Helen Renwick Library: 208 N Harvard Ave, Claremont, CA 91711
Clifton M. Brakensiek Library: 9945 E Flower St, Bellflower, CA 90706
Compton Library: 240 W Compton Blvd, Compton, CA 90220
Cudahy Library: 5218 Santa Ana St, Cudahy, CA 90201
Culver City Julian Dixon Library: 4975 Overland Ave, Culver City, CA 90230
Diamond Bar Library: 21800 Copley Dr, Diamond Bar, CA 91765
Dr. Martin Luther King, Jr. Library: 17906 S Avalon Blvd, Carson, CA 90746
Duarte Library: 1301 Buena Vista St, Duarte, CA 91010
East Los Angeles Library: 4837 E 3rd St, Los Angeles, CA 90022
East Rancho Dominguez Library: 4420 E Rose St, East Rancho Dominguez, CA 90221
El Camino Real Library: 4264 E Whittier Blvd, Los Angeles, CA 90023
El Monte Library: 3224 Tyler Ave, El Monte, CA 91731
Florence Library: 7807 Compton Ave, Los Angeles, CA 90001
Gardena Mayme Dear Library: 1731 W Gardena Blvd, Gardena, CA 90247
George Nye, Jr. Library: 6600 Del Amo Blvd, Lakewood, CA 90713
Graham Library: 1900 E Firestone Blvd, Los Angeles, CA 90001
Hacienda Heights Library: 16010 La Monde St, Hacienda Heights, CA 91745
Hawaiian Gardens Library: 11940 Carson St, Hawaiian Gardens, CA 90716
Hawthorne Library: 12700 Grevillea Ave, Hawthorne, CA 90250
Hermosa Beach Library: 550 Pier Ave, Hermosa Beach, CA 90254
Hollydale Library: 12000 Garfield Ave, South Gate, CA 90280
Huntington Park Library: 6518 Miles Ave, Huntington Park, CA 90255
La Cañada Flintridge Library: 4545 N Oakwood Ave, La Canada Flintridge, CA 91011
La Crescenta Library: 2809 Foothill Blvd, La Crescenta, CA 91214
La Mirada Library: 13800 La Mirada Blvd, La Mirada, CA 90638
La Puente Library: 15920 E Central Ave, La Puente, CA 91744
La Verne Library: 3640 D St, La Verne, CA 91750
Lake Los Angeles Library: 16921 E Avenue O, #A, Palmdale, CA 93591
Lancaster Library: 601 W Lancaster Blvd, Lancaster, CA 93534

Lawndale Library: 14615 Burin Ave, Lawndale, CA 90260
Leland R. Weaver Library: 4035 Tweedy Blvd, South Gate, CA 90280
Lennox Library: 4359 Lennox Blvd, Lennox, CA 90304
Littlerock Library: 35119 80th St East, Littlerock, CA 93543
Live Oak Library: 22 W Live Oak Ave, Arcadia, CA 91007
Lloyd Taber-Marina del Rey Library: 4533 Admiralty Way, Marina del Rey, CA 90292
Lomita Library: 24200 Narbonne Ave, Lomita, CA 90717
Los Nietos Library: 8511 Duchess Drive, Whittier, CA 90606
Lynwood Express Library: 3798 Martin Luther King Jr. Blvd, Lynwood, CA 90262
Malibu Library: 23519 W Civic Center Way, Malibu, CA 90265
Manhattan Beach Library: 1320 Highland Ave, Manhattan Beach, CA 90266
Masao W. Satow Library: 14433 Crenshaw Blvd, Gardena, CA 90249
Maywood César Chávez Library: 4323 E Slauson Ave, Maywood, CA 90270
Montebello Library: 1550 W Beverly Blvd, Montebello, CA 90640
Norwalk Library: 12350 Imperial Hwy, Norwalk, CA 90650
Norwood Library: 4550 N Peck Rd, El Monte, CA 91732
Paramount Library: 16254 Colorado Ave, Paramount, CA 90723
Pico Rivera Library: 9001 Mines Ave, Pico Rivera, CA 90660
Quartz Hill Library: 5040 West Avenue M-2, Quartz Hill, CA 93536
Rivera Library: 7828 S Serapis Ave, Pico Rivera, CA 90660
Rosemead Library: 8800 Valley Blvd, Rosemead, CA 91770
Rowland Heights Library: 1850 Nogales Street, Rowland Heights, CA 91748
San Dimas Library: 145 N Walnut Ave, San Dimas, CA 91773
San Fernando Library: 217 N Maclay Ave, San Fernando, CA 91340
San Gabriel Library: 500 S Del Mar Ave, San Gabriel, CA 91776
Sorensen Library: 6934 Broadway Ave, Whittier, CA 90606
South El Monte Library: 1430 North Central Avenue, South El Monte, CA 91733
South Whittier Library: 11543 Colima Road, Whittier, CA 90604
Stevenson Ranch Library: 25950 The Old Road, Stevenson Ranch, CA 91381
Sunkist Library: 840 N Puente Ave, La Puente, CA 91746
Temple City Library: 5939 Golden West Ave., Temple City, CA 91780
Topanga Library: 122 N Topanga Canyon Blvd, Topanga, CA 90290
View Park Bebe Moore Campbell Library: 3854 W 54th St, Los Angeles, CA 90043
Walnut Library: 21155 La Puente Rd, Walnut, CA 91789
West Covina Library: 1601 W Covina Pkwy, West Covina, CA 91790
West Hollywood Library: 625 N San Vicente Blvd, West Hollywood, CA 90069
Westlake Village Library: 31220 Oak Crest Dr, Westlake Village, CA 91361
Willowbrook Library: 11737 Wilmington Ave, Los Angeles, CA 90059
Wiseburn Library: 5335 W 135th St, Hawthorne, CA 90250
Woodcrest Library: 1340 W 106th St, Los Angeles, CA 90044

2.8 COMPLIANCE MONITORING AND REPORTING

Public Resources Code Section 21081.6 requires that agencies adopt a Mitigation Monitoring and Reporting Program (MMRP) for any project for which it has adopted formal mitigation measures to avoid or substantially lessen significant environmental effects.

The Project is a regulatory action that mandates the phase-out and decommissioning of existing oil and gas sites. To ensure that these mandated activities do not result in significant

environmental impacts, the County has integrated comprehensive, mandatory performance standards directly into the proposed Ordinance. Throughout this EIR, these mandatory standards are referred to as Project Design Features (PDFs) (e.g., PDF-TCR-1, which requires a Cultural Assessment prior to ground disturbance).

Because the Project relies on these legally binding PDFs and existing regulatory compliance (rather than external CEQA mitigation measures) to ensure impacts remain less than significant, a statutory MMRP is not required. However, to ensure rigorous oversight and transparency, the County will adopt a Compliance Monitoring Plan at the time of Project approval. This document will explicitly identify the specific County departments responsible for verifying and enforcing operator compliance with each mandatory PDF throughout the 20-year amortization and decommissioning process.

While limited by-right redevelopment opportunities may exist depending on a site's underlying zoning, almost any substantial future redevelopment proposal on legacy oil production sites will require discretionary approvals and be subject to its own independent CEQA review, at which time project-specific mitigation measures and a dedicated MMRP would be adopted if necessary.

CHAPTER 3 PROJECT DESCRIPTION

This chapter provides a detailed description of the Revised Oil Well Ordinance (the Project), as required by the California Environmental Quality Act (CEQA). Pursuant to Section 15124 of the State CEQA Guidelines, a clear, stable, and finite project description is essential for an Environmental Impact Report (EIR). It forms the basis for the environmental analysis, allowing public agencies and the public to understand the Project and its potential environmental effects. This description includes the Project's objectives, location, primary components, and operational characteristics, thereby defining the "whole of the action" for the subsequent analysis in this report.

3.1 PROJECT OVERVIEW

Under CEQA, the "Project" is the entirety of the actions that have the potential to result in direct or indirect physical changes in the environment. The Project is a comprehensive regulatory update initiated by the County of Los Angeles. It consists of a new ordinance amending Title 12 (Environmental Protection) and Title 22 (Planning and Zoning, including the Baldwin Hills Community Standards District (CSD) and Newhall Ranch Specific Plan) and amendments to the County of Los Angeles General Plan.

The fundamental purpose of the Project is to establish a regulatory framework that prohibits new oil and gas wells and phases out existing production facilities to provide maximum protection for public health, safety, and the environment within the unincorporated areas of Los Angeles County. The Project seeks to align County land use policies with regional sustainability and environmental justice goals, while ensuring the safe and orderly decommissioning of existing oil production operations. For the purposes of this EIR, "decommissioning" is defined as the process of permanently ceasing oil and gas operations, which includes the plugging and abandonment of wells, the removal of surface equipment, and the baseline environmental remediation of site contamination as mandated by the proposed regulations and other applicable state laws.

The Ordinance does not entitle, and thus the Project does not include, any future redevelopment or reuse of these sites. What might ultimately be built on decommissioned oil sites, and at what intensity or scale, is highly speculative at this time. Future redevelopment would be driven by individual property owner decisions. While limited by-right redevelopment opportunities may exist depending on a site's underlying zoning, almost any substantial redevelopment would require future discretionary legislative or permitting actions and would thus be subject to its own independent CEQA review. Therefore, the scope of the physical impact analysis in this EIR is strictly limited to: (1) the cessation of oil and gas extraction; and (2) the physical decommissioning,

plugging, abandonment, and baseline site remediation activities that are reasonably foreseeable consequences of the Ordinance.

Subsequent sections of this chapter will provide further details on the Project location, objectives, proposed regulatory changes, phasing, and a list of anticipated discretionary actions and required approvals.

3.2 PROJECT PROPONENT AND LEAD AGENCY

The County of Los Angeles is the Lead Agency for the Project under the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.). CEQA defines Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project. The County of Los Angeles, through its Department of Regional Planning and with final approval by the Board of Supervisors, has the primary responsibility for the adoption and implementation of the Project.

The County of Los Angeles is also the Project Proponent, as it is initiating the proposed regulatory changes.

The contact information for the Lead Agency is:

County of Los Angeles
Department of Regional Planning
Ordinance Studies
Hall of Records, 13th Floor
320 West Temple Street
Los Angeles, CA 90012
ordinance@planning.lacounty.gov
(213) 974-6432

3.3 PROJECT LOCATION

The Project encompasses regulatory changes that apply within unincorporated Los Angeles County. The primary components of the Project and their respective locations are described below, and a more detailed description of existing conditions can be found in *Chapter 4: Environmental Setting* of this EIR. Maps illustrating the Project location and its key areas are provided in Figures 3-A through 3-C at the end of this Chapter.

Regional Setting: Los Angeles County is in the southern portion of California and is one of the most populous counties in the United States. It encompasses a diverse range of environments, including coastal plains, mountain ranges, valleys, and desert areas, with extensive urban, suburban, and rural communities. Los Angeles County is bordered by Kern County to the north,

San Bernardino County to the east, Orange County to the southeast, and Ventura County to the west.

Countywide Applicability: The proposed amendments to Titles 12 and 22 of the Los Angeles County Code regarding oil wells and production facilities will apply to all unincorporated areas of Los Angeles County, except the Coastal Zone. Unincorporated areas are those lands that are outside the jurisdictional boundaries of incorporated cities and are subject to the land use authority of the County of Los Angeles (Figure 3-A).

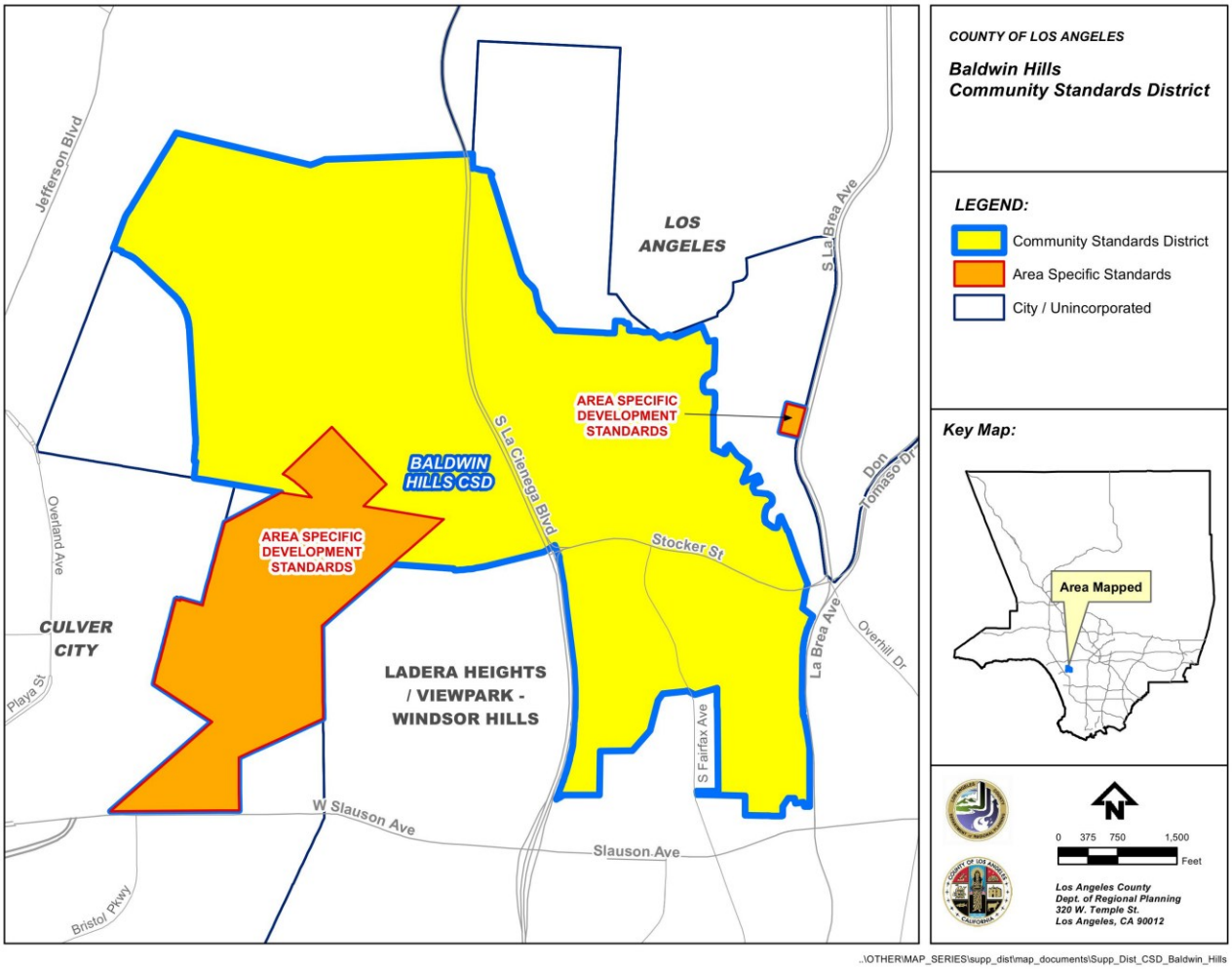
Figure 3-A Los Angeles Unincorporated Areas



Source: LA County Planning, September, 2025

Baldwin Hills Community Standards District (CSD): A component of the Project involves specific amendments to the Baldwin Hills CSD (Los Angeles County Code Chapter 22.310) in Title 22 of the Los Angeles County Code. The Baldwin Hills CSD is an existing regulatory district established to provide specific development standards and operational controls for oil and gas activities within the Inglewood Oil Field. The Baldwin Hills CSD applies to the west-central portion of Los Angeles County, generally south of the City of Culver City and west of the View Park-Windsor Hills unincorporated community. The boundaries of the CSD are officially delineated in Title 22 Chapter 22.310 of the Los Angeles County Code (Figure 3-B).

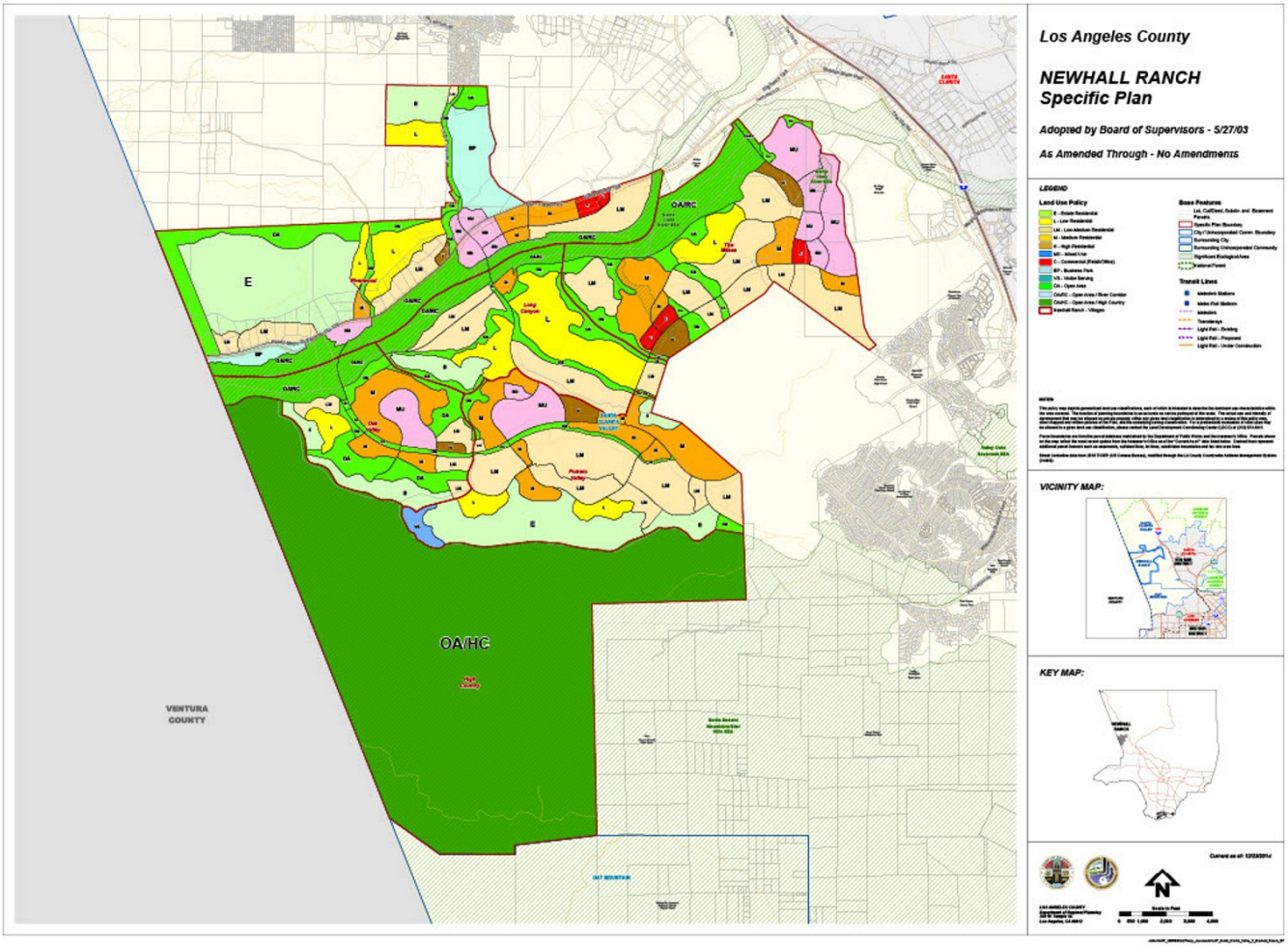
Figure 3-B Baldwin Hills Community Standards District Map



Newhall Ranch Specific Plan: Additionally, the Project includes targeted amendments to the Newhall Ranch Specific Plan. These amendments are designed to align the Specific Plan with the Project's broader goals by establishing provisions to phase out oil production activities within the Newhall Ranch Specific Plan area, located in the northwestern portion of Los Angeles County, in the Santa Clarita Valley. The specific boundaries of the Newhall Ranch Specific Plan area are defined in the Los Angeles County Code, Section 22.406.020 (Figure 3- C). These amendments

will ensure a coordinated approach to the cessation of oil extraction and future land use planning within this designated area. A specific amendment is necessary for Newhall Ranch because, unlike the County's other specific plans, it contains unique, self-contained oil extraction regulations that supersede the general provisions of Title 22 (Planning & Zoning). The general Title 22 ordinance of the Project will apply to the County's other specific plans as applicable—including Universal Studios, Northlake, La Vina, Connect Southwest LA, East Los Angeles Third Street, Florence-Firestone TOD, and Willowbrook TOD—as they default to Title 22 standards for oil regulation. In addition, as the Project does not apply in the Coastal Zone, it would not apply to the Marina Del Rey and Santa Catalina Island specific plans.

Figure 3- C Newhall Ranch Specific Plan Map



Quantitative Overview: To establish the physical scale and magnitude of the regulatory program, it is necessary to quantify the existing oil and gas infrastructure within the Project Area. The environmental baseline for this Project is established using data from the California Geologic Energy Management Division (CalGEM) as of the April 2025 Notice of Preparation for the Project. At that time, oil- and gas-related activity was identified on 337 unique parcels distributed across 10 of the County's 11 Planning Areas. This existing infrastructure is categorized as follows: 248

parcels contain one or more active or idle oil and gas extraction wells, 25 parcels contain only ancillary wells (such as injection, water source, or disposal wells), 64 parcels contain only surface production facilities (such as tanks, separators, and pipelines) without an active or idle extraction well. These parcels collectively encompass approximately 19,064 acres and contain 609 active extraction wells and 529 idle extraction wells. The highest concentrations of this infrastructure are located within the Santa Clarita Valley, Metro, Westside, and Gateway Planning Areas. For example, the Santa Clarita Valley Planning Area contains 71 parcels encompassing over 10,000 acres, with 91 active and 165 idle extraction wells. Another significant concentration is located within the Baldwin Hills Community Standards District (CSD), which overlies the unincorporated portion of the Inglewood Oil Field.

3.4 PROJECT OBJECTIVES

The County of Los Angeles has established the following objectives for the Project, which are based on the fundamental purpose of the Project—to phase-out and ban oil and gas operations within unincorporated Los Angeles County so as to safeguard community health and well-being, protect air, water, biological, and ecological resources, and ensure responsible land use through environmental justice considerations. These objectives, informed by directives from the County of Los Angeles Board of Supervisors, are:

1. **Prioritize Public Health, Safety, and Environmental Justice:** To primarily protect and improve public health and safety for all communities in unincorporated Los Angeles County, with a particular focus on frontline and vulnerable populations, including communities of color and low-income communities, disproportionately affected by oil and gas operations. This includes significantly reducing exposures and pollution burden, and mitigating health risks associated with existing, potential future, and former oil and gas exploration, production, and decommissioning activities and their legacy environmental conditions.
2. **Enhance and Protect Overall Environmental Quality:** To improve and safeguard the quality of the environment—including air, water, soil, biological resources, and aesthetic value—by minimizing the adverse impacts of oil and gas operations and ensuring site remediation, restoration, and mitigation of ecological harm, thereby contributing to healthier communities and ecosystems.
3. **Prohibit Future Oil and Gas Development to Prevent New Risks:** To prohibit the establishment of new oil and gas exploration, drilling, and production wells and associated facilities throughout unincorporated Los Angeles County, thereby preventing the introduction of new potential adverse health, safety, and environmental impacts and averting future land use conflicts.
4. **Establish Robust Standards for Remaining Operations and Comprehensive Decommissioning:** To implement and enforce comprehensive and protective performance standards for remaining (non-conforming) oil well operations during their amortization, and for their eventual timely, safe, and environmentally sound decommissioning. This includes developing and implementing requirements for responsible party-funded plugging and abandonment of all wells, ensuring site

remediation, establishing robust financial assurance mechanisms (bonding), and restoring sites in accordance with clearly defined requirements.

5. **Implement Specific Protections and Decommissioning Strategies in Key Areas:** To apply the overarching health, safety, environmental, and land use compatibility objectives within designated areas through targeted regulatory updates, including:
    a. Amending the Baldwin Hills Community Standards District (CSD) (Los Angeles County Code Chapter 22.310) to guide decommissioning of the Inglewood Oil Field.
    b. Amending the Newhall Ranch Specific Plan to integrate updated oil and gas regulations, including provisions for the phase-out of existing oil production and ensuring decommissioning and restoration.
6. **Align with and Advance State and Regional Policies:** To align County regulations with, and advance the goals of, State legislative and policy directives aimed at transitioning away from fossil fuel extraction, protecting communities near oil and gas facilities, and ensuring comprehensive and responsible management of legacy oil production sites.

3.5 PROJECT COMPONENTS

The Project consists of five primary components:

1. Title 22 (Planning and Zoning) Ordinance Amendment: The Project proposes a new ordinance that would apply to all oil wells in unincorporated Los Angeles County, except the Coastal Zone. The key provisions include:
    a. Prohibition of New Wells: No new oil wells or associated production facilities may be established in any zone.
    b. Phase-Out of Existing Wells: Existing, legally established oil wells and facilities operating without a land use permit will be deemed nonconforming uses under Section 22.172 of the County Code. As nonconforming uses, they would be subject to removal after a 20-year amortization period.
    c. New Performance Standards: To minimize potential environmental and public health effects during the amortization period and through final site restoration, the Project includes a comprehensive suite of mandatory performance standards, which function as Project Design Features (PDFs). These are summarized by environmental topic area below:
        i. Aesthetics and Visual Resources
            1. PDF-AE-1 (Site and Well Identification): Requires clear signage at all sites with operator contact information and agency phone numbers for complaints.
            2. PDF-AE-2 (Ongoing Site Maintenance): Mandates facilities be maintained in a neat, orderly fashion, free of debris and weeds.
            3. PDF-AE-3 (Lighting Standards): Requires all temporary and permanent lighting to be minimal, shielded, and directed downward.
        ii. Cultural & Tribal Cultural Resources

1. PDF-TCR-1 (Cultural Assessment): Prior to the commencement of any ground-disturbing activities associated with decommissioning or site restoration, the Operator shall retain a qualified archaeologist to conduct a preliminary Cultural Resources Assessment. This assessment shall include a records search through the South Central Coastal Information Center (SCCIC) and a Phase I pedestrian survey to identify potential historical or tribal cultural resources. The Assessment shall be submitted to the Department of Regional Planning for review and file retention.

iii. Hazards & Hazardous Materials / Hydrology & Water Quality
1. PDF-HAZ-1 (Financial Assurance): The Ordinance requires operators to post sufficient indemnity bonds to cover the full cost of well plugging and abandonment.
2. PDF-HAZ-2 (Community Health, Safety, and Notification Plans): Mandates that, in the event of a zoning enforcement complaint, a comprehensive Community Health, Safety, and Notification Plan be prepared by every operator, to the satisfaction of the Department of Public Health.

iv. Land Use / Public Services
1. PDF-LU-1 (Decommissioning and Site Restoration Mandate): Establishes a clear, non-discretionary mandate for well plugging, abandonment, and site restoration upon cessation of activities. To provide a managed transition, this mandate applies to all oil wells and production facilities without a land use permit at the conclusion of a 20-year amortization period, pursuant to Los Angeles County Code Section 22.172.050.B.1.f (or upon earlier cessation of operations).
2. PDF-LU-2 (Decommissioning and Infrastructure Removal): To ensure complete site restoration, the Ordinance shall require the complete removal of all structures and equipment associated with the oil operation.
3. PDF-PS-1 (Public Complaint and Response Log): Requires operators to maintain and respond to a public complaint log.

2. Baldwin Hills Community Standards District (CSD) Amendment: The Project amends the Baldwin Hills CSD in Title 22 of the Los Angeles County Code to ensure its local regulations are consistent with the new countywide oil and gas Ordinance. This action incorporates the prohibitions and standards from the ordinance directly into the CSD, ensuring uniform application within the Inglewood Oil Field. The CSD will remain in full effect. While the amendment aligns the CSD with the new prohibition, the CSD's administrative structure is preserved to enforce rigorous, field-specific obligations, including enhanced monitoring, periodic audits, and community coordination, that are distinct from and exceed state regulations. These measures will continue to govern the field's operations through its eventual abandonment.
3. Newhall Ranch Specific Plan Amendment: The Project amends the Newhall Ranch Specific Plan to align its land use regulations with the new countywide oil and gas ordinance. This

ensures that the prohibition on new wells, updated performance standards, and decommissioning requirements are consistently implemented within the Specific Plan area. No other changes to the Newhall Ranch Specific Plan are proposed.

4. Title 12 (Environmental Protection) Noise Ordinance Amendment (PDF-NOI-1): The Project amends the County's Environmental Protection Code by eliminating the current exemption for oil and gas wells from the Noise Control Ordinance. This change will subject all oil and gas operations to the County's noise regulations, providing a new mechanism to manage noise impacts on surrounding communities.
5. General Plan Amendment: The Project amends multiple elements of the General Plan to reflect the new policy of phasing out oil and gas production. Revisions to Land Use, Conservation and Natural Resources, and Safety Elements will prohibit new oil well operations and remove land use designations and policies that support oil production activities, thereby ensuring the General Plan and Project are consistent.

3.6 PHASING AND IMPLEMENTATION

The Project is a regulatory program that will be implemented in phases following its adoption by the Board of Supervisors. The implementation framework is designed to provide a clear timeline for the immediate prohibition of new oil wells, establish a structured compliance period for existing operations, and ensure the final cessation and restoration of all sites at the end of a 20-year amortization period.

- Phase 1 - Immediate Implementation (Effective Date). Upon adoption, the following actions will become effective immediately, except within the Coastal Zone:
    - Prohibition on New Wells: The establishment of any new oil and gas wells or associated production facilities will be prohibited in all zones throughout the unincorporated areas of Los Angeles County.
    - Title 12 (Environmental Protection) Noise Ordinance Amendment (PDF-NOI-1): The amendments to the Noise Ordinance (Title 12) will become effective.
    - Commencement of Amortization Period: The 20-year amortization period for nonconforming oil and gas production facilities will commence.
    - Initial Performance Standards: Existing facilities will be subject to zoning enforcement action as specified in the Project's new ordinance and existing Title 22 regulations, including but not limited to:
        - Site Maintenance (PDF-AE-2): All facilities must be maintained in a neat and orderly condition, free of debris and weeds.
        - Lighting Standards (PDF-AE-3): All new permanent and temporary lighting to be minimal, shielded, and directed downward.
        - Decommissioning Mandate (PDF-LU-1): The requirement for well plugging, abandonment, and site restoration upon cessation of activities becomes mandatory.
        - Decommissioning and Infrastructure Removal (PDF-LU-2): The complete removal of all structures and equipment associated with the oil operation is required.

        - Cultural Assessment (PDF-TCR-1): The requirement to complete a Cultural Assessment, as detailed in the Project's new Title 22 ordinance, becomes mandatory.
        - Community Health, Safety, and Notification Plans (PDF-HAZ-2): Operators must prepare and submit a Community Health, Safety, and Notification Plan in the event of a zoning enforcement complaint.
- Phase 2 - Amortization and Compliance Period (Years 0-20). During this 20-year period, existing nonconforming oil and gas operations may continue, but must come into full compliance with all new performance standards (PDFs) according to a staggered schedule. The sites will be subject to compliance monitoring and enforcement throughout this period. Violations of the Project's performance standards will be subject to the County's code enforcement procedures, which may include notices of violation, administrative fines, and other legal remedies as provided for in the Los Angeles County Code. Operators may voluntarily choose to plug, abandon, and restore their well sites at any point during this phase. The schedule for compliance with key operational standards is as follows:
    - Within One Year of Effective Date. Operators must comply with requirements for:
        - Signage (PDF-AE-1): Clear site identification signage with operator and agency contact information must be installed.
        - Public Complaint Log (PDF-PS-1): A log to record and respond to public complaints must be maintained.
    - Within Two Years of Effective Date. Operators must comply with:
        - Financial Assurance (PDF-HAZ-1): Sufficient indemnity bonds must be posted to cover the full cost of well plugging and abandonment.
- Phase 3 - Final Cessation (End of Year 20). At the conclusion of the 20-year amortization period, the legal nonconforming status of all existing oil and gas operations will expire. All remaining operations must cease. Any facility not fully decommissioned by the end of the 20-year amortization period will be subject to abatement as a public nuisance, and the operator will be required to complete all well plugging, site remediation, and final restoration activities as mandated by the Project and other applicable laws.

3.7 PHYSICAL AND TECHNICAL CHARACTERISTICS OF DECOMMISSIONING

While the Project is fundamentally a regulatory action, its implementation mandates the physical decommissioning of oil and gas facilities. To ensure these activities are fully funded, operators must file an indemnity bond with the County of at least $152,000 per well. All well plugging and abandonment activities must fulfill California Geologic Energy Management Division (CalGEM) requirements. The physical and technical characteristics of this process generally occur in the following stages:

- Mobilization and Site Preparation: Decommissioning begins with the mobilization of heavy equipment to the well pad. This typically involves transporting workover rigs, cranes, flatbed trucks, and temporary portable tanks for managing well fluids during the sealing process.

Prior to and during this phase, operators must maintain strict site conditions, keeping the area within 25 feet of any facility free of dry weeds, brush, or combustible material.

- Well Plugging and Abandonment (P&A): The mechanical process of permanently sealing the wellbore is highly regulated to protect groundwater and isolate hydrocarbon zones. The process generally involves removing production tubing, cleaning out the wellbore, and pumping specialized cement into the well to create permanent barriers. The well casing is then cut off below the ground surface and capped with a welded steel plate. All CalGEM requirements related to the plugging and abandonment of a well must be fulfilled.
- Infrastructure and Equipment Removal: Following the sealing of the well, surface infrastructure is dismantled and removed. The Project requires that all equipment and pipelines not necessary for the operation or maintenance of other active oil wells or production facilities on the property be removed. Furthermore, any equipment used to repair, clean out, plug and abandon, or perform any other work on an existing well must be removed from the site within 90 days after the completion of those activities.
- Environmental Remediation and Soil Handling: Site cleanup involves the remediation of legacy contamination. The Project mandates that the well site or lease area be fully restored so that it is completely free of oil, rotary mud, oil-soaked earth, asphalt, tar, concrete, litter, and debris. This phase typically requires heavy earthmoving equipment, such as excavators and front-end loaders, to excavate impacted soils. This generates localized haul-truck traffic to export contaminated materials and import clean backfill.
- Final Site Restoration: The final phase returns the site to a safe, non-hazardous condition. Within 90 days after the abandonment of any well, the well site must be restored as nearly as practicable to its original condition. Specifically, restoration of the well site must be completed within 60 days following the plugging and abandonment of the well itself. In cases where the last oil well on a lot is plugged and abandoned, or the production facility is removed, restoration of the entire lot must begin within three months and be completed within one year after the plugging of that final well, unless CalGEM approves a longer timeline. The lot must be restored in compliance with CalGEM requirements and to the satisfaction of the Director of Regional Planning.

3.8 OPERATIONAL CHARACTERISTICS

The operational characteristics of the Project are the direct, long-term changes to environmental and land use conditions resulting from the new regulatory framework. Specifically, the operational conditions will be characterized by the following:

- Prohibition of New Oil and Gas Activities: The Project will result in the permanent absence of any new oil and gas exploration, drilling, or production activities. This is a direct outcome of the Project's prohibition on the establishment of new wells or facilities in any zone (except within the Coastal Zone).
- Strict Adherence to Enhanced Performance Standards: All remaining (amortizing) facilities will be legally required to operate in strict adherence to the comprehensive suite of new, mandatory performance standards (Project Design Features) established in the Ordinance. These standards create new enforceable requirements for noise control, site maintenance,

lighting, and public complaint response, thereby minimizing impacts during the phase-out period.

- Guaranteed Site Decommissioning and Restoration: The Project creates a mandate for the complete plugging of wells, abandonment of facilities, and restoration of all sites.
- Ongoing County Enforcement: The new regulations will be subject to ongoing enforcement by the County Department of Regional Planning and other relevant County, regional, and state agencies. This ensures that all operational standards and decommissioning requirements are met throughout the amortization period and beyond.

It is important to note that these operational characteristics describe the effects of the regulatory program itself. This EIR does not grant any entitlements for, or analyze the project-specific impacts of, any future redevelopment (e.g., residential or commercial) that may be proposed on these sites, nor does it analyze the site-specific, use-dependent remediation that would be required to facilitate such redevelopment. Subsequent proposals for specific development projects, including the tailored remediation plans required to achieve the necessary cleanup standards for those specific uses, will be subject to a separate, project-specific environmental review pursuant to CEQA at the time they are proposed.

3.9 DISCRETIONARY ACTIONS AND APPROVALS

The County of Los Angeles is the Lead Agency for the Project. Implementation of the Project requires the following primary discretionary actions by the County of Los Angeles Board of Supervisors:

- Certification of this Environmental Impact Report.
- Adoption of a Statement of Overriding Considerations.
- Adoption of a resolution to amend the County of Los Angeles General Plan.
- Adoption of an ordinance amending Title 12 (Environmental Protection) and Title 22 (Planning and Zoning, including the Baldwin Hills Community Standards District (CSD) and the Newhall Ranch Specific Plan) of the Los Angeles County Code.

3.10 INTENDED USES OF THE EIR

This Environmental Impact Report (EIR) has been prepared in accordance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3). The primary purpose of this EIR is to serve as an informational document for public agency decision makers and the public. It is intended to provide a comprehensive and objective analysis of the potential environmental effects of the proposed regulatory Project, to identify measures to mitigate significant adverse effects, and to present and evaluate a reasonable range of alternatives.

The County of Los Angeles is the Lead Agency for the Project and the Board of Supervisors will use this EIR to inform its decision-making when considering the adoption of the Project. This EIR may also be used by other public agencies that have jurisdictional responsibility over certain

aspects of the activities that would be regulated or prompted by the Project. These Responsible and Trustee Agencies may include, but are not limited to:

California Geologic Energy Management Division (CalGEM): Has regulatory authority over the technical plugging and abandonment of oil and gas wells.

South Coast Air Quality Management District (SCAQMD): Has permitting authority and regulatory oversight of stationary and mobile sources of air pollution.

Los Angeles Regional Water Quality Control Board (LARWQCB): Has regulatory authority over matters related to water quality, including stormwater discharges during decommissioning.

California Department of Fish and Wildlife (CDFW): Has trustee authority over the State's fish and wildlife resources and may have jurisdictional authority over activities affecting streams, lakes, and sensitive species.

3.10.1 Clarification on the Scope of Analysis Regarding Future Site-Specific Remediation and Redevelopment

This EIR analyzes the environmental impacts of the proposed regulatory program (the Project). This includes the prohibition of new oil wells, and the reasonably foreseeable environmental impacts associated with the physical decommissioning, plugging and abandonment, and baseline site remediation required by the Project to safely close the facilities.

However, this EIR does not analyze the project-specific impacts of any potential future redevelopment that may be proposed on these sites, nor does it analyze the advanced, site-specific remediation that would be required to accommodate those future uses. Pursuant to CEQA Guidelines Section 15124 and Section 15145, an EIR should not engage in speculation about future environmental effects. Analyzing the impacts of future redevelopment and use-dependent remediation on former oil sites at this stage would be highly speculative for several reasons:

No Concrete Proposals Exist: There are no specific redevelopment projects or tailored remediation plans proposed for any of the sites that would be decommissioned under this Project.

The Level of Remediation is Dictated by Unknown Future Uses: Environmental remediation standards are largely dictated by the specific future land use of a site. The extent of earthwork, soil hauling, and groundwater treatment required to clean a site to a residential standard is vastly different from the standard required for a commercial or open-space use. Because the ultimate land uses, densities, and site designs are unknown, the corresponding remediation requirements are also unknown.

Current Conditions are Not Fully Characterized: The specific, localized extent of surface and subsurface contamination at many of these sites will not be fully known until baseline decommissioning activities commence, making advanced, site-specific remediation plans impossible to formulate at this programmatic stage.

Timing is Uncertain: It is unknown when, or even if, remediation and/or development proposals for these parcels will emerge.

Attempting to analyze an infinite range of hypothetical development and use-dependent remediation scenarios would not produce a meaningful or useful analysis for decision makers or the public. Instead, the required CEQA process is to review specific development proposals—and their associated remediation plans—when they are formally submitted to the County. At that time, a separate, project-specific environmental review will be conducted based on the concrete details

of the proposal and the known site conditions. This EIR is not intended to be used as a first-tier document for the purpose of tiering the environmental review of subsequent redevelopment projects on these restored sites.

3.11 RELATIONSHIP TO EXISTING PLANS AND POLICIES

CEQA Guidelines Section 15125(d) requires that an EIR discuss any inconsistencies between a proposed project and applicable general plans, specific plans, and regional plans. This section provides an overview of the Project's relationship to key planning and policy documents. A more detailed consistency analysis is provided in Chapter 5.11, Land Use and Planning, of this EIR.

County of Los Angeles General Plan: The Project includes a General Plan Amendment specifically to ensure consistency between the County's primary land use policy document and the proposed ordinance. Currently, the General Plan contains some policies that could be interpreted as supporting continued oil and gas production. The proposed amendments to Land Use, Conservation and Natural Resources, and Safety Elements are designed to resolve these potential inconsistencies by explicitly prohibiting new oil operations and establishing a clear policy for phasing out existing operations. Therefore, upon adoption, the Project will be consistent with the General Plan.

Los Angeles County 2045 Climate Action Plan (CAP): The CAP, part of the General Plan, establishes the County's strategic framework for reducing greenhouse gas emissions and achieving carbon neutrality. The Project acts as a direct implementation of CAP Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). Because the Project executes a specific mandate of the CAP, this EIR tiers from the programmatic environmental impact analysis contained in the 2045 CAP Program EIR pursuant to CEQA Guidelines Section 15152, specifically relying on its findings regarding the balance of temporary decommissioning impacts against long-term environmental benefits.

City of Culver City General Plan: The unincorporated northwest portion of the Inglewood Oil Field is within the Sphere of Influence of the City of Culver City. The Project is consistent with the Culver City General Plan 2045 (adopted August 2024), which establishes a clear policy framework to phase out oil and gas extraction activities in the City-controlled portion of the Inglewood Oil Field. The General Plan explicitly incorporates the City’s Oil Termination Ordinance, mandating the termination of nonconforming oil and gas uses within the Culver City portion of the Inglewood Oil Field by November 2026. Additionally, Policy C-5.2 prioritizes coordination with the County to ensure compatibility between oil field activities and surrounding community uses during the transition. The Project’s goal of prohibiting new wells and phasing out existing production aligns with Culver City’s vision for environmental restoration and the eventual transformation of the oil field into open space.

OurCounty Sustainability Plan: This plan establishes a comprehensive vision for the future of Los Angeles County, with core goals focused on equity, environmental health, and economic resilience. The Project directly supports and implements numerous goals of the OurCounty plan, particularly Goal 1 ("A fossil fuel-free LA County"), Goal 2 ("Healthy and safe communities"), and Goal 7 ("Thriving ecosystems, habitats, and biodiversity"). By prohibiting new oil wells and phasing out existing ones, the Project is a key action in achieving the County's long-term sustainability and climate objectives.

SCAG Connect SoCal (2024-2050 Regional Transportation Plan/Sustainable Communities Strategy): While focused on transportation and land use, the regional plan for Southern California, prepared by the Southern California Association of Governments (SCAG), sets overarching goals for reducing greenhouse gas (GHG) emissions and improving public health,

particularly in environmental justice communities. The Project is consistent with these regional goals by contributing to the reduction of GHG emissions from fossil fuel extraction and by reducing public exposure to air contaminants and other hazards associated with oil operations. South Coast Air Quality Management Plan (AQMP): The AQMP for the South Coast Air Basin provides the framework for achieving federal and state ambient air quality standards. Oil and gas operations are sources of criteria air pollutants and toxic air contaminants. The Project supports the goals of the AQMP by preventing future emissions from new wells and by ensuring the eventual cessation of emissions from existing wells, thereby contributing to improved regional air quality. While Los Angeles County spans both the South Coast and Antelope Valley Air Basins, as discussed in Chapter 4, most existing oil and gas production facilities sit in the South Coast Air Basin.

- State of California Law and Policy: The Project aligns with the broader direction of State policy regarding climate change and public health. This includes statewide goals to achieve carbon neutrality and legislative efforts to increase protections for communities near oil and gas facilities (e.g., the policy goals underlying Senate Bill 1137). The Project represents a local implementation of these statewide public health and climate protection objectives.

CHAPTER 4 ENVORNMENTAL SETTING

This chapter describes the existing physical and regulatory environmental setting that serves as the baseline for evaluating the impacts of the Project. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15125(a), this baseline is defined as the physical environmental conditions in the vicinity of the project as they exist at the time the Notice of Preparation (NOP) was published. For this Project, the baseline specifically includes the existing oil and gas production facilities, their ongoing operations and associated environmental effects, and the surrounding land uses in the areas that would be affected by the Project. This description establishes the analytical starting point for *Chapter 5, Environmental Impact Analysis*.

4.1 REGIONAL AND LOCAL CONTEXT

The environmental setting of the Project encompasses a vast and diverse area. Los Angeles County is one of the nation's largest and most populous counties, covering approximately 4,083 square miles and including a 75-mile stretch of the Pacific Coast. The Project's regulations apply to the unincorporated areas of Los Angeles County, except the Coastal Zone, which total approximately 2,656 square miles and are home to over one million people. These unincorporated lands are subject to the land use authority of the County, unless controlled by state or federal government.

The Project Area contains a wide spectrum of landscapes, including dense urban neighborhoods, suburban and rural communities, and sensitive natural habitats. A key feature of this baseline environment is the presence of existing oil and gas operations often in close proximity to sensitive receptors such as homes, schools, and parks. As of April 2025, data from the California Geologic Energy Management Division (CalGEM) indicates that oil- and gas-related activity was identified on 337 unique parcels within the unincorporated areas. This infrastructure is categorized as follows: 248 parcels contain one or more active or idle oil and gas extraction wells, 25 parcels contain only ancillary wells, and 64 parcels contain only surface production facilities. These sites are widely distributed across 10 of the County's 11 Planning Areas, establishing the broad geographic scope and specific environmental context for the analysis of the Project. A detailed inventory of sites is included as Appendix A: Existing Conditions Site Inventory.

4.2 EXISTING REGULATORY FRAMEWORK

This section describes the existing regulatory framework governing oil and gas operations. Pursuant to CEQA Guidelines Section 15125(d), this discussion is necessary to identify the relationship between the Project and other applicable government plans and controls. It provides

context for the County's authority to regulate land use and demonstrates how the proposed regulations fit within the existing multi-jurisdictional system of oversight.

The regulation of oil and gas activities in unincorporated Los Angeles County is a complex, multi-layered system involving federal, state, regional, and local agencies. While many agencies regulate specific operational aspects (e.g., air emissions, well integrity), the County of Los Angeles acts as the lead agency for land use decisions. Through its zoning authority, the County determines the compatibility of oil and gas operations with surrounding communities and establishes the standards under which such land uses may operate or, as proposed by this Project, be phased out.

The following provides an overview of the key agencies and their primary roles.

- Federal Agencies: At the federal level, the U.S. Environmental Protection Agency (USEPA) establishes nationwide standards for air and water quality, and the Occupational Safety and Health Administration (OSHA) regulates worker safety.
- State Agencies:
    - California Department of Conservation Geologic Energy Management Division (CalGEM): The principal state agency regulating the drilling, operation, maintenance, and plugging and abandonment of oil and gas wells to protect public health and safety and prevent environmental damage.
    - California Air Resources Board (CARB): Sets statewide air quality standards and regulates greenhouse gas emissions.
    - State Water Resources Control Board (SWRCB) and the Los Angeles Regional Water Quality Control Board (LARWQCB): These agencies protect water quality by regulating waste discharges to land and water, including those from oil and gas operations.
    - Department of Toxic Substances Control (DTSC): Regulates the generation, handling, and disposal of hazardous waste.
- Regional and Local Agencies:
    - South Coast Air Quality Management District (SCAQMD): Develops and enforces air quality regulations for stationary sources of pollution (including oil wells and production equipment) within the South Coast Air Basin.
    - Los Angeles County Departments: Various County departments, including Public Works, Public Health, and the Fire Department (Health Hazardous Materials Division), have specific permitting and oversight roles related to grading, public health, and hazardous materials management. The Department of Regional Planning is responsible for implementing the County's land use and zoning regulations, which comprise the Project.

4.2.1 Federal Regulatory Framework

Federal laws establish a nationwide baseline for environmental protection and worker safety that applies to all oil and gas operations, including the decommissioning activities that the Project would require. The County's proposed regulations complement these federal requirements by using local land use authority to address issues not fully covered by federal statutes, such as proximity to sensitive receptors and long-term community character.

United States Environmental Protection Agency (EPA)

The EPA creates rules and enforces federal laws to protect human health and the environment. The following EPA-administered laws are directly relevant to the activities regulated and prompted by the Project:

Water Quality Protection (Clean Water Act & Oil Pollution Act): The Clean Water Act (CWA) regulates discharges into national waters. During decommissioning, this requires operators to manage stormwater runoff from construction sites, often through a Stormwater Pollution Prevention Plan (SWPPP). The CWA's Spill Prevention, Control, and Countermeasure (SPCC) rules also require facilities to maintain and implement detailed plans to prevent oil spills. The Oil Pollution Act (OPA), an amendment to the CWA, strengthens the EPA's enforcement authority and a facility's responsibility for contingency planning.

Waste Management (Resource Conservation and Recovery Act): The Resource Conservation and Recovery Act (RCRA) provides the "cradle-to-grave" framework for managing solid and hazardous waste. Decommissioning activities will generate various waste materials, including contaminated soils, drilling muds, and dismantled equipment, which must be characterized and disposed of according to RCRA standards. While certain exploration and production wastes are exempt from RCRA's most stringent hazardous waste rules, they are still regulated as solid waste.

Contaminated Site Cleanup (CERCLA/Superfund): The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) gives the EPA authority to manage the cleanup of sites contaminated with hazardous substances. CERCLA provides a critical backstop to ensure that legacy contamination at oil and gas sites is addressed, particularly if the responsible party is unable or unwilling to conduct the cleanup, aligning with the Project's goal of achieving baseline site remediation.

Occupational Safety and Health Administration (OSHA)

OSHA ensures safe and healthful working conditions for employees. All decommissioning activities prompted by the Project—from well plugging and equipment removal to earthmoving and site restoration—must be conducted in compliance with OSHA standards. These include regulations for the construction industry (29 CFR 1926) and general industry (29 CFR 1910), which cover hazard communication, personal protective equipment, and the safe operation of heavy machinery. The OSH Act's General Duty Clause broadly requires employers to provide a workplace free from recognized hazards that could cause death or serious physical harm.

4.2.2 State and Regional Regulatory Framework

While federal laws establish a baseline, the day-to-day regulation of oil and gas operations occurs at the state and regional levels. This framework establishes technical, safety, and environmental standards for how oil and gas activities are conducted. The Project works in concert with this framework by exercising its distinct land use authority to determine whether and for how long these activities may continue in unincorporated areas. The following describes the key state and regional agencies and rules that will govern the decommissioning process prompted by the Project.

California Geologic Energy Management Division (CalGEM)

As the state's regulator for oil and gas, CalGEM sets engineering, safety, and conservation standards for well operations statewide (Title 14, California Code of Regulations). Its regulations are designed to prevent waste, protect natural resources like groundwater, and ensure public health and safety. Requirements include:

Permitting and Well Integrity: Operators must obtain CalGEM approval for all drilling, reworking, and plugging operations. Regulations mandate specific standards for steel casing, cementing, drilling fluid management, and blowout prevention equipment to ensure well integrity and protect groundwater from contamination. For wells near sensitive sites ("critical wells"), additional safety devices are required.

Production Facility Management: Rules govern the maintenance, secondary containment, and inspection of all production facilities, including tanks and pipelines, to prevent leaks and spills. Operators must maintain a pipeline management plan and properly decommission any out-of-service facilities.

Idle Well Management: CalGEM has a comprehensive program for idle wells (those inactive for 24 months). Operators must conduct regular mechanical integrity testing (e.g., pressure tests) to ensure wells are not leaking or commit to a firm schedule for plugging and abandonment to prevent them from becoming environmental hazards.

Plugging, Abandonment, and Site Restoration: CalGEM prescribes technical requirements for placing cement plugs at specific depths to permanently isolate all oil, gas, and freshwater zones. After subsurface plugging, the surface must be cleared of all equipment and waste and restored to as near a natural state as practicable within 60 days. This state requirement directly aligns with the Project's mandatory decommissioning and site restoration performance standards (PDF-LU-1 and PDF-LU-2).

Financial Assurance: Operators must post bonds with CalGEM to cover the full estimated cost of well abandonment, facility decommissioning, and site remediation. This includes "life-of-well" bonds for operators with a history of non-compliance. These requirements ensure that taxpayers do not bear the financial burden of orphaned wells.

Underground Injection Control (UIC) and Well Stimulation: CalGEM administers the UIC program to regulate the underground injection of fluids for enhanced recovery or disposal, with a primary goal of protecting drinking water sources. As of October 1, 2024, CalGEM regulations prohibit Well Stimulation Treatments (e.g., hydraulic fracturing) statewide.

California Division of Occupational Safety and Health (Cal/OSHA)

As the state-plan counterpart to federal OSHA, Cal/OSHA enforces workplace safety and health regulations that are often stricter and more specific than the federal standards. For oil and gas operations, Cal/OSHA's role is critical for protecting on-site workers. Regulations include:

Process Safety Management (PSM) (Title 8, CCR Section 5189): This is a comprehensive program for facilities that handle large quantities of flammable liquids and gases, like oil fields. It requires operators to manage hazards through detailed process analysis, written operating procedures, employee training, and mechanical integrity checks on equipment.

Injury and Illness Prevention Program (IIPP): A foundational requirement for every California employer, the IIPP is a written, site-specific plan to identify and correct all workplace hazards.

Hazard Communication (HazCom): Requires operators to inform employees about hazardous chemicals they work with (e.g., hydrogen sulfide, benzene) through labels, Safety Data Sheets (SDSs), and training.

Specific Safety Standards: Cal/OSHA enforces numerous specific standards relevant to oil fields, including those for confined space entry, lockout/tagout procedures for machinery, fire prevention, and personal protective equipment (PPE).

California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD)

While Los Angeles County spans both the Antelope Valley and South Coast Air Basins, the Project Area is primarily located within the South Coast Air Basin (SCAB), an area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The SCAB's air pollution problems are a consequence of the combination of emissions from a large urban area, meteorological conditions that hinder dispersion, and surrounding mountainous terrain that traps pollutants.

CARB is the state agency responsible for protecting public health from air pollution and developing programs to fight climate change. The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations for stationary sources in the SCAB.

- Climate Change Scoping Plan: CARB is required to prepare a "scoping plan" for achieving the state's greenhouse gas (GHG) emission reduction goals. The 2022 Scoping Plan outlines the state's plan to reach carbon neutrality by 2045 or earlier. It identifies a new, more aggressive 2030 GHG reduction target of 48% below 1990 levels (compared to the statutory 40% goal) to ensure the state is on a path to meet the 2045 carbon neutrality goal. The Scoping Plan's strategies build on and accelerate existing programs, including moving to zero-emission transportation, phasing out natural gas for building heat, and replacing fossil-fuel fired electricity generation with renewable alternatives. The plan also emphasizes that there is no realistic path to carbon neutrality without carbon removal and sequestration, including both nature-based solutions and mechanical technologies like direct air capture.
- Air Quality Management Plan (AQMP): SCAQMD is required to adopt an AQMP demonstrating compliance with all federal and state ambient air quality standards. The AQMP is the regional blueprint for achieving clean air standards. The 2022 AQMP was developed to address the 2015 national ozone standard and builds upon previous plans by including a variety of additional strategies, such as regulation, accelerated deployment of cleaner technologies (e.g., zero-emission technologies), and best management practices.
- SCAQMD Rules: SCAQMD enforces a wide range of rules guided by the regional Air Quality Management Plan (AQMP). Key rules include:
  - Rule 402 (Nuisance): Prohibits the discharge of air contaminants that cause nuisance or injury to the public, often cited in response to odor complaints.
  - Rule 403 (Fugitive Dust): Controls particulate matter (dust) from blowing off-site during grading and other earth-moving activities.
  - Rule 1148.1 (Oil and Gas Production Wells): Requires monthly leak inspections using optical gas imaging cameras and establishes protocols for responding to odor complaints.

- Rule 1166 (Excavation of Contaminated Soil): Outlines safety requirements for any excavation or ground disturbance on potentially contaminated sites, requiring a permit and specific procedures for handling contaminated soil and mitigating dust. This rule is critical for the site decommissioning, remediation, and restoration phase of the Project.
- Rule 1173 (Fugitive VOC Leaks): Establishes a comprehensive Leak Detection and Repair (LDAR) program, requiring regular inspection and timely repair of thousands of individual components (valves, pumps, etc.).
- Rule 1176 (Wastewater Systems): Requires covers or other controls on sumps, drains, and separators to prevent VOC emissions.
- Permitting (Regulations XIII & XXX): Requires operators to obtain permits for new or modified equipment, use Best Available Control Technology (BACT), and, for major sources, consolidate all applicable air quality rules into a single, federally enforceable Title V permit.

State Water Resources Control Board and Los Angeles Regional Water Quality Control Board (LARWQCB)

The State Water Resources Control Board sets statewide policy to protect water quality by implementing the federal Clean Water Act and state Porter-Cologne Act, while the LARWQCB implements and enforces these policies locally. Their authority includes:
Basin Plan: The master planning document that sets water quality objectives for the region.
Waste Discharge Requirements (WDRs) and NPDES Permits: Regulates the discharge of waste (e.g., drilling muds, produced water) to land and surface waters, setting strict limits on pollutants.
Stormwater Management: Requires oil and gas facilities to be covered under the state's Industrial General Stormwater Permit, which mandates the implementation of a Stormwater Pollution Prevention Plan (SWPPP) to manage site runoff and prevent pollutants from entering the storm drain system.
Site Cleanup Orders: The LARWQCB can issue Cleanup and Abatement Orders (CAOs) to compel an operator to clean up any pollution caused by their facility, which is highly relevant to the Project.

Department of Toxic Substances Control (DTSC)

DTSC is a department of CalEPA that protects communities from toxic contamination. It oversees the remediation of contaminated land, water, and air under RCRA and CERCLA, and is a key agency in the cleanup of former industrial sites.

Southern California Association of Governments (SCAG)

SCAG is the federally recognized Metropolitan Planning Organization (MPO) for the six-county region that includes Los Angeles County. As a regional planning agency, SCAG is a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. As the region’s MPO, SCAG cooperates with SCAQMD, the California Department of Transportation (Caltrans), and other agencies to prepare regional planning documents. SCAG also serves as the regional clearinghouse for projects requiring environmental

documentation under federal and State law, reviewing proposed projects for their impacts on and consistency with regional planning programs.

Recent Complementary Statewide Legislation

Recent statewide legislation complements the Project and reinforces the County's sustainability and environmental justice efforts. Key legislation includes:
Senate Bill 1137 (2022): Establishes 3,200-foot health protection zones around sensitive receptors like residences, schools, and hospitals, prohibiting new oil and gas wells within these areas and imposing stricter monitoring and response standards on existing operations. While SB 1137 sets state-level restrictions based on proximity to sensitive receptors, the Project takes a broader approach by regulating all wells countywide in unincorporated areas.
Assembly Bill 1866 (2024): Increases fees for idle wells statewide and requires stricter Idle Well Management Plans (IWMPs) to compel operators to properly close and remediate wells in a timelier manner.
Assembly Bill 2716 (2024): Targets wells specifically within the Inglewood Oil Field, requiring all wells there to be closed and abandoned by December 31, 2030.
Assembly Bill 3233 (2024): Strengthens local authority by confirming the power of local governments to regulate or prohibit oil and gas operations via ordinance.

4.2.3 County of Los Angeles Regulatory Framework

While state and regional agencies set many operational standards, the County of Los Angeles exercises direct authority through its adopted plans and implementing ordinances. The Project is a comprehensive action designed to phase out oil and gas operations in unincorporated areas, pursuant to the authority granted to the County by AB 3233 (2024).

County Plans

High-level County plans provide the foundational vision for managing oil and gas operations in relation to community health, environmental protection, and climate goals:

- County of Los Angeles General Plan: Contains policies to ensure land use compatibility near mineral resource areas (LU 7.5), protect natural resources (C/NR 11.1), and assess public health and safety risks associated with oil and gas facilities (S 6.1). The 2045 Climate Action Plan (CAP), an element of the General Plan, establishes a primary strategy to "Decarbonize the Energy Supply" (Strategy 1), which includes Measure ES1 to develop a sunset strategy and phase out all oil and gas operations in unincorporated areas.
- OurCounty Sustainability Plan: Includes specific actions to expand setbacks for oil operations from sensitive uses (Action 2), develop a closure plan for abandoned and idled wells (Action 3), and collaborate on a regional sunset strategy (Action 84).

County Code Implementing Regulations

Specific, enforceable ordinances in the County Code govern the day-to-day aspects of oil and gas operations:

- Land Use and Zoning (Title 22): The County's Zoning Code is the primary tool for regulating land use. The Project would amend this Title to prohibit new wells and establish county-wide performance standards for existing wells, including signage, public complaint logs, site maintenance, and bonding.
- Building and Utility Codes (Titles 20, 26, 27, 28, 29, 31, 32): These codes establish minimum standards for all structures and utility systems. This includes requiring building and grading permits for construction and demolition (which must comply with erosion control and Low-Impact Development standards); ensuring electrical systems are safe for hazardous locations; managing industrial waste discharges to the sewer system; and providing adequate fire apparatus access and defensible space as required by the Fire Code (Title 32).
- Health and Safety Code (Title 11): This Title require that all hazardous machinery at a well be securely fenced (Ch. 11.46), that unused oil sumps be cleaned and removed (Ch. 11.48), and that all well openings be properly covered or secured to prevent accidents (Ch. 11.54).
- Environmental Protection Code (Title 12): This Title includes the County's Noise Control Ordinance (Ch. 12.08), which sets quantitative noise limits for stationary equipment, though it currently exempts the specific activities of drilling and reworking wells. The Project would amend this title to remove this exemption. It also includes the Stormwater and Runoff Pollution Control Ordinance (Ch. 12.80), which prohibits illicit discharges into the County's storm drain system.
- Highway and Traffic Codes (Titles 15 and 16): These codes govern work within the public right-of-way, requiring permits for any excavation or pipeline encroachment (Ch. 16.06). They also establish weight limits and parking restrictions for heavy commercial vehicles on designated highways, affecting the transport of equipment and materials (Ch. 15.48 and 15.64).

Location-Specific Overlay Regulations

Baldwin Hills Community Standards District (CSD): For the Inglewood Oil Field, the County has established a CSD (within the County Planning and Zoning Code, Title 22, Chapter 22.310), which is a zoning overlay (and associated Settlement Agreement) that imposes a layer of rules significantly more stringent than the general countywide requirements. Additional protections in the CSD include:

- Governance and Oversight: Establishes a Community Advisory Panel (CAP) for public input and requires the operator to fund an independent Environmental Compliance Coordinator to monitor day-to-day operations and report to the County.
- Operational Limits: Restricts the number of active drill rigs to two at any one time and caps the total number of new wells.
- Enhanced Environmental Standards: Requires a much deeper surface plug for abandoned wells (150 feet vs. the 25-foot state minimum); mandates comprehensive air and noise monitoring programs with specific shutdown thresholds (including a stricter nighttime noise limit); and requires annual high-precision GPS surveys to monitor ground subsidence and an on-site accelerometer to halt operations during a significant seismic event.

4.3 LAND USE AND PLANNING

This section describes the existing land use setting for the Project. The analysis of land use evaluates the physical arrangement and distribution of land uses, the compatibility between

different uses, and the relationship between existing conditions and the goals and policies of applicable land use plans. The environmental setting for land use provides the baseline for assessing the Project's potential to alter existing land use patterns or conflict with established land use plans and policies, as analyzed in *Chapter 5* of this EIR.

4.3.1 Existing Oil and Gas Operations

Oil production has been a significant component of the economic and physical landscape of Los Angeles County for over a century, shaping development patterns in many unincorporated communities. Existing operations encompass a range of industrial activities, including well drilling, ongoing production and maintenance, and the processing, temporary storage, and transportation of hydrocarbon fluids. The physical footprint of these operations is substantial. Modern drilling typically requires grading of a well pad and the installation of the drilling rig and ancillary equipment, with drilling often occurring 24 hours a day for approximately 10 to 30 days per well. Ongoing production activities involve surface infrastructure that may include wellheads (some equipped with pump jacks), storage tank batteries, heater-treaters for separating oil and water, compressors, and an extensive network of pipelines.

A critical characteristic of the existing land use setting is the proximity of many of these industrial oil and gas facilities to sensitive land uses. As defined by state agencies, including CARB and the Office of Environmental Health Hazard Assessment (OEHHA), sensitive receptors include residences, schools, daycare centers, parks, and healthcare facilities, whose occupants are considered more susceptible to the adverse effects of pollution and other hazards. The County's inventory of oil and gas facilities (*Appendix A* of this EIR) documents extensive land use interface issues, with wells and production equipment located on or immediately adjacent to properties containing single-family homes, apartment complexes, mobilehome parks, and schools, as well as within or bordering public parks and recreational areas. Furthermore, the inventory identifies numerous wells designated by CalGEM as "likely orphaned," which can pose distinct environmental, public safety, and aesthetic blight risks, creating persistent land use incompatibility even after operations have ceased. Addressing and mitigating these legacy conditions is a core objective of the Project's comprehensive decommissioning mandate. The geographic distribution of these land use conflicts is illustrated in figures in *Chapter 3* of this EIR.

The following provides an overview of the oil production history and land use context in each relevant County Planning Area where oil and gas facilities are present:

- Antelope Valley Planning Area: This expansive planning area is characterized by vast, open desert terrain with low-density rural residential and agricultural land uses. Oil production is limited. The few existing wells are in areas generally remote from urban centers, either near scattered rural residences or on public lands administered by the U.S. Forest Service (Angeles National Forest) or the California Department of Parks and Recreation (Hungry Valley State Vehicular Recreation Area).
- East San Gabriel Valley Planning Area: This area contains portions of the Whittier Oil Field, located within the Puente Hills. Sections of the Puente Hills are designated as Significant Ecological Areas (SEAs) in the County General Plan. Operations are located on hillside terrain immediately adjacent

to suburban communities such as Hacienda Heights and Rowland Heights, which are zoned primarily for residential and neighborhood commercial uses.

- Gateway Planning Area: While major oil fields in this region are largely within incorporated cities, active wells exist in unincorporated "islands." This includes wells accessing the Montebello and Dominguez Oil Fields, which are interspersed within a dense fabric of residential, commercial, industrial, and institutional land uses.
- Metro Planning Area: This urbanized planning area includes portions of the Dominguez Oil Field, the Howard Townsite Oil Field, and the Rosecrans Oil Field. Wells and production facilities are situated immediately adjacent to high-density residential neighborhoods, public schools, and major industrial and manufacturing facilities, representing a complex interface of potentially incompatible land uses.
- San Fernando Valley Planning Area: This area contains the Oat Mountain and Newhall Oil Fields. Operations are generally located in the Santa Susana Mountains to the north of the valley floor's dense suburban communities, including Porter Ranch and Granada Hills. This planning area also contains the Aliso Canyon Oil Field, which has been repurposed primarily for natural gas storage.
- Santa Clarita Valley Planning Area: This region has a long history of significant oil production, including within the Pico Canyon, Wiley Canyon, and Placerita Canyon Oil Fields. These legacy operations are now directly adjacent to expanding master-planned residential communities, commercial centers, open space preserves, and recreational facilities. The Newhall Ranch Specific Plan, a large-scale planned community, contains existing oil operations that are a subject of the Project's regulatory amendments.
- Santa Monica Mountains Planning Area: Valued for its significant scenic, recreational, and ecological resources, this planning area has limited oil production, located primarily along its northern foothills. These operations are in proximity to land designated for preservation as part of the Santa Monica Mountains National Recreation Area, State Parks, and local wildlife corridors.
- South Bay Planning Area: This area includes a portion of the vast Wilmington Oil Field, with wells located in the unincorporated community of West Carson. It also includes wells accessing the Torrance and Lawndale Oil Fields. These facilities are interspersed with a dense mix of single-family residences, apartment buildings, commercial strips, and industrial parks.
- West San Gabriel Valley Planning Area: This area includes the western extent of the Montebello Oil Field, which is now bordered by urban development. It also contains wells located within the Whittier Narrows Recreation Area, a major regional park managed by the County Department of Parks and Recreation.
- Westside Planning Area: This area is dominated by the Inglewood Oil Field, one of the largest urban oil fields in the United States. This field represents significant industrial use covering nearly 1,000 acres within a densely populated urban landscape, creating a distinct land use incompatibility that is specifically addressed by the Project. The field is immediately bordered by the communities of View Park-Windsor Hills, Baldwin Hills, and Ladera Heights, as well as the City of Culver City. The area also includes legacy wells in the Playa Del Rey (which has been converted to natural gas storage) and Sawtelle Oil Felds (co-located with the Veterans Affairs West Los Angeles Campus).

4.3.2 Existing Land Uses and Zoning

This section provides a more detailed examination of the existing land uses and underlying zoning designations for the parcels identified as containing active or idle oil and gas wells, ancillary wells, or production facilities. This analysis establishes a baseline understanding of existing land use

compatibility issues and provides the context for evaluating the physical impacts associated with the decommissioning and restoration activities that would be prompted by the Project. A comprehensive inventory of these parcels, including their Assessor's Identification Number (AIN), operator, well status, specific zoning, and General Plan land use designation, is provided for reference in *Appendix A* of this EIR. Tables 4.3-1 and 4.3-2 below summarize the land use context for the affected parcels. In this context, an "extraction well" is any oil & gas well on record with CalGEM, and "ancillary wells" include all other well types (e.g., injection/waterflood, water disposal, water source, core hole, dry hole, etc.) in CalGEM records. Wells are deemed idle when they have not been operational for a continuous period of 24 months, per State law. "Oil & gas facilities" refers to surface production facilities recorded in CalGEM records, such as tank farms, separators, pump, or other processing equipment.

TABLE 4.3-1: Planning Area Distribution

Planning Area	Parcels	Approximate Acres	Active Extraction Wells	Idle Extraction Wells	Active Ancillary Wells	Idle Ancillary Wells	Oil & Gas Facilities
Antelope Valley	10	1,747	0	3	0	7	0
East San Gabriel Valley	12	1,067	29	45	0	2	3
Gateway	56	898	13	54	0	3	5
Metro	81	199	35	32	6	3	42
San Fernando Valley	20	2,755	29	30	8	5	4
Santa Clarita Valley	71	10,319	91	165	6	25	39
Santa Monica Mountains	7	554	0	7	0	0	0
South Bay	47	122	5	17	3	9	41
West San Gabriel Valley	6	198	0	6	0	0	0
Westside	26	1,205	407	170	211	26	6

TABLE 4.3-2: Zoning Distribution

Zone Category	Parcels	Approximate Acres	Active Extraction Wells	Idle Extraction Wells	Active Ancillary Wells	Idle Ancillary Wells	Oil & Gas Facilities
A-2	91	8,594	444	275	187	54	36
SP	18	3,234	14	17	0	1	15
O-S	22	2,281	1	35	3	2	2
SP, R-1	1	1,480	0	4	0	0	1
A-1	18	1,150	40	49	0	5	4
W	3	729	0	2	0	1	0
A-2, A-1	3	350	0	3	0	0	0
IT, O-S, R-4	1	212	10	2	2	1	1
M-2	51	165	25	22	7	5	28
SP, A-2	1	158	6	7	0	0	1
C-M	2	108	0	1	0	0	1
O-S-P	1	78.2	0	1	0	0	0
R-4	36	74.1	0	36	0	0	0
M-1.5, A-2	1	73.6	49	25	32	3	1
R-3	3	73.1	3	7	1	1	2
R-1, RPD	2	70.2	1	3	0	0	1
R-1	49	61.5	5	21	0	3	31
RPD, R-1	1	43.8	1	0	0	0	1
R-C	1	36.7	0	1	0	0	0
M-1.5	11	36.0	5	4	2	1	9
M-1, B-1	1	13.3	0	1	0	0	0
M-2, M-1.5	1	9.47	1	0	0	0	0
A-1, A-2	1	8.02	0	2	0	0	0
C-3	2	7.47	0	2	0	2	2
M-1.5, B-1	4	6.94	3	1	0	0	1
M-1	2	5.22	1	0	0	0	1
R-2	5	1.96	0	5	0	0	0
C-2	1	1.31	0	1	0	1	1
C-2, W	1	0.88	0	0	0	0	1
R-A	2	0.72	0	2	0	0	0

Proximity to Residential Uses

A substantial number of the affected parcels are co-located or immediately adjacent to land designated and zoned for residential use. This represents the most significant land use compatibility challenge that the Project seeks to address. The interface between industrial oil operations and residential communities occurs across a range of densities. This includes low-density residential zones, such as R-1 (Single-Family Residence) and R-A (Residential Agricultural), in suburban communities like Rowland Heights, North Whittier, and West Athens-Westmont. It also includes high-density residential zones, such as R-3 (Limited Density Multiple Residence) and R-4 (Medium Density Multiple Residence), in more urbanized unincorporated areas within the Gateway and Metro Planning Areas. In several documented instances, wells are located within the common areas of multi-family condominium developments or on the grounds of large mobilehome parks.

Co-location with Institutional and Recreational Uses

Oil and gas infrastructure is also co-located with a variety of public, quasi-public, and private institutional and recreational land uses. These sensitive uses can host large populations, including children and other vulnerable individuals. Examples include wells located on the properties of the Los Angeles Adventist Academy in the Metro Planning Area and near the West Los Angeles VA Medical Center in the Westside Planning Area. Furthermore, numerous wells and associated production facilities are situated within major public parks, preserves, cemeteries, and recreational facilities. These include the Puente Hills Landfill Native Habitat Preserve, Rose Hills Memorial Park, Whittier Narrows Recreation Area, Castaic Sports Complex, and Kenneth Hahn State Recreation Area.

Integration with Commercial and Industrial Uses

In heavily industrialized corridors within the Metro, Gateway, and South Bay Planning Areas, oil wells are frequently co-located with active manufacturing, warehousing, and logistics facilities. These parcels are typically zoned for heavy industrial or commercial uses, such as M-2 (Heavy Manufacturing), M-1 (Light Manufacturing), or C-3 (General Commercial). Examples of this integration include oil wells operating within the same parcel as the Phillips 66 gasoline terminal and a Robertson's Ready-Mix concrete facility. While these industrial uses are more compatible with oil operations than residential uses are, the presence of oil wells can constrain future site development and poses distinct safety and hazardous materials risks.

Location within Open Space and Agricultural Lands

In the more rural and less developed portions of the County, such as the Santa Clarita Valley and the mountains above the San Fernando Valley, oil field operations are often situated on large parcels of land designated for rural living, open space, conservation, or agricultural use. The applicable zoning in these areas often includes A-2 (Heavy Agricultural), R-R (Resort and Recreation), and O-S (Open Space). In these settings, the primary land use conflicts relate to impacts on biological resources, scenic quality, recreational access, and compatibility with long-term conservation objectives.

4.4 MINERAL RESOURCES

This section describes the existing mineral resources in the Project Area. The discussion provides the environmental baseline for evaluating the potential for the Project 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, or that is designated on a local General Plan.

The County of Los Angeles General Plan is the primary local planning document that identifies and establishes policies for mineral resources. The Conservation and Natural Resources Element of the General Plan contains goals and policies intended to manage mineral resource extraction areas to ensure their continued viability while minimizing conflicts with other land uses. On the County's official Land Use Policy Map, several areas containing major oil fields, such as the Inglewood Oil Field, are assigned a specific "Mineral Resources" land use designation. This designation formally acknowledges the presence of a valuable resource and has historically guided land use planning to support its continued extraction. The Project represents a fundamental shift in this policy direction for oil and gas.

4.4.1 Existing Mineral Resources in the Project Area

Oil and Gas Resources

The primary and most significant mineral resources within the Project Area are crude oil and natural gas. As detailed in *Section 4.3, Land Use and Planning*, the unincorporated areas of Los Angeles County contain numerous major oil fields that have been among the most productive in California's history. These fields, primarily located in the Los Angeles Basin, have been a major component of the regional economy for more than a century.

The baseline condition is one in which these vast, non-renewable fossil fuel resources are actively being extracted and are considered available for continued and future extraction, subject to economic conditions and the existing regulatory framework. This resource is currently accessed via the parcels noted in *Section 4.3 Land Use and Planning* and *Appendix A* with active and idle oil and gas wells.

Other Mineral Resources

In addition to oil and gas, Los Angeles County contains other significant mineral resources, most notably large deposits of construction-grade aggregate (sand and gravel). These resources are heavily concentrated in areas such as the San Gabriel Valley and the Santa Clarita Valley. Many of these aggregate resource areas are officially designated by the State Geologist under the Surface Mining and Reclamation Act of 1975 (SMARA) as Mineral Resource Zones (MRZ-2). The Project is focused exclusively on the regulation of oil and gas extraction and would not affect the availability or accessibility of these sand and gravel or other non-fuel mineral resources.

4.5 AESTHETICS

This section describes the existing aesthetic and visual resources within the unincorporated areas of Los Angeles County that could be affected by the Project. For the purposes of this EIR, "aesthetics" refers to the public's perception and appreciation of the visual character and quality of the environment. The analysis of the aesthetic setting establishes the baseline for evaluating potential Project-related impacts, such as the degradation of visual character, obstruction of scenic vistas, or the introduction of new sources of light and glare.

4.5.1 Visual Character and Quality

The visual character of Los Angeles County is exceptionally diverse, encompassing a broad spectrum of built, natural, and interface environments. The County's varied topography, which includes coastal plains, alluvial fans, foothills, and prominent mountain ranges, creates a complex and dynamic visual setting. The baseline visual character is described below in the context of urbanized areas and natural open spaces where oil and gas facilities are present.

Urban and Suburban Settings

In the densely developed urban and suburban portions of the County, such as the Metro, Gateway, and South Bay planning areas, the visual character is defined by a mix of residential, commercial, and industrial land uses. Within this context, existing oil and gas production facilities introduce a distinctly industrial aesthetic. The visual elements of these facilities include wellheads, articulating pumpjacks, large above-ground storage tanks, processing equipment, and networks of pipelines, often secured by chain-link fences or block walls.

In communities like West Carson, View Park-Windsor Hills, and West Athens-Westmont, these industrial installations are often located directly adjacent to or within residential neighborhoods. The visual effect is a pronounced contrast between the industrial equipment and the surrounding residential architecture and landscaping. The perceived visual quality can be diminished by the age and condition of the equipment, visible rust or staining, and the general industrial nature of the sites, which can be perceived as a source of aesthetic blight by the surrounding community.

Natural and Open Space Settings

In the more rural and natural areas of the County, such as the Puente Hills, the foothills of the Santa Susana Mountains, and portions of the Santa Clarita Valley, the visual character is defined by natural landforms, native vegetation, and panoramic open space. Oil and gas facilities in these areas present a significant visual contrast to the surrounding natural landscape.

The development of well pads and access roads often requires substantial grading, creating artificial scarps and altering the natural contours of hillsides. The vertical and metallic forms of

drilling rigs, pumpjacks, and storage tanks disrupt the natural lines, colors, and textures of the surrounding environment. These facilities are often visible from public parks, trails, and viewpoints, detracting from the scenic quality of the natural open space and diminishing the recreational experience for visitors.

4.5.2 Scenic Resources

The County contains some officially designated scenic resources, as well as numerous informal public viewpoints that are highly valued by the public.

Scenic Highways

A highway may be designated as "scenic" by the state or a local government for its outstanding views of natural or man-made landscapes. Travel along these corridors is considered a recreational experience. There are two officially designated State Scenic Highways within unincorporated Los Angeles County:

- State Route 2 (Angeles Crest Highway): From 2.7 miles north of Interstate 210 to the San Bernardino County line.
- State Route 27 (Topanga Canyon State Scenic Highway): Beginning approximately one mile north of State Route 1 (Pacific Coast Highway) and continuing 2.5 miles to the unincorporated community of Fernwood.

In addition to these state-designated routes, the Los Angeles County General Plan and various community plans identify other local roadways as scenic corridors. While many of these routes are prized for their undeveloped views, the viewsheds from portions of these highways may include distant or foreground views of oil and gas infrastructure, which can detract from the overall scenic quality.

Scenic Vistas and Public Viewpoints

A scenic vista is generally defined as a long-range, high-quality view of a valued visual resource, available from a publicly accessible viewpoint. Within Los Angeles County, numerous such viewpoints offer panoramic views that can include oil and gas fields. Examples include:

- Kenneth Hahn State Recreation Area: Offers expansive panoramic views of the Los Angeles Basin, with the Inglewood Oil Field being a feature in the foreground from some viewpoints.
- Puente Hills and Whittier Hills: Publicly accessible hiking and equestrian trails within the Puente Hills Preserve offer views overlooking the Whittier Oil Field and its relationship to the surrounding suburban communities.
- Santa Susana and Santa Monica Mountains: Viewpoints from trails and roads in these mountain ranges provide long-range views of the Santa Clarita and San Fernando Valleys, which may include visible oil and gas operations.

4.5.3 Existing Light and Glare

Existing sources of light and glare in the Project Area include ambient light from urban development, vehicle headlights, and specific lighting associated with oil and gas facilities.

Nighttime Lighting

Many oil and gas facilities operate 24 hours a day and require artificial lighting for security and operational purposes. This typically consists of stationary, pole-mounted lights that illuminate wellheads, tank batteries, and processing areas. In older facilities, this lighting may be unshielded and inefficient, casting light upwards into the night sky and contributing to regional skyglow. This lighting can also result in light trespass, where light spills onto adjacent properties, particularly in residential areas like West Carson and near the Baldwin Hills, potentially creating a nuisance for nearby residents.

Glare

Glare is a bright, intense light that can cause discomfort or visual impairment. Existing sources of glare from oil facilities include:

- Daytime Glare: Caused by sunlight reflecting off metallic surfaces such as storage tanks, pipelines, and equipment housings.
- Nighttime Glare: Caused by poorly shielded or improperly aimed security lighting that shines directly into the eyes of observers on adjacent properties or roadways.
- Temporary Operational Lighting: During intermittent drilling, well servicing, or major maintenance activities, operators utilize high-intensity, temporary lighting towers to illuminate the work area for 24-hour operations. This lighting is a significant source of intense, localized light and glare that can be highly disruptive to adjacent residential areas for the duration of the work.

4.6 AIR QUALITY

This section describes the existing air quality setting in the South Coast Air Basin (SCAB), the air basin in which the Project is primarily located. The discussion includes a description of the regional climate and meteorology, the primary air pollutants of concern, the region's attainment status with respect to federal and state ambient air quality standards, and the types of existing emission sources and sensitive receptors within the Project Area. This information provides the necessary baseline for evaluating the Project's potential air quality impacts as presented in *Chapter 5* of this EIR.

4.6.1 Climate and Meteorology

The climate and meteorology of the Los Angeles region are primary factors influencing the dispersion and concentration of air pollutants. The SCAB is characterized by a Mediterranean-type

climate with warm, dry summers and mild, relatively wet winters. The most significant meteorological feature affecting air quality is the persistent temperature inversion layer created by the Eastern Pacific High-Pressure System.

This strong subtropical high-pressure cell, which is dominant during the summer and fall, creates a layer of warm, dry air that descends and sits atop a cooler layer of marine air. This inversion layer acts as a lid, trapping pollutants generated by sources at ground level and preventing them from dispersing vertically into the upper atmosphere. The region's topography, with the San Gabriel, San Bernardino, and San Jacinto Mountains forming a barrier to the north and east, further restricts the horizontal movement of pollutants, allowing them to accumulate to unhealthful levels. Land and sea breeze circulation patterns can transport pollutants inland during the day, where they react in sunlight to form secondary pollutants like ozone, and then transport them back toward the coast at night.

4.6.2 Air Pollutants of Concern

Air pollutants are broadly categorized as criteria air pollutants, for which ambient air quality standards have been established, and toxic air contaminants. Oil and gas operations are also a source of greenhouse gases (GHGs), which are discussed in detail in *Section 5.8, Greenhouse Gas Emissions*.

Criteria Air Pollutants

Criteria air pollutants are those for which the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively, to protect public health and welfare. The primary criteria pollutants of concern in the SCAB and relevant to oil and gas operations are:

Ozone (O3): A colorless, toxic gas that is the primary component of smog. Ozone is not emitted directly but is formed through a photochemical reaction in the atmosphere between volatile organic compounds (VOCs) and oxides of nitrogen (NOx) in the presence of sunlight. Oil and gas operations are a source of both NOx (from engine combustion) and VOCs (from fugitive emissions and combustion).

Particulate Matter (PM10 and PM2.5): A complex mixture of solid particles and liquid droplets suspended in the air. PM10 refers to particles with a diameter of 10 micrometers or less, while PM2.5 (fine particulate matter) refers to particles 2.5 micrometers or less. Sources related to oil operations include diesel particulate matter from engines, dust from roads and construction, and aerosols formed from combustion gases.

Volatile Organic Compounds (VOCs): Gaseous compounds that are precursors to ozone formation. They are emitted from the incomplete combustion of fuels and as fugitive emissions (leaks) from the processing, storage, and transport of petroleum products.

Oxides of Nitrogen (NOx): A family of gaseous compounds that are also precursors to ozone and particulate matter formation. NOx is primarily formed during high-temperature combustion, such as in internal combustion engines used to power pumps and other equipment at oil facilities.

Carbon Monoxide (CO): A colorless, odorless gas formed from the incomplete combustion of fossil fuels.

Toxic Air Contaminants (TACs)

Toxic Air Contaminants (TACs) are pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. Oil and gas production and processing can release several TACs, including:

- Benzene: A component of crude oil and a known human carcinogen.
- Toluene, Ethylbenzene, and Xylenes: A group of VOCs commonly found with benzene in petroleum products. Along with benzene, these VOCs are known as BTEX.
- Formaldehyde and Acetaldehyde: Byproducts of fuel combustion in engines.
- Hydrogen Sulfide (H2S): A gas with a characteristic "rotten egg" odor that can be present in crude oil and natural gas.

4.6.3 Existing Ambient Air Quality and Attainment Status

The SCAQMD maintains a network of air quality monitoring stations throughout the SCAB. Based on monitoring data from these stations, the SCAB is designated as a nonattainment area for several criteria pollutants. An area is designated as "nonattainment" if it violates state or federal air quality standards for a specific pollutant. Table 4.6-1 summarizes the SCAB's attainment status

TABLE 4.6-1: South Coast Air Basin Attainment Status

Pollutant	Federal Standard (NAAQS)	State Standard (CAAQS)
Ozone (O3)	Nonattainment (Extreme)	Nonattainment
PM2.5	Nonattainment (Serious)	Nonattainment
PM10	Attainment (Maintenance Area)	Nonattainment
Carbon Monoxide (CO)	Attainment (Maintenance Area)	Attainment
Nitrogen Dioxide (NO2)	Attainment/Unclassifiable	Attainment
Sulfur Dioxide (SO2)	Attainment/Unclassifiable	Attainment
Lead	Attainment/Unclassifiable	Attainment

Source: U.S. EPA's Green Book and the SCAQMD's "NAAQS/CAAQS and Attainment Status for South Coast Air Basin" publication, 2025.

4.6.4 Existing Emission Sources

The existing oil and gas facilities that are the subject of this Project are sources of criteria air pollutants and TACs. Emissions originate from a variety of equipment and activities:
Fugitive Emissions: Leaks of VOCs and methane from thousands of individual components, including wellheads, valves, connectors, pumps, compressors, and pressure relief devices. Emissions also occur from storage tanks through venting and working/breathing losses.
Stationary Source Combustion Emissions: Exhaust emissions (NOx, CO, VOCs, PM2.5) from stationary sources such as internal combustion engines used to power pumps, compressors, and other equipment, as well as from heaters, boilers, and flares.
Mobile Source Emissions: Exhaust emissions from heavy-duty diesel trucks used to transport crude oil, produced water, and equipment to and from sites.

Well Servicing and Drilling: Intermittent but intensive emissions from diesel engines on workover rigs, well-servicing equipment, and drilling rigs.

4.6.5 Sensitive Receptors

As discussed in *Section 4.3, Land Use and Planning*, a defining characteristic of the Project Area is the proximity of these emission sources to sensitive receptors. These include schools, hospitals, daycare centers, parks, and residential neighborhoods. For example, wells in the Westside Planning Area are adjacent to residential communities in View Park-Windsor Hills and Ladera Heights, while wells in West Carson are interspersed with homes, mobilehome parks, and schools. The location of these receptors in relation to existing oil field emissions is a key consideration for the environmental baseline.

4.7 BIOLOGICAL RESOURCES

This section describes the existing biological resources within the unincorporated areas of Los Angeles County and identifies those that could be affected by the Project. Biological resources include native plant and animal species and the habitats and ecosystems that support them. This section describes the regional biological setting and the sensitive habitats and special-status species known to occur or with the potential to occur in the Project Area. The information presented herein establishes the baseline conditions for the impact analysis in *Chapter 5*. The information is based on a review of existing literature and searches of the California Natural Diversity Database (CNDDB), the California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, and U.S. Fish and Wildlife Service (USFWS) data for the relevant USGS 7.5-minute quadrangles.

4.7.1 Regional Biological Setting

Los Angeles County is located within the California Floristic Province, a globally recognized biodiversity hotspot. The County's diverse topography, which ranges from sea level to over 10,000 feet at Mount San Antonio, has produced a wide variety of ecosystems, including coastal dunes and wetlands, coastal sage scrub, chaparral, oak woodlands, riparian forests, montane coniferous forests, and high desert. This ecological diversity supports more than 4,000 distinct species of plants and animals, including at least 52 species considered endangered by resource agencies.

Many existing oil and gas facilities are located within or adjacent to large, intact blocks of habitat that have significant biological value. These include, but are not limited to, the Puente Hills Landfill Native Habitat Preserve, the Santa Monica Mountains National Recreation Area, Malibu Creek State Park, the Angeles National Forest, and the Ballona Wetlands Ecological Reserve.

4.7.2 Sensitive Biological Resources in the Project Area

For the purposes of this EIR, sensitive biological resources include special-status species and sensitive natural communities. The decommissioning and restoration activities prompted by the Project have the potential to affect these resources.

Sensitive Natural Communities

Sensitive natural communities are those that are of limited distribution statewide or within a county or region and are often vulnerable to loss or degradation. The CNDDB tracks such communities, and the California Department of Fish and Wildlife (CDFW) gives them the highest inventory priority. Sensitive communities known to occur in or near existing oil field operations include:

- Coastal Sage Scrub: A shrub-dominated community found in coastal areas and inland valleys. It provides critical habitat for numerous sensitive species, most notably the coastal California gnatcatcher. Large stands of this community are present in the hills of the Santa Clarita Valley, Puente Hills, and Santa Monica Mountains.
- Chaparral: A fire-adapted shrubland community widespread in the mountains and foothills. It supports a diverse array of wildlife and can contain sensitive plant species.
- Riparian Woodlands and Scrub: These communities are found along rivers and streams and are characterized by water-loving trees and shrubs like cottonwoods, willows, and sycamores. They are among the most valuable and threatened habitats in Southern California, providing essential resources for a wide variety of wildlife.
- Wetlands and Vernal Pools: Areas such as the Ballona Wetlands Ecological Reserve contain coastal salt marsh and other wetland habitats. Vernal pools, though rare, are seasonally flooded depressions that can support unique and highly adapted plant and animal species.

Special-Status Species

Special-status species are plants and animals that are legally protected under the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), or other regulations, and species that are considered sufficiently rare by the scientific community to warrant consideration in this analysis. The following is a summary of special-status species with the potential to occur in the vicinity of oil and gas facilities.

- Special-Status Plants: Based on CNDDB and CNPS records, numerous special-status plant species have the potential to occur in the types of habitats found near oil fields. Examples include Braunton's milk-vetch (Astragalus brauntonii), slender-horned spineflower (Dodecahema leptoceras), and many-stemmed dudleya (Dudleya multicaulis), which are associated with the chaparral and coastal sage scrub habitats of the local mountains.
- Special-Status Wildlife:
    - Birds: The coastal sage scrub near many oil fields provides habitat for the federally listed Threatened coastal California gnatcatcher (Polioptila californica californica). Riparian areas provide habitat for the state and federally listed Endangered least Bell's vireo (Vireo bellii pusillus). Other sensitive bird species with potential to occur include the cactus wren, loggerhead shrike, and various raptors such as the Cooper's hawk, which may nest in trees on or near operational sites.
    - Reptiles and Amphibians: The federally listed Endangered arroyo toad (Anaxyrus californicus) can be found in the sandy riparian areas of the local mountains. The coast

horned lizard (Phrynosoma blainvillii), a California Species of Special Concern, may be found in sandy or loose soils within scrub habitats.

- Mammals: Several bat species, which are California Species of Special Concern, may use trees, rock crevices, or structures on oil field sites for roosting. The San Diego black-tailed jackrabbit and American badger are also species of concern with potential to occur in more open, undeveloped areas.

Wildlife Corridors and Linkages

Wildlife corridors are areas of habitat that connect larger blocks of habitat, allowing for the movement of animals and the flow of genetic material between populations. The fragmentation or destruction of these corridors can lead to genetic isolation and population decline. Several existing oil fields are located within or adjacent to critical regional wildlife linkages, including the Puente-Chino Hills Wildlife Corridor, the linkage between the Santa Monica and Santa Susana Mountains, and the connection between the Sierra Madre and San Gabriel Mountains. The physical presence of oil field infrastructure, including access roads, fencing, and operational activity, can impede or constrain wildlife movement through these vital corridors. Conversely, some species may use the passages created by oil field infrastructure as movement corridors.

4.8 CULTURAL AND TRIBAL CULTURAL RESOURCES

This section describes the cultural resources setting for the Project Area, which includes prehistoric, historic, archaeological, and tribal cultural resources. This setting provides the baseline for determining the potential for decommissioning and restoration activities to cause a substantial adverse change in the significance of such resources. The information presented is based on a review of existing historical literature and the results of a confidential cultural resources records search conducted at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System.

4.8.1 Cultural Setting

The archaeological record of the Los Angeles Basin indicates continuous human occupation spanning at least the last 10,000 years. At the time of Spanish contact in the 18th century, the Project Area was inhabited by several distinct linguistic groups. Most of the Los Angeles Basin was and is still occupied by the Gabrielino (Tongva) people. The northwestern portion of the County, including the Santa Clarita Valley, was and is still occupied by the Fernandeño (Tataviam), while the Santa Monica Mountains were and still are the home to the Chumash. These groups had complex societies with extensive trade networks and established villages, resource gathering areas, and sacred sites throughout the region. The Native American Heritage Commission (NAHC) has identified 24 tribes with traditional lands or cultural places within the unincorporated areas of Los Angeles County. For example, through formal government-to-government consultation for this Project, the Gabrieleno Band of Mission Indians – Kizh Nation identified deep ancestral ties to the Baldwin Hills region, noting its historical use as a highland passage,

ceremonial hub, and a vital source of natural tar (bitumen) for waterproofing traditional plank boats (ti'ats).

Historical-Era Setting

During the Spanish (1769–1821) and Mexican periods (1821–1848), the region was characterized by large cattle ranchos. Following American annexation and statehood (1848–present), the County began to urbanize, a process that was dramatically accelerated by the discovery and exploitation of vast petroleum reserves.

The history of oil production is a defining theme of the region's industrial development. After the first commercially successful oil well in the western United States was drilled at Pico Canyon in the Santa Clarita Valley in 1876, major oil booms in the early 20th century transformed the landscape. Oil fields such as Whittier (discovered 1897), Montebello (1917), Dominguez (1923), and Inglewood (1924) were instrumental in the economic growth of the region. This history is physically reflected in the existing built environment, and infrastructure associated with these historic fields could itself be considered a potential historic resource.

4.8.2 Known and Potential Resources in the Project Area

Records Search Results

A records search conducted at the SCCIC indicates that numerous cultural resources studies have been previously conducted and hundreds of prehistoric and historical-era resources have been recorded within unincorporated areas. Recorded prehistoric resources include village sites, temporary camps, rock shelters, and artifact scatters. Recorded historical-era resources are primarily related to ranching, agriculture, and early infrastructure. The records search also indicates that many of the existing oil fields were developed in areas with a high sensitivity for containing buried, undiscovered archaeological deposits.

Archaeological and Tribal Cultural Resources

Based on the ethnographic setting and the results of the records search, there is a high potential for ground-disturbing activities associated with well decommissioning and site restoration to encounter previously unrecorded archaeological resources. These could include buried deposits of artifacts (e.g., stone tools, shell beads), human remains, or soil features (e.g., hearths).

Pursuant to AB 52 and SB 18, the County has notified culturally affiliated Native American tribes of the Project and has initiated government-to-government consultation. Through this consultation process, tribes may identify specific locations, features, or broader cultural landscapes that they consider to be Tribal Cultural Resources. The results of this consultation are confidential but will be used to inform the impact analysis and develop appropriate project design features.

Built-Environment Historic Resources

Under CEQA, buildings, structures, and objects over 45 years of age may be considered potential historic resources if they meet certain criteria of significance. Much of the infrastructure within the County's older oil fields dates to the first half of the 20th century and could therefore warrant evaluation. Potential historical-era resources associated with the oil industry include:

- Historic Wellheads and Equipment: Early or unique examples of drilling and production technology, such as certain types of wooden derricks (though none are known to remain in the County), early pumpjack designs, or specific well-completion infrastructure. Well No. 4 at the Pico Canyon Oil Field, discussed below, is an example of such a resource.
- Ancillary Buildings and Structures: Historic field offices, workshops, pump houses, or other structures associated with the early operation of a field.

It is of significant note that the unincorporated County contains one designated National Historic Landmark, which is directly related to the oil industry: Pico Well No. 4, located in the Pico Canyon Oil Field. This site, located approximately 9.5 miles north of the community of San Fernando, is recognized as the first commercially successful oil well in California, cementing its statewide and national significance. The site is also designated as a California Historical Landmark (CHL).

4.9 GEOLOGY, SOILS, AND PALEONTOLOGY

This section describes the existing geological, soil, and paleontological resource conditions in the Project Area. The discussion provides the baseline for evaluating potential impacts from the Project, including exposure of people or structures to seismic and other geologic hazards, soil erosion, and the potential disturbance of unique paleontological resources during decommissioning activities.

4.9.1 Geologic and Soils Setting

Regional Geology and Topography

The Project Area is situated within two major geologic provinces: the Transverse Ranges and the Peninsular Ranges. Most of the oil fields are located within the Los Angeles Basin, a deep sedimentary basin at the northern end of the Peninsular Ranges province. The northwestern part of the County, including the Santa Clarita Valley, is within the Ventura Basin, part of the Transverse Ranges province.

Both basins are filled with thousands of feet of Cenozoic-era (66 million years ago to present) marine and non-marine sedimentary rock layers. These formations, which were deposited in deep ocean environments that later shallowed, are the source and reservoir rocks for the region’s vast oil and gas deposits. Key oil-bearing geologic formations include the Puente Formation (in the eastern Los Angeles Basin), the Repetto and Pico Formations (in the central and western Los Angeles Basin), and the Modelo Formation (in the Santa Clarita and San Fernando Valleys). As

described in *Section 4.9.3*, below, these same formations are also rich in paleontological resources.

The topography of the Project Area is highly varied, ranging from the flat, low-lying coastal plains of the Los Angeles Basin to the steep, rolling hills of the Puente Hills, Baldwin Hills, and the rugged Santa Susana and Santa Monica Mountains.

Soils

Soils in the flat-lying portions of the Project Area generally consist of deep, alluvial soils deposited by the Los Angeles, San Gabriel, and Santa Ana Rivers. In the hillside areas, soils are typically thinner, less developed residual soils formed from the weathering of the underlying bedrock. These hillside soils are often highly susceptible to erosion, particularly where vegetation has been removed or burned.

4.9.2 Geologic Hazards

The Southern California region is one of the most seismically active areas in the United States, prone to a variety of seismic hazards:
Fault Rupture: Numerous active and potentially active faults traverse the County. Several major oil fields are located directly on or adjacent to significant fault zones. For example, the Inglewood Oil Field is situated along the Newport-Inglewood Fault Zone, and the Whittier Oil Field is associated with the Whittier Fault. Other major active faults in the region include the San Andreas, Hollywood, Raymond, and Santa Monica faults.
Ground Shaking: The entire Project Area is subject to intense ground shaking from earthquakes on these and other regional faults. The intensity of shaking at any given site depends on its distance from the earthquake epicenter, the magnitude and depth of the earthquake, and local soil conditions.
Liquefaction: This phenomenon occurs when water-saturated, loose, sandy soils lose their strength and behave like a liquid during strong ground shaking. The areas most susceptible to liquefaction are the low-lying coastal plains and river floodplains, which include portions of the Wilmington and other oil fields.

Portions of the County are also prone to stability hazards:
Landslides: Many of the County's oil fields are in hillside areas with moderate to steep slopes, including the Baldwin Hills, Puente Hills, and the mountains bordering the Santa Clarita and San Fernando Valleys. These areas are susceptible to landslides, mudflows, and debris flows, particularly during periods of intense rainfall or strong earthquake shaking.
Oil-Induced Subsidence: The large-scale withdrawal of underground fluids (oil, gas, and water) can cause the ground surface to sink or "subside." This has been a significant historical issue in some local fields, such as the Wilmington Oil Field. Subsidence is now typically managed through fluid reinjection programs that replace the volume of withdrawn liquids.

4.9.3 Paleontological Resources

Paleontological Sensitivity

Paleontological resources (fossils) are the remains or traces of prehistoric life. The Cenozoic marine sedimentary formations that are the source of the region's oil are considered to have high paleontological sensitivity. These rock units, such as the Puente, Repetto, Pico, and Modelo Formations, are known to contain a rich and scientifically significant fossil record.

Commonly recovered fossils include marine invertebrates such as mollusks, gastropods, and echinoderms. Of scientific importance are the abundant marine vertebrate fossils, including numerous species of sharks, bony fish, and marine mammals such as whales, dolphins, and sea lions. The Baldwin Hills, location of the Inglewood Oil Field, are a world-renowned fossil locality, having produced thousands of exquisitely preserved marine fossils.

Because oil and gas facilities are located within these highly sensitive geologic formations, ground-disturbing activities associated with well decommissioning and site restoration (e.g., excavation for pipeline removal, grading for site restoration) have the potential to encounter and damage these non-renewable scientific and cultural resources.

4.10 GREENHOUSE GAS EMISSIONS

This section provides a summary of the science of global climate change and a description of existing GHG emissions from oil and gas operations that would be subject to the Project. This information establishes the environmental baseline for the GHG analysis presented in *Chapter 5* of this EIR.

4.10.1 Global Climate Change

Climate change is a long-term shift in global or regional climate patterns. The term is often used to refer to the rise in average global temperatures since the mid-20th century and the corresponding changes in the climate system. The scientific consensus, as established by the Intergovernmental Panel on Climate Change (IPCC) and other leading scientific bodies, is that the current warming trend is extremely likely to be the result of human activity since the Industrial Revolution.

The mechanism behind this warming is known as the greenhouse effect. Certain gases in the atmosphere, known as greenhouse gases, absorb and trap infrared radiation (heat) that is re-radiated from the Earth's surface, thereby warming the lower atmosphere. While the greenhouse effect is a naturally occurring phenomenon that makes life on Earth possible, the anthropogenic increase in the concentration of these gases has enhanced the effect, leading to global warming and climate change. The primary GHGs attributable to human activity include:
Carbon Dioxide (CO2): The most abundant anthropogenic GHG, released primarily through the combustion of fossil fuels (coal, oil, and natural gas).
Methane (CH4): A potent GHG with a much higher heat-trapping capacity than CO2 over a shorter time frame. It is the primary component of natural gas and is released through fugitive emissions from oil and gas systems, as well as from sources like landfills and agriculture.
Nitrous Oxide (N2O): Primarily emitted from agricultural and industrial activities.

Fluorinated Gases: A group of powerful synthetic GHGs emitted from a variety of industrial processes.

Potential adverse effects of climate change in California include sea-level rise, increased risk and intensity of wildfires, more frequent and severe heat waves, changes in precipitation patterns leading to more extreme droughts and floods and impacts on public health and ecosystems.

4.10.2 Existing Greenhouse Gas Emissions from Project Area Facilities

The existing oil and gas facilities subject to the Project are known sources of anthropogenic GHG emissions. However, for the purposes of this program-level EIR, establishing a precise, quantitative, aggregated emissions inventory for all facilities is considered speculative. Pursuant to CEQA Guidelines Section 15145, an EIR should not engage in speculation about environmental effects; therefore, this EIR establishes the baseline through a qualitative description of the emission-generating activities and sources. Emissions from oil and gas production operations are inherently variable and lack consistent, publicly available, real-time data for every source. Factors contributing to this variability include:

Operational Fluctuations: Emissions are not constant. They are directly related to the daily rate of oil, gas, and water production, which can fluctuate based on market conditions, maintenance schedules, and reservoir dynamics.

Equipment Type and Condition: The age, make, and maintenance status of the equipment at each facility vary widely. Newer, well-maintained equipment may have lower emission rates than older, less efficient equipment.

Intermittent Activities: High-emission events, such as well workovers, drilling, or venting, are intermittent and not representative of day-to-day operations, making daily or annual averages difficult to establish accurately.

Therefore, this EIR establishes the baseline for GHG emissions through a qualitative description of the emission-generating activities and sources that the Project would phase out over time. The primary sources of GHG emissions from the existing facilities are as follows:

Fugitive Methane (CH_4) Emissions: Methane is a potent GHG, and its unintentional release (fugitive emissions) represents a significant component of the baseline. These emissions originate from leaks in thousands of individual components across facilities, including wellheads, valves, connectors, seals, compressors, and pressure relief devices. Emissions also occur through venting and working/breathing losses from storage tanks that hold crude oil and other production fluids. The rate of these fugitive emissions is highly variable and depends on equipment condition and maintenance practices at each specific site.

Stationary Combustion (CO_2) Emissions: Carbon dioxide is emitted from the on-site combustion of fossil fuels (typically natural gas or diesel) to power operations. Sources include internal combustion engines used to run pumps and compressors, as well as heaters, boilers, and other process equipment used to treat and separate produced fluids. The volume of these emissions is directly dependent on the fuel consumption and operational up-time of this equipment at each facility.

Mobile Source (CO_2) Emissions: The operation and maintenance of oil and gas facilities require the use of heavy-duty vehicles. Emissions of CO_2 are generated by diesel trucks used to transport crude oil, produced water, chemicals, and heavy equipment to and from the sites. The

frequency and duration of this truck traffic vary based on production levels and maintenance needs.

The impact analysis in *Chapter 5* will assess the effect of the Project based on the eventual elimination of these described emission sources from the unincorporated areas of Los Angeles County.

4.11 HAZARDS AND HAZARDOUS MATERIALS

This section describes the existing conditions related to hazards and hazardous materials within the Project Area. The discussion includes a description of the types of hazardous materials used and hazardous wastes generated by oil and gas operations, an overview of potential upset scenarios, and a summary of known environmental contamination from public agency databases. This information provides the baseline for evaluating potential Project-related impacts, including the potential to create a significant hazard to the public or the environment through the release of hazardous materials or through reasonably foreseeable upset and accident conditions.

4.11.1 Existing Hazardous Materials and Waste Streams

Oil and gas facilities routinely use, store, and generate a variety of hazardous materials and waste:
Produced Fluids: The primary hazardous materials at any oil and gas site are the produced fluids themselves.
Crude Oil: A complex mixture of flammable liquid hydrocarbons. Vapors from crude oil can include flammable gases such as methane, propane, and butane. Depending on the geologic formation, crude oil can be "sour," meaning it contains appreciable quantities of highly toxic and corrosive hydrogen sulfide (H2S) gas, or "sweet," with very low levels of H2S.
Natural Gas: A mixture consisting primarily of methane. It is highly flammable and poses a risk of vapor cloud fires, explosions, and thermal radiation from jet fires if a high-pressure release occurs.
Produced Water: Water that is brought to the surface along with oil and gas. It is typically a highly saline brine and may contain dissolved hydrocarbons, naturally occurring radioactive materials (NORM), and chemicals used in the production process.
Operational Chemicals: A variety of chemicals may be stored and used on-site for maintenance and processing, including corrosion inhibitors, solvents, lubricants, and acids.
Hazardous Wastes: Decommissioning and maintenance activities can generate hazardous wastes, such as contaminated soils, used solvents, oily rags, and sludge from cleaned-out tanks, all of which must be managed and disposed of in accordance with Resource Conservation and Recovery Act (RCRA) and Hazardous Waste Control Law (HWCL) regulations.

4.11.2 Existing Hazards and Potential Upset Scenarios

Oil and gas production facilities present inherent hazards due to the nature of the materials and the high-pressure equipment involved. An upset condition is an unplanned event, such as an equipment failure or human error, that could result in the release of hazardous materials. Potential upset scenarios include:

Well Blowouts: An uncontrolled release of crude oil and/or natural gas from a well, which can occur if well integrity control systems fail. This is a low-probability but high-consequence event that can result in fires, explosions, and significant environmental contamination.
Pipeline and Equipment Ruptures: The failure of pipelines, valves, or other pressurized equipment can lead to the release of oil or flammable gas.
Storage Tank Failures: A structural failure or overflow of a storage tank can result in a large-scale surface spill, creating fire hazards and contaminating soil and water.

The significance of these potential hazards is elevated by the proximity of many facilities to sensitive populations. As detailed in *Section 4.3*, numerous oil facilities in areas like the Inglewood Oil Field, West Carson, and the Gateway communities are located immediately adjacent to residences, schools, healthcare facilities, parks, and major transportation corridors, placing these populations within the potential impact zone of an accidental release.

4.11.3 Known Contamination and Public Database Review

Historical oil production practices, which were subject to less stringent environmental regulations than exist today, have resulted in environmental contamination in some areas. A review of public regulatory agency databases was conducted to identify known sites of contamination within the Project Area.
EnviroStor Database: This database, maintained by the Department of Toxic Substances Control (DTSC), tracks sites with known or suspected hazardous substance contamination. The review indicated that several properties within active oil fields are listed on EnviroStor for investigation, cleanup, or long-term monitoring related to historical spills or disposal practices.
GeoTracker Database: This database, maintained by the State Water Board, tracks sites that impact or may impact water quality, primarily leaking underground storage tank (LUST) cases and other soil and groundwater cleanup sites. The review found numerous listings associated with oil and gas production facilities, typically related to surface spills of crude oil or refined products that have required remediation under the oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB).
Orphan and Idle Wells: A significant existing hazard is the presence of numerous "likely orphaned" or long-term idle wells identified by CalGEM. These wells may lack a viable operator or sufficient financial assurance for their proper plugging and abandonment. They pose a persistent risk of leaking methane (a GHG and explosion hazard) or other fluids that can contaminate soil and groundwater. The Project's mandate for phase-out and decommissioning is intended to prevent currently active or idle wells from becoming future orphan well liabilities.

4.12 HYDROLOGY AND WATER QUALITY

This section describes the existing surface water and groundwater resources in the Project Area, including their beneficial uses, existing water quality conditions, and drainage patterns. This information establishes the environmental baseline for the analysis of potential impacts to hydrology and water quality from the decommissioning and restoration activities that would be prompted by the Project.

4.12.1 Existing Hydrological Setting

Surface Water Hydrology

The Project Area spans portions of several major watersheds, including the Los Angeles River, San Gabriel River, and Santa Clara River watersheds. The primary surface water features are the rivers themselves, their major tributaries, and other waterways, such as Ballona Creek and Compton Creek. Decades of urbanization have led to the channelization of many of these river systems for flood control purposes. While heavily modified, these channels still convey storm flows, provide some habitat, and are the receiving waters for the region's storm drain system. Some existing oil facilities are located within the floodplains of these river systems.

Groundwater Hydrology

Los Angeles County overlies several large and critically important groundwater basins, which are a primary source of local drinking water. The major basins underlying the oil fields include the Central Basin, West Coast Basin, Santa Monica Basin, and the Santa Clara River Valley Basin. These basins are actively managed and recharged with stormwater and imported water at facilities known as "spreading grounds." The protection of these groundwater resources from contamination is a primary objective of state and local water quality regulations.

4.12.2 Existing Water Quality

Surface Water Quality

Due to extensive urban and industrial development, nearly all major surface water bodies in the Project Area are listed by the LARWQCB as impaired under CWA Section 303(d). Common pollutants causing impairment include heavy metals, bacteria, nutrients, pesticides, trash, and petroleum hydrocarbons. Urban runoff collected by the Municipal Separate Storm Sewer System (MS4) is a major source of this pollution. The primary risks to surface water quality from existing oil operations are associated with spills, leaks, and the discharge of contaminated stormwater runoff that has come into contact with production equipment and on-site contaminants. Existing facilities are required to implement a Stormwater Pollution Prevention Plan (SWPPP) under the Industrial General Permit to manage these risks.

Groundwater Quality

The quality of local groundwater basins is generally good, but some areas have been impacted by historical industrial and agricultural activities. Known groundwater contaminants in the region include volatile organic compounds (VOCs), nitrates, and heavy metals. A primary risk associated with oil and gas production is the potential for groundwater contamination from surface spills that migrate downward or from the subsurface migration of fluids due to improperly constructed or failed wells (i.e., loss of well integrity). The State's Underground Injection Control (UIC) program,

administered by CalGEM, is specifically designed to protect underground sources of drinking water from injection-related activities. Known groundwater contamination cases are tracked in the GeoTracker database, as discussed in *Section 4.11.3*.

4.12.3 Flood Hazards and Drainage

The Los Angeles County Flood Control District manages flood risk through a vast network of dams, reservoirs, debris basins, and more than 500 miles of open channels. In developed areas, stormwater drainage is collected by the Municipal Separate Storm Sewer System (MS4), which provides little to no treatment before discharging directly into surface water bodies.

Individual oil production sites are responsible for managing their on-site drainage to prevent erosion and control pollutants. According to mapping by the Federal Emergency Management Agency (FEMA), portions of several oil fields are located within 100-year or 500-year floodplains. Facilities within these zones are at risk of being inundated during a major storm event, which could lead to damage and the uncontrolled release of hazardous materials into floodwaters.

4.13 NOISE

This section describes the existing noise environment in the unincorporated areas of Los Angeles County. It includes a discussion of the fundamentals of environmental acoustics and a description of the existing ambient noise levels, primary noise sources, and noise-sensitive receptors in the Project Area. This information provides the baseline for the analysis of potential noise impacts from the decommissioning and restoration activities that would be prompted by the Project, as presented in *Chapter 5* of this EIR.

4.13.1 Fundamentals of Environmental Noise

Sound is a vibratory disturbance created by a moving or vibrating source, which is capable of being detected by the hearing organs. Noise is generally defined as unwanted sound. Sound is characterized by several variables, including frequency and intensity. Frequency describes the sound's pitch and is measured in Hertz (Hz). Intensity describes the sound's loudness and is measured in decibels (dB). Because the human ear is not equally sensitive to all frequencies, the A-weighted decibel scale (dBA) is used to filter sound frequencies in a manner that best approximates human hearing.

Since environmental noise fluctuates over time, a single-number descriptor is used to characterize the average noise level. The most common metrics are:

- Leq (Equivalent Continuous Sound Level): The average A-weighted sound level during a measurement period.
- Lmax (Maximum Sound Level): The highest instantaneous A-weighted sound level during a measurement period.

- Ldn (Day-Night Average Sound Level): The 24-hour average A-weighted sound level, with a 10-dBA "penalty" applied to noise occurring during the noise-sensitive nighttime hours (10:00 p.m. to 7:00 a.m.).
- CNEL (Community Noise Equivalent Level): A 24-hour average similar to Ldn, but with an additional 5-dBA penalty applied to noise occurring during the evening hours (7:00 p.m. to 10:00 p.m.). CNEL is the primary metric used by the State of California for land use compatibility planning.

4.13.2 Existing Noise Environment

Ambient Noise Levels

The existing ambient noise environment in the Project Area varies widely depending on location. In dense urban and suburban areas, the ambient noise environment is dominated by transportation noise, with CNEL values often exceeding 65 dBA near major freeways and arterial roadways. In the rural and open space areas of the County, the ambient noise environment is much quieter, with CNEL values that can be below 45 dBA.

Major Existing Noise Sources

- Transportation Sources: The dominant source of noise throughout most of the developed portions of the County is transportation. This includes traffic on major freeways (e.g., I-5, I-10, I-405), high-volume arterial roadways (e.g., La Cienega Boulevard), freight and passenger rail operations, and aircraft overflights associated with Los Angeles International Airport (LAX) and other regional airports.
- Stationary Oil and Gas Sources: Existing oil and gas facilities contain numerous stationary noise sources that often operate 24 hours a day. These include the cyclical, low-frequency sound of pumpjacks and the constant mechanical hum of compressors, engines, and processing equipment.
- Intermittent Oil and Gas Sources: Certain operational activities are significant, albeit temporary, sources of noise. The most prominent of these is well drilling, which involves the 24-hour operation of heavy diesel engines, generators, and mechanical equipment for a period of several days or weeks per well. Well servicing or "workover" operations generate similar types of noise. Additionally, heavy truck traffic associated with the transport of fluids and equipment contributes to local roadway noise.

Noise-Sensitive Receptors

Noise-sensitive receptors are land uses where excessive noise would interfere with normal activities and where a degree of quiet is expected. As detailed in *Section 4.3, Land Use and Planning*, a primary characteristic of the Project Area is the proximity of existing oil and gas facilities to sensitive receptors. These receptors include:

- Residences: Single-family homes, apartments, and condominiums located adjacent to oil fields in communities such as West Carson, View Park-Windsor Hills, and Rowland Heights.
- Schools and Daycare Centers: Where quiet is essential for learning.
- Hospitals and Nursing Facilities: Where quiet is necessary for patient rest and recovery.

- Parks and Recreational Areas: Such as Kenneth Hahn State Recreation Area, where excessive noise can detract from the recreational experience.

4.14 PUBLIC SERVICES AND UTILITIES

This section describes the existing public services and utilities that serve the Project Area. The discussion provides the environmental baseline for evaluating the potential for the Project to result in impacts on these services and systems, such as an increased demand for services or the need for new or physically altered facilities.

4.14.1 Public Services

Fire Protection and Emergency Medical Services

Fire protection, emergency medical, and hazardous materials response services in the unincorporated areas of Los Angeles County are provided by the Los Angeles County Fire Department (LACoFD). LACoFD operates numerous fire stations strategically located throughout its jurisdiction to provide timely emergency responses. Existing oil and gas facilities present unique challenges for fire protection due to the presence of large quantities of flammable liquids and gases, high-pressure equipment, and the potential for well blowouts or other industrial accidents. LACoFD maintains specialized training protocols and equipment, including firefighting foam and personnel trained in industrial firefighting, to respond to such incidents. As noted in *Appendix A*, several oil production facilities are located within or adjacent to fire training centers.

Police Protection

Law enforcement services in the unincorporated areas are provided by the Los Angeles County Sheriff's Department (LASD). The LASD operates from multiple stations throughout the County, providing patrol, investigation, and emergency response services. The LASD's role with respect to oil and gas facilities primarily involves responding to incidents, securing accident scenes, managing traffic control and evacuations during emergencies, and investigating reports of trespassing or vandalism at the sites.

Schools

The unincorporated areas of Los Angeles County are served by numerous public school districts. As detailed in *Section 4.3, Land Use and Planning*, and *Section 4.10, Hazardous Materials*, several existing oil and gas facilities are located on or immediately adjacent to school campuses and other educational facilities, which are considered sensitive land uses.

Parks and Recreation

Public parks and recreational facilities in the unincorporated areas are primarily operated and maintained by the Los Angeles County Department of Parks and Recreation. As previously described, several major County recreational facilities contain active oil and gas wells, including the Kenneth Hahn State Recreation Area, Whittier Narrows Recreation Area, and the Castaic Sports Complex. This co-location creates a direct interface between industrial oil and gas operations and public recreational uses.

4.14.2 Utilities and Service Systems

Water Supply

Potable water service in the unincorporated areas is provided by a complex network of public and private entities, including the Los Angeles County Waterworks Districts and numerous independent water retailers. A significant portion of the region's water supply is derived from local groundwater basins, supplemented by imported water from the State Water Project and the Colorado River. Existing oil and gas operations are consumers of water, primarily for dust control during maintenance and, historically, for drilling and well stimulation activities. Decommissioning activities prompted by the Project would also require water for dust control during grading and site restoration.

Wastewater Collection and Treatment

Wastewater collection and treatment services are provided by multiple regional entities, most notably the Los Angeles County Sanitation Districts (LACSD) and the City of Los Angeles Bureau of Sanitation (LABS). The LACSD operates a vast network of sewers and major treatment facilities, including the Joint Water Pollution Control Plant in Carson. Industrial wastewater generated at oil and gas facilities, such as produced water, is typically managed on-site, disposed of via deep-well injection under a permit from CalGEM, or, if it meets quality standards, discharged to the sanitary sewer system under an industrial wastewater discharge permit.

Solid Waste Disposal

Solid waste collection in the unincorporated areas is provided by private haulers under franchise agreements with the County. Disposal occurs at a network of regional landfills, many of which are operated by the LACSD or by private companies. Decommissioning activities prompted by the Project are anticipated to generate significant volumes of non-hazardous and hazardous solid waste, including scrap metal from dismantled equipment, concrete from removed foundations, and potentially large quantities of contaminated soil requiring disposal at an appropriately classified landfill.

Energy Utilities

- Electricity: Electrical transmission and distribution infrastructure (poles, wires, substations) in the unincorporated areas is provided and maintained primarily by Southern California Edison (SCE).

The default electricity provider for most residents and businesses is the Clean Power Alliance (CPA), a Community Choice Aggregation (CCA) entity that procures electricity from various sources. Oil and gas facilities are significant consumers of electricity, which is used to power pumps, compressors, and other processing equipment.

- Natural Gas: Natural gas service is provided by the Southern California Gas Company (SoCalGas). Natural gas produced as a byproduct of oil extraction at some facilities may be used as fuel on-site or, if it meets quality specifications, sold and transported via the local pipeline network.

4.15 TRANSPORTATION

This section describes the existing transportation system serving the Project Area, including the regulatory framework, the roadway network, public transit systems, and existing traffic conditions. This information provides the baseline for the analysis of potential transportation impacts from the decommissioning and restoration activities that would be prompted by the Project, as presented in *Chapter 5* of this EIR.

4.15.1 Existing Transportation System

The unincorporated areas of Los Angeles County are served by a vast and complex multimodal transportation network:

Roadway Network: The network is hierarchical, consisting of:

- Interstate Freeways: High-capacity, limited-access facilities providing regional and interstate connectivity, such as the Golden State Freeway (I-5), San Diego Freeway (I-405), and Santa Monica Freeway (I-10).
- State Highways: Routes that provide regional and inter-community connections, such as the Pacific Coast Highway (SR-1), Antelope Valley Freeway (SR-14), and Artesia Freeway (SR-91).
- County Roadways: A network of major, secondary, and local highways and streets maintained by the County of Los Angeles Public Works. These roadways provide direct access to the properties subject to the Project. Access to many oil field sites is provided by private roads that connect to this public roadway system.

Public Transit: The Los Angeles County Metropolitan Transportation Authority (Metro) is the primary regional transit provider, operating an extensive network of bus routes and a growing rail transit system. Several municipal transit operators also provide local service.

Bicycle and Pedestrian Facilities: The County maintains a network of bicycle facilities, including on-street striped bike lanes (Class II) and separated multi-use paths (Class I), many of which are located along river corridors. Pedestrian facilities consist primarily of sidewalks along public roadways.

4.15.2 Existing Traffic Conditions

The transportation system in Los Angeles County experiences some of the highest traffic volumes and levels of congestion in the nation. As reported by SCAG, Los Angeles County has the highest daily VMT in the six-county region, at over 220 million miles (Source: SCAG Modeling, 2023, as cited in the Certified Final PEIR for Connect SoCal 2024). This high level of vehicular travel is a primary contributor to regional air pollution and greenhouse gas emissions.

4.15.3 Existing Project-Related Traffic

The existing oil and gas facilities subject to the Project generate a variable level of traffic on the local and regional roadway network. This traffic consists of two primary components:
Worker Commute Trips: Daily vehicle trips are generated by employees and contractors traveling to and from the facilities for operations, maintenance, and administrative tasks.
Heavy Truck Traffic: Oil and gas operations require the use of heavy-duty trucks for numerous purposes, including:

- Hauling crude oil from the site via tanker trucks in areas not served by pipelines.
- Transporting produced water for disposal or recycling.
- Delivering materials and equipment, such as drilling pipe, chemicals, and machinery, via flatbed trucks.
- Servicing wells with workover rigs and other heavy equipment.

This heavy truck traffic primarily affects the local roadways providing direct access to the oil fields and can contribute to pavement degradation and potential safety conflicts with other road users.

4.16 WILDFIRE

This section describes the existing environmental setting related to wildfire hazards in the unincorporated areas of Los Angeles County. The discussion includes the environmental and regulatory context for wildfire, an overview of the existing fire hazard conditions in the Project Area, and the relationship between existing oil and gas facilities and wildfire risk. This information provides the baseline for the analysis of potential wildfire impacts from the decommissioning and restoration activities that would be prompted by the Project, as presented in *Chapter 5* of this EIR.

4.16.1 Wildfire Science and Environmental Factors

A wildfire is an uncontrolled fire that occurs in an area with combustible vegetation, often referred to as a wildland. The risk and behavior of wildfire in Southern California are primarily influenced by three factors: fuel, topography, and weather.
Fuel: The type, amount, and condition of vegetation and other combustible materials are critical factors. Much of the Project Area, particularly the hillside and mountain areas, is dominated by native vegetation communities such as coastal sage scrub and chaparral. These plant communities are highly adapted to a fire regime but are also highly flammable, especially during the dry season after accumulating years of growth.
Topography: The physical configuration of the landscape significantly affects fire behavior. Wildfires tend to spread much more rapidly uphill as flames preheat the fuels above them. The steep, rugged terrain of the San Gabriel Mountains, Santa Monica Mountains, and Puente Hills creates conditions conducive to rapid fire spread.
Weather: Weather is the most variable and often most critical factor. The long, dry summers of Southern California's Mediterranean climate leave fuels highly susceptible to ignition. This hazard is acutely amplified by periodic Santa Ana winds. These strong, hot, and extremely dry winds originate inland and flow offshore, often reaching high speeds as they are funneled through

canyons and passes. Santa Ana winds can drive catastrophic fire growth, pushing flames miles in a matter of hours and carrying embers far ahead of the main fire front to create new spot fires.

4.16.2 Existing Wildfire Hazard Setting

Fire Hazard Severity Zones (FHSZ)

CAL FIRE is required by law to map areas of significant fire hazard based on the factors of fuel, topography, and weather. These Fire Hazard Severity Zones (FHSZ) are categorized as Moderate, High, or Very High. A review of the official CAL FIRE FHSZ maps indicates that a significant number of the parcels containing oil and gas facilities are located within or immediately adjacent to areas designated as High or Very High Fire Hazard Severity Zones. The planning areas with the most significant overlap between oil facilities and VHFHSZs include the Santa Clarita Valley, the foothills of the San Fernando Valley, the Santa Monica Mountains, the Puente Hills, and the Inglewood Oil Field.

The Wildland-Urban Interface (WUI)

The Wildland-Urban Interface (WUI) is the area where homes and other human development meet or intermingle with undeveloped wildland vegetation. This is where wildfire poses the greatest risk to life and property. Much of the unincorporated area represents a classic WUI environment. The destructive potential of these conditions was starkly demonstrated during the January 2025 Southern California wildfires. Driven by a severe Santa Ana wind event and prolonged drought conditions, multiple catastrophic fires erupted across the County. These events underscore the extreme and increasing wildfire risk at the wildland-urban interface, where many oil and gas facilities are located.

4.16.3 Oil and Gas Facilities and Wildfire Risk

The presence of oil and gas infrastructure in these fire-prone WUI areas contributes to the existing wildfire risk in two primary ways:

- Potential Ignition Sources: Oil and gas facilities contain numerous potential sources of ignition. These include sparks from electrical equipment such as pumps and motors, hot exhaust surfaces on internal combustion engines, sparks from vehicles operating on-site, and maintenance activities such as welding or grinding. Additionally, the power lines that supply electricity to these remote facilities can themselves be a source of ignition if they are damaged or downed during high winds.
- Emergency Response and Evacuation Challenges: The location of industrial facilities with flammable and hazardous materials in high fire hazard areas can complicate emergency response. Firefighting efforts may be hampered by limited access on narrow private roads. The need to protect high-hazard industrial infrastructure can divert firefighting resources that would otherwise be used to protect homes. Furthermore, the presence of these facilities can complicate public evacuation by adding industrial traffic to constrained road networks.

4.17 AGRICULTURAL AND FORESTRY RESOURCES

This section describes the existing agricultural and forestry resources within the unincorporated areas of Los Angeles County that are relevant to the Project. This information provides the baseline for determining whether the Project would convert Farmland of Importance to non-agricultural use, conflict with existing zoning for agricultural use or a Williamson Act contract or involve other changes that could result in the loss of forest land.

4.17.1 Existing Agricultural Resources

The unincorporated areas of Los Angeles County contain significant agricultural regions, primarily within the Antelope Valley, Santa Clarita Valley, and the Santa Monica Mountains. Land uses include a mix of dryland farming, irrigated crops, orchards, and extensive grazing operations.

According to the Farmland Mapping and Monitoring Program (FMMP), approximately 53,000 acres of land within the unincorporated areas are mapped as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Grazing Land. However, agricultural productivity on many of these lands is limited by natural constraints such as water availability, soil type, and steep slopes.

Within these agricultural regions, existing oil production facilities are often located on hillsides or disturbed pads within larger parcels that are otherwise used for or zoned for agriculture. The presence of this industrial infrastructure can fragment agricultural land, reduce the total usable acreage for farming or grazing, and create land use conflicts with adjacent agricultural activities.

4.17.2 Existing Forestry Resources

Los Angeles County contains substantial areas of forested land, located primarily within the Angeles National Forest and portions of the Los Padres National Forest. These lands are managed by the U.S. Forest Service and are outside the jurisdictional scope of the Project. The County does retain land use authority over privately owned parcels, or "in-holdings," within the National Forest boundaries. These private parcels are generally steep, rugged, and environmentally constrained.

No existing oil and gas production facilities are designated as Timberland Production Zones (TPZs) or are otherwise classified as timberland or forest land for the purposes of commercial harvesting. Commercial timber production in Los Angeles County is extremely limited due to steep terrain and the prevalence of federal land ownership in the most heavily forested regions

CHAPTER 5.1 AESTHETICS

This section analyzes the potential for the Revised Oil Well Ordinance (the Project) to result in significant aesthetic impacts within unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would result in adverse effects to scenic vistas; damage to scenic resources, including those visible from designated state scenic highways; degradation of the existing visual character or quality of the landscape; or the creation of new sources of substantial light or glare that would affect views during the day or night.

The analysis evaluates both short-term and long-term aesthetic impacts associated with the decommissioning and removal of oil production infrastructure, as well as the visual outcomes of site restoration. Where applicable, the assessment distinguishes between impacts in urbanized and non-urbanized areas and considers variations in topography, land-use context, and regional visual sensitivity.

This chapter is organized to present the environmental and regulatory setting relevant to aesthetic conditions, the thresholds of significance used to evaluate aesthetic impacts under the California Environmental Quality Act (CEQA), the methods and assumptions used to assess potential impacts, and the results of the aesthetic impact analysis. Mitigation measures, where applicable, are also identified.

This analysis draws upon site-specific and regional context information contained in the Initial Study, the County's General Plan, and relevant Community Standards Districts (CSDs), as well as CEQA Appendix G thresholds. It also references aesthetic principles from County-adopted design standards, including those related to hillside development, community character, and the management of scenic resources.

During the public scoping period, a comment was received regarding the potential for aesthetic impacts. As shown in *Chapter 2*, Table 2-1: Summary of Scoping Comments Received, a concern was raised that the future redevelopment of oil field sites could transition lands from low-density industrial use to a denser, built environment with new buildings, potentially having a demonstrable aesthetic impact. This chapter considers this comment and evaluates the potential for the Project to affect scenic vistas, damage scenic resources, or create new sources of light and glare.

5.1.1 Environmental Setting

5.1.1.1 Regulatory Setting

Federal Regulations

Although the California Environmental Quality Act (CEQA) is a state-level statute, federal laws, policies, and guidelines contribute to the protection of visual resources throughout the United States. These federal frameworks influence how visual quality, scenic vistas, night sky preservation, and highway aesthetics are managed—especially in cases where federal lands, funding, permits, or approvals are involved. The following federal regulations and agency programs are relevant to the analysis of aesthetic impacts under CEQA.

National Parks Service – Organic Art and Scenic Resources

The National Park Service Organic Act of 1916 establishes conservation of scenery as a fundamental purpose of the National Park System. The Act mandates that park resources, including visual and aesthetic elements, be preserved "unimpaired for the enjoyment of future generations." NPS Management Policies (2006) further recognize scenic vistas, visual settings, and natural night skies as intrinsic resources requiring protection. When a project may affect views to or from a national park, preserve, or monument, CEQA documentation should address these federally protected aesthetic values. For example, the intrusion of new visual elements or lighting into a park viewshed could constitute a significant impact under both CEQA and federal policy.

In addition, the NPS collaborates with the International Dark-Sky Association (IDA) and designates select parks as "Dark Sky Parks," underscoring the national commitment to preserving natural nightscapes and reducing light pollution.

National Wild and Scenic Rivers Act (1968)

This Act protects rivers with "outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, [or] cultural" values in their free-flowing condition. For designated Wild and Scenic Rivers—administered by NPS, BLM, or USFS—adjacent development must avoid impairing the visual character of river corridors. CEQA documents must assess potential visual effects to these federally designated river environments, especially if views to or from the river could be altered by the project.

National Trails System Act – Scenic Trail Protection

The National Trails System includes National Scenic Trails (e.g., Pacific Crest Trail, Appalachian Trail) which are recognized for their exceptional scenic and recreational qualities. Federal land management agencies administer trail corridors to maintain their scenic integrity. Projects near these corridors must evaluate whether they intrude upon the scenic experience of trail users. Any degradation of the viewshed may be considered a potentially significant impact.

Bureau of Land Management (BLM) - Visual Resource Management (VRM)

The BLM employs a Visual Resource Management system to inventory and manage scenic quality on its lands. Lands are classified into VRM Classes I through IV, with Class I and II lands receiving the most rigorous visual protections. VRM Class II areas, for instance, must retain the landscape's existing character, allowing only minor visual changes that do not draw attention. Projects that are located on or adjacent to BLM land must be consistent with the applicable VRM class objectives, as identified in local BLM Resource Management Plans. Visual compatibility with the surrounding landscape, especially in high-value scenic areas, is a key performance expectation.

U.S. Forest Service (USFS) – Scenery Management System (SMS)

The USFS Scenery Management System (SMS) supports compliance with the National Forest Management Act (NFMA) by establishing Scenic Integrity Objectives (SIOs) for National Forest landscapes. These objectives are intended to preserve or restore the visual character of the forest, particularly in areas with high public use or scenic value. If a project is within or adjacent to a National Forest, CEQA analysis must consider potential visual impacts relative to the area's assigned SIO. High-SIO areas (e.g., “Very High” or “High”) are expected to exhibit little to no visual change from natural-appearing conditions.

National Environmental Policy Act (NEPA) and Federal Highway Administration (FHWA) Requirements

NEPA, enacted in 1969, requires that federal agencies evaluate the environmental consequences of their actions, including effects on the “human environment.” This encompasses visual resources, scenic quality, and aesthetic values. CEQA documents for projects with a federal nexus (e.g., funding, permitting, or land involvement) should coordinate with NEPA standards for assessing visual impacts.

Federal highway law—specifically 23 U.S.C. §109(h)—reinforces this focus on aesthetics, requiring that highway project development consider “aesthetic values” alongside social, economic, and environmental factors. The Federal Highway Administration (FHWA) has developed Visual Impact Assessment (VIA) methodologies to guide the evaluation of aesthetic impacts from transportation projects. These methodologies are often applied jointly with CEQA standards when Caltrans or other agencies undertake projects under dual CEQA-NEPA jurisdiction.

National Historic Preservation Act (NHPA) – Visual Context of Historic Properties

Under Section 106 of the NHPA, federal agencies must assess and consider the impact of their actions on historic properties, which includes effects on setting, feeling, and association. In CEQA, this consideration is typically addressed in the Cultural Resources section; however, aesthetic impacts to the visual context of a historic site (such as a landmark’s viewshed or contextual backdrop) may also be noted in the Aesthetics section when relevant. Altering the visual integrity of a listed or eligible historic property may conflict with both CEQA and federal preservation goals.

Section 4(f) of the U.S. Department of Transportation Act

Section 4(f) prohibits the approval of transportation projects that "use" publicly owned parks, recreation areas, wildlife refuges, or significant historic sites unless no feasible alternative exists and all possible mitigation measures have been implemented. Because many of these resources are scenic in character, CEQA documents should identify potential 4(f) resources and evaluate whether the project may cause visual intrusion, especially in parklands or near scenic viewpoints.

FAA Regulations – Lighting, Glare, and Obstruction Hazards

The Federal Aviation Administration (FAA) regulates the marking and lighting of tall structures under 14 CFR Part 77 to ensure airspace safety. This includes requirements for flashing lights or strobes on towers, wind turbines, or other elevated elements that exceed specified height thresholds near airports or airways. These mandatory lights can introduce new sources of nighttime glare or visual contrast, particularly in otherwise dark-sky environments. In 2013, the FAA also issued interim policy on solar glare, requiring that solar energy projects near airports conduct glare analyses to assess potential risks to pilots and air traffic control facilities. CEQA aesthetics analyses should acknowledge potential FAA requirements when a project introduces new lighting, glare, or reflective surfaces within airport influence areas.

Highway Beautification Act (HBA) of 1965

The HBA was enacted to preserve and enhance the visual quality of highways receiving federal funding. It limits billboards and mandates the screening of unsightly uses (e.g., junkyards) along designated highway corridors. The law's intent is to "protect the public investment in such highways, to promote the safety and recreational value of public travel, and to preserve natural beauty." CEQA projects along or visible from HBA-regulated highways should be evaluated for consistency with federal billboard controls and visual character preservation goals.

National Scenic Byways Program

Administered by FHWA, this program recognizes roadways with outstanding scenic, historic, recreational, or cultural values. Designated National Scenic Byways and All-American Roads have corridor management plans that seek to preserve their visual integrity. A CEQA aesthetics analysis must consider whether a project could introduce features that degrade these nationally recognized scenic routes.

U.S. Army Corps of Engineers / U.S. Coast Guard

In shoreline or navigable water contexts, the U.S. Army Corps of Engineers and the U.S. Coast Guard may require visual impact minimization for permitted projects. This is especially relevant when a project may alter a scenic riverfront, coastal bluff, or waterfront viewshed under federal jurisdiction.

Summary of Federal Aesthetic Considerations

Federal involvement in scenic resource protection is extensive, ranging from highway and parkland design to dark-sky preservation and glare control. Where a project may affect views recognized or protected under federal law—such as national parks, Wild and Scenic Rivers, or Scenic Byways—these policies establish clear visual protection expectations. Even for projects without direct federal oversight, federal guidelines serve as valuable benchmarks for assessing and mitigating aesthetic impacts in alignment with state and local visual quality objectives.

State Laws, Regulations, and Policies

Several California laws and regulatory programs establish protections for scenic highways, viewsheds, visual character, lighting impacts, and related aesthetic resources. These state frameworks guide local planning decisions and directly inform CEQA analyses of aesthetic impacts.

State Scenic Highway Program

The California Scenic Highway Program, established in 1963 and codified in the California Streets and Highways Code (Division 1, Chapter 2, Article 2.5, Sections 260–284), is intended to preserve and protect scenic highway corridors from visual encroachment and degradation. The program is administered by the California Department of Transportation (Caltrans) and applies to routes formally designated as “scenic highways” as well as those considered “eligible” for designation.

Eligible routes are listed in Sections 263 through 263.8 of the Streets and Highways Code. For a highway to receive official designation, the local jurisdiction must develop a Scenic Corridor Protection Program, which identifies the viewshed visible from the road and includes land use policies, zoning controls, and design review procedures to preserve scenic quality. Designated scenic highways must offer a high-quality natural landscape, unobstructed by large-scale or visually dominant development.

In Los Angeles County, several highways are officially designated or eligible for scenic status, and views from these corridors are considered sensitive visual resources under CEQA. While designation does not preclude development, projects within a scenic corridor must be designed to avoid significant visual intrusion.

California Environmental Quality Act (CEQA) – Visual Impact Analysis

Although CEQA is not a regulation specific to aesthetics, it requires that all public agencies evaluate and disclose the potential for a project to result in “significant environmental effects,” including impacts on scenic vistas, visual character, and sources of light or glare (CEQA Guidelines Appendix G). CEQA provides the statutory framework for identifying and mitigating

aesthetic impacts. In particular, visual impacts that substantially degrade scenic views, alter a distinct visual landscape, or introduce obtrusive lighting may be considered significant.

Notably, CEQA also recognizes impacts on visual aspects of cultural and historic resources—such as the visual setting of a historic landmark—as potentially significant effects on the environment. Visual character, neighborhood compatibility, and skyline features may all be relevant to CEQA analysis.

California Building Code – Outdoor Lighting Standards

The California Building Code (CBC), Part 2 of Title 24 of the California Code of Regulations, provides minimum standards for building design and construction, including outdoor lighting. The CBC incorporates and adapts the International Building Code to address California-specific needs.

Outdoor lighting standards in the CBC aim to:

- Improve energy efficiency and reduce unnecessary electricity consumption.
- Minimize light trespass and glare onto adjacent properties.
- Reduce skyglow and protect night sky visibility.
- Ensure that lighting is appropriately shielded, directed, and controlled.

Title 24 includes mandatory lighting controls such as automatic shutoffs, motion sensors, and limits on light output, particularly in non-residential settings. These requirements support broader state efforts to reduce light pollution and align with dark-sky best practices promoted by agencies such as Caltrans and the California Energy Commission.

Caltrans Transportation Aesthetics and Visual Impact Assessment (VIA) Guidance

The California Department of Transportation (Caltrans) maintains guidance for assessing visual impacts of transportation projects, especially those requiring compliance with both CEQA and NEPA. The Visual Impact Assessment (VIA) for Highway Projects guidance (Caltrans, 2019) outlines a tiered approach to evaluating how proposed projects affect visual resources and viewers' responses.

While primarily developed for highway projects, the VIA framework is frequently referenced for other large-scale development projects and provides methodology for assessing visual sensitivity, landscape character, viewer types, and levels of visual contrast. CEQA projects affecting scenic roadways or visually sensitive areas may rely on Caltrans methodology to support consistency and defensibility of visual impact findings.

California State Parks – Night Sky and Visual Character Preservation

California State Parks, as a major land manager and recreational provider, maintains policies that emphasize the protection of scenic vistas, night skies, and natural visual character in park units. While these policies do not apply directly to private development, projects located near or adjacent to State Parks should consider the potential for visual encroachment on park vistas, trails, or dark-sky conditions.

The Department also supports the California Statewide Scenic Highways and Byways System, which often overlaps with State Parks lands, and encourages park-compatible development along adjacent corridors.

California Public Utilities Commission (CPUC) – Visual Mitigation for Utility Projects

The CPUC oversees visual impact mitigation for utility infrastructure projects (e.g., transmission lines, substations), requiring utility providers to incorporate visual screening, low-profile designs, and context-sensitive alignment in areas with high scenic value or sensitive viewers. While primarily applicable to CPUC-regulated utilities, these standards reflect a statewide policy orientation toward visual compatibility and may be cited as guidance for CEQA projects with above-ground components.

California Coastal Act

Within the California Coastal Zone, the California Coastal Act (Public Resources Code §30000 et seq.) includes strong protections for public views, scenic coastal corridors, and natural character. In the Coastal Zone, any development that obstructs public views to the ocean or degrades visual character may be deemed inconsistent with the Act. If portions of a project fall within or adjacent to the Coastal Zone, these visual policies must be addressed directly in the CEQA analysis. The Revised Oil Well Ordinance does not apply in the Coastal Zone.

Summary of State Aesthetic Considerations

California's approach to scenic and visual resource protection is multifaceted, reflecting both the State's strong environmental values and its regional diversity. Through programs such as the State Scenic Highway Program, the California Building Code's outdoor lighting standards, and CEQA's own visual impact thresholds, the State has established a comprehensive foundation for evaluating and mitigating aesthetic impacts.

Under CEQA, aesthetic impacts are explicitly considered in terms of scenic vistas, visual character, scenic highway corridors, and light/glare. State law does not impose a single methodology for aesthetic evaluation, but rather provides a framework that emphasizes site-specific conditions, public views, and the character of the surrounding environment. Local jurisdictions retain discretion to define thresholds of significance, but must base their analysis on substantial evidence, including applicable state policies and planning documents.

The California Scenic Highway Program identifies and protects roadway corridors where high scenic resources contribute to the public's visual experience. Projects that affect designated or

eligible scenic highways must consider the visual sensitivity of these corridors, especially when new development or infrastructure could intrude upon the landscape.

State lighting regulations embedded in the California Building Code and Title 24 emphasize the importance of energy-efficient, glare-controlled lighting that minimizes disruption to adjacent uses and night sky visibility. These standards directly support CEQA's focus on evaluating new sources of substantial light or glare.

Additionally, while CEQA is a procedural statute, it incorporates and reflects the values of numerous state-level plans, including Caltrans Visual Impact guidance, State Parks' scenic resource policies, and CPUC utility siting principles—all of which encourage visual compatibility, scenic preservation, and context-sensitive design.

The State's aesthetic policy framework reinforces the importance of evaluating visual changes associated with the decommissioning of oil infrastructure, particularly where those facilities are visible from public roadways, open spaces, or sensitive receptors. The Revised Oil Well Ordinance supports long-term visual restoration and the reduction of industrial visual blight, as it aligns with state goals to enhance visual quality, protect scenic resources, and minimize light pollution across Los Angeles County.

Local Regulations

Scenic resources and visual quality in unincorporated Los Angeles County are governed by a combination of zoning ordinances, community-specific regulations, and Countywide policy documents. The regulatory framework is designed to preserve visual character, manage lighting impacts, protect significant viewsheds, and guide context-sensitive development, especially in areas with high aesthetic sensitivity.

The Los Angeles County (County) Code includes applicable sections to visual resources throughout the County's unincorporated communities. The following sections provide a brief overview of the applicable sections.

Title 22 – Planning and Zoning

Title 22 of the Los Angeles County Code (Zoning Code) establishes development regulations for all unincorporated areas of the County, including standards that influence community character and visual quality. Several chapters and subsections directly relate to aesthetic resources:

Division 10 (Planning Area and Community Standards Districts): Provides tailored development standards for specific communities. Planning Area Standard Districts (PASD) and Community Standard Districts (CSDs) may establish additional aesthetic guidelines such as building height limits, view protection policies, landscaping requirements, or signage controls to reinforce local character and preserve visual quality. Notably, the Baldwin Hills CSD, which includes the Inglewood Oil Field, establishes visual quality standards to address the interface between industrial activities and adjacent residential neighborhoods, parks, and recreational areas.

Chapter 22.80 (Rural Outdoor Lighting District): Establishes the Rural Outdoor Lighting District to protect dark sky resources with Los Angeles County. The district implements outdoor lighting controls to limit light pollution, glare, and light trespass in designated rural areas.

Division 6 (Development Standards): This Division includes regulations for the design and setback requirements along major roadways and parkways. It plays a key role in shaping the visual interface between development and public streets, particularly within scenic corridors.

Chapter 22.114 (Signs): Establishes countywide standards for the design, placement, and maintenance of signage. The intent is to minimize visual clutter, preserve scenic resources, and support community identity while allowing for effective business visibility. Signs are regulated to ensure compatibility with neighborhood scale and aesthetics, and to avoid interference with scenic views or visual landmarks.

Chapter 22.168 (Mills Act Program): Implements the Los Angeles County Mills Act Program, which offers property tax incentives for the restoration and preservation of qualified historic properties. Maintaining the visual integrity of historic buildings and their settings contributes directly to the County's broader aesthetic goals.

Chapter 22.174 (Oak Tree Permits): This ordinance protects oak trees as both ecological and aesthetic resources. It requires a permit for the removal or significant alteration of mature oak trees in unincorporated areas. The visual presence of oak woodlands, particularly in rural and hillside settings, is recognized as an important landscape feature.

Hillside Management Areas (HMAs)

The Hillside Management Area Ordinance, implemented through Chapter 22.104 of the County's Planning and Zoning Code, generally applies to lands with natural slopes of 25% or greater. HMAs are designated to preserve the physical character and scenic quality of hillside environments. Development in HMAs is subject to special design, grading, and conservation standards to protect views, limit erosion and wildfire risk, and maintain the visual prominence of natural terrain and ridgelines.

County General Plan

The General Plan is the overarching planning document guiding land use and environmental stewardship in unincorporated Los Angeles County. Aesthetic and scenic protections are most directly addressed in the Conservation and Natural Resources Element, particularly Section VII – Scenic Resources. Relevant goals and policies include:

- Goal C/NR 13: Protected visual and scenic resources.
    - Policy C/NR 13.1: Protect scenic resources through land use regulations that mitigate development impacts.
    - Policy C/NR 13.2: Protect ridgelines from incompatible development that diminishes their scenic value.
    - Policy C/NR 13.3: Reduce light trespass, light pollution and other threats to scenic resources.
    - Policy C/NR 13.4: Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
    - Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain.
    - Policy C/NR 13.6: Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.

- Policy C/NR 13.7: Encourage the incorporation of roadside rest stops, vista points, and interpretive displays into projects in scenic areas.
- Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- Policy C/NR 13.9: Consider the following in the design of a project that is located within an HMA, to the greatest extent feasible:
  - Public safety and the protection of hillside resources through the application of safety and conservation design standards;
  - Maintenance of large contiguous open areas that limit exposure to landslide, liquefaction and fire hazards and protect natural features, such as significant ridgelines, watercourses and SEAs.
- Policy C/NR 13.1: To identify significant ridgelines, the following criteria must be considered:
  - Topographic complexity;
  - Uniqueness of character and location;
  - Presence of cultural or historical landmarks;
  - Visual dominance on the skyline or viewshed, such as the height and elevation of a ridgeline; and
  - Environmental significance to natural ecosystems, parks, and trail systems.

Summary of Local Aesthetic Considerations

Through a combination of zoning ordinances, General Plan policies, and community-specific overlay districts, the County has established a detailed and enforceable framework for managing visual quality and protecting aesthetic resources. The County's local regulations emphasize view preservation, scenic corridor management, historic character retention, and light pollution control—particularly in hillside areas, rural communities, and designated scenic landscapes.

For the Revised Oil Well Ordinance, these local regulations are especially relevant in areas such as the Baldwin Hills CSD and other communities where oil infrastructure intersects with public views, parklands, or residential neighborhoods. By phasing out visual blight, removing incompatible industrial features, and restoring landscapes, the project aligns with and advances the County's adopted aesthetic goals and regulatory mandates.

5.1.1.2 Existing Environmental Conditions

The Revised Oil Well Ordinance would apply to unincorporated areas throughout Los Angeles County except the Coastal Zone, which would include a wide variety of landscape types, land use patterns, and development intensities. The affected areas are located in proximity to residential neighborhoods, open space preserves, commercial corridors, and industrial zones, and span urban, suburban, and rural communities across the County's diverse geographic planning areas.

Visual Character

Unincorporated Los Angeles County features a rich and varied visual environment shaped by topography, vegetation, land use, and the built environment. The County's landscapes range from coastal bluffs and foothills to high desert plateaus and densely developed valleys. In many

locations, the visual character is defined by natural features such as hillsides, ridgelines, canyons, and open space preserves.

However, in several planning areas—particularly the Westside, Metro, Santa Clarita Valley, and South Bay—the presence of oil wells, pump jacks, storage tanks, pipelines, and other associated equipment introduces conspicuous industrial elements that interrupt or dominate the visual setting. These facilities often contrast sharply with adjacent land uses, including residential neighborhoods, parks, and scenic open spaces, contributing to visual clutter and detracting from the natural landscape.

Over time, legacy oil infrastructure has become a persistent visual feature in portions of the Baldwin Hills/Inglewood Oil Field, Montebello Hills, and other legacy oilfields. These areas exhibit industrial patterns of development that include noise walls, lighting arrays, fences, and unpaved access roads, all of which contribute to an altered landscape condition.

Portions of the Inglewood Oil Field may be visible from multiple public vantage points, including Kenneth Hahn State Recreation Area and residential neighborhoods in Ladera Heights, Windsor Hills, and View Park. The 2008 Baldwin Hills CSD Final EIR identified the oil field's visual intrusions—such as pump jacks, tanks, roads, and noise walls—as a persistent concern for local communities and park users, particularly due to the facility's proximity to urban residential areas and popular public open spaces.

Scenic Vistas and Corridors

Publicly accessible scenic vistas in unincorporated Los Angeles County include prominent ridgelines, canyon views, coastal overlooks, and wide natural horizons—many of which are visible from regional parks, scenic roads, and multi-use trails. Local vantage points such as Kenneth Hahn State Recreation Area, Pico Canyon Park, and high points within the Santa Monica Mountains and Puente Hills offer pleasing vistas to expansive natural scenery that is highly valued by residents and visitors.

In some areas, viewsheds are compromised by nearby oil operations, where infrastructure such as flare stacks, derricks, or above-ground pipelines disrupts the continuity of natural or residential views. These intrusions are particularly impactful where they obstruct long-distance views or appear in high visual contrast to surrounding landscape features.

While the Project Area does not directly impact officially designated state scenic highways, several eligible scenic routes—including segments of Mulholland Highway and State Route 126 along the Santa Clara River—traverse or border unincorporated lands. In these areas, oil infrastructure visible from roadways can detract from the visual experience of motorists and other travelers.

The Revised Oil Well Ordinance, by initiating the phase-out of existing oil operations, is anticipated to reduce these visual impacts, resulting in a net improvement in scenic quality. However, the Project may require temporary disruptions to scenic vistas during decommissioning.

Unique Scenic Resources

Although the Project Area does not encompass unique scenic resources with formal historic or cultural designation (e.g., scenic landmarks or vistas protected under the California Register), many of the landscapes within unincorporated Los Angeles County lands possess intrinsic visual value due to their topographic complexity, native vegetation, and open-space character. Examples include:

- The rolling grasslands of the Montebello Hills;
- The ridgelines of the Santa Clarita Valley;
- The natural backdrop of the Santa Monica Mountains North Area;
- The edge conditions between the Inglewood Oil Field and nearby residential communities in Baldwin Hills.

In these areas, industrial oil features may encroach upon naturalistic views, compromising the visual coherence of the landscape. The removal of oil infrastructure under the Revised Oil Well Ordinance is expected to enhance the visual integrity of these resources.

Light and Glare

Oil production operations often involve high-intensity, fixed lighting to support nighttime drilling, maintenance, and facility access. This lighting, along with reflective surfaces such as tanks, piping, and metallic structures, contributes to light pollution and glare that can be seen from adjacent residential neighborhoods, parks, and roadways.

In rural and hillside areas with low ambient lighting, such as Del Valle, Pico Canyon, or Oat Mountain, artificial light associated with oil infrastructure can disrupt the natural night sky. In more urbanized settings, light and glare may contribute to cumulative aesthetic impacts when viewed in conjunction with street lighting, commercial signage, and other nighttime sources.

The Revised Oil Well Ordinance will eventually reduce or eliminate the long-term use of lighting for oil production as these facilities that are decommissioned and closed. While temporary lighting may be used during decommissioning activities, such lighting would be limited in duration and subject to existing regulations for directionality and shielding. Over the long term, the Revised Oil Well Ordinance will reduce sources of artificial light and visual glare, supporting County objectives for night-sky preservation and visual resource protection.

5.1.2 Thresholds of Significance

Consistent with the CEQA Guidelines Appendix G, Environmental Checklist, and County practice, the Project would have a significant impact to aesthetics if it would:

AE-1 Have a substantial adverse effect on a scenic vista.

AE-2 Be visible from or obstruct views from a regional riding, hiking, or multi-use trail.

AE-3 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
AE-4 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). In urbanized areas, conflict with applicable zoning and other regulations governing scenic quality.
AE-5 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

5.1.3 Environmental Impacts

5.1.3.1 Methodology

The evaluation of aesthetic impacts requires both an objective and context-sensitive approach. While aesthetics inherently involve subjective responses, this analysis uses recognized visual assessment principles to evaluate potential changes to the existing visual environment resulting from implementation of the Revised Oil Well Ordinance.

This assessment is based on a qualitative review of existing conditions and potential visual changes at the countywide scale. It considers:

- The existing visual character of unincorporated Los Angeles County, including landform patterns, vegetation, the built environment, and visual quality;
- The presence of sensitive scenic resources such as ridgelines, hillsides, open space, and scenic corridors;
- Public viewing locations, including residential neighborhoods, parks, roads, and trails;
- Viewer sensitivity and expectations, based on adjacent land uses and community context;
- Existing sources of artificial lighting and glare, and the degree to which they contrast with surrounding land uses or nighttime conditions.

Key sources of information include:

- California Geologic Energy Management Division (CalGEM) spatial data and existing well inventories;
- Review of land use and zoning maps;
- County General Plan and Community Standards Districts (CSDs);
- Prior CEQA documents (e.g., Baldwin Hills CSD EIR);
- Aerial imagery showing oil well locations, terrain, and adjacent land uses;
- Applicable state and local scenic regulations.

This methodology is consistent with CEQA Guidelines Appendix G and incorporates both localized visual context and viewer sensitivity to determine whether the Revised Oil Well Ordinance would result in a substantial adverse change in the visual environment.

5.1.3.2 Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22), the County General Plan, and the Newhall Ranch Specific Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once nonconforming, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Aesthetic-related project characteristics include:

- Elimination of New Oil Wells and Infrastructure: No new oil production facilities will be permitted in unincorporated areas of Los Angeles County. This prevents future visual impacts such as the introduction of pump jacks, tanks, flare stacks, and other industrial features into natural, residential, or recreational settings.
- Designation of Existing Wells as Nonconforming Uses: Existing wells and production facilities will become legally nonconforming and subject to phase-out over time. During the amortization period, these facilities must meet specific performance standards related to signage (PDF-AE-1: Site and Well Identification) and maintenance (PDF-AE-2: Ongoing Site Maintenance).
- Required Decommissioning and Site Restoration: Upon cessation of operations, wells must be properly plugged, associated equipment removed, and sites subjected to baseline restoration requirements pursuant to the Project's non-discretionary mandates (PDF-LU-1: Decommissioning and Site Restoration Mandate, and PDF-LU-2: Decommissioning and Infrastructure Removal). This process is expected to include regrading, debris removal, and vegetation clearance—resulting in improved visual conditions in the long term.
- Reduction in Light and Glare: Artificial lighting used for safety or 24-hour operations at some oil facilities will be eliminated over time. Any temporary or new permanent lighting used during the phase-out and decommissioning process will be strictly regulated (PDF-AE-3: Lighting Standards). Temporary lighting for decommissioning will be minimal, focused, and short-term. Reflective materials, which contribute to daytime glare, will also be removed during cleanup.
- Application to All Unincorporated Areas (Except the Coastal Zone): The Revised Oil Well Ordinance applies across a broad geographic area encompassing urbanized communities, rural landscapes, hillside environments, and natural open spaces. The most pronounced aesthetic improvements are expected in communities with legacy oil infrastructure near homes, schools, parks, or scenic viewsheds—such as Baldwin Hills, Puente Hills, Pico Canyon, and portions of the Santa Clarita, Gateway, Metro, and South Bay Planning Areas.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in long-term improvements to scenic resources and visual quality by eliminating incompatible industrial elements, particularly where oil infrastructure has degraded the visual character of otherwise natural or residential landscapes. While minor, temporary visual effects may occur during the decommissioning process—such as the presence of work crews, vehicles, or fencing—these impacts would be short-term and limited in extent.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for aesthetics, considering both temporary and permanent changes to the visual environment.

5.1.3.3 Impact Analysis

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). Measure ES1 is executed via the Revised Oil Well Ordinance (the Project). The CAP PEIR concluded that the long-term operational phase-out of fossil fuel facilities would generally be beneficial but acknowledged that the physical implementation of decommissioning and site remediation would require heavy equipment and earth-moving activities that generate short-term impacts. Therefore, this aesthetics analysis focuses on evaluating whether the specific short-term, temporary visual disruptions (e.g., presence of well-abandonment rigs, temporary safety fencing, and staging areas) required to implement the Project decommissioning process would result in significant aesthetic impacts. Because these temporary activities are strictly governed by the Project's own enforceable Project Design Features (PDFs)—specifically PDF-AE-1, PDF-AE-2, and PDF-AE-3—this analysis focuses on demonstrating how these built-in standards ensure short-term aesthetic impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The Project establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as a nonconforming use and required to cease operations in accordance with a 20-year amortization period. The Project also includes enforceable performance standards for site maintenance, well abandonment, bonding, signage, and restoration, which apply both during ongoing operations and throughout the decommissioning process.

From an aesthetics standpoint, the Project is expected to result in two primary types of effects:

- Short-term construction-related visual changes, which may occur during the decommissioning of existing facilities. These may include the temporary presence of heavy equipment, staging areas, fencing, temporary lighting, and access vehicles. Such effects would be localized and of limited duration, consistent with standard construction impacts.
- Long-term beneficial changes to the visual environment, including the removal of industrial infrastructure (e.g., pump jacks, tanks, piping), elimination of nighttime lighting and glare, and restoration of disturbed sites. These actions would generally improve the visual character of affected areas, especially in locations adjacent to residential neighborhoods, parks, trails, or open space.

This section evaluates the project's impacts relative to each of the applicable CEQA significance thresholds identified in *Section 5.1.2*. The analysis considers both the temporary and permanent effects of implementation, using a qualitative approach that accounts for the diversity of visual conditions across the County's unincorporated communities. Where applicable, the analysis also considers viewer sensitivity, proximity to scenic resources, and the project's consistency with relevant local and state aesthetic policies.

Impact 5.1-1: Would the proposed Project have a substantial adverse effect on a scenic vista? [Threshold AE-1]

Less Than Significant Impact.

The project is anticipated to result in a long-term beneficial effect on scenic vistas throughout unincorporated Los Angeles County. Scenic vistas in the County are typically defined by unobstructed views of natural features such as ridgelines, hillsides, coastal bluffs, canyons, and expansive open space. These views are often experienced from public parks, multi-use trails, scenic roadways, and residential neighborhoods.

Currently, in several unincorporated areas—including Baldwin Hills, Pico Canyon, and the northern portions of the Santa Clarita Valley—scenic vistas are visually interrupted by oil production infrastructure. This includes pump jacks, derricks, tanks, pipes, access roads, and other industrial equipment that contrast strongly with the surrounding natural landscape. These facilities can visually intrude upon views from nearby homes, public trails, and scenic lookouts, reducing the aesthetic quality of the experience.

The Revised Oil Well Ordinance will prohibit new oil well development and require the decommissioning and removal of existing oil infrastructure over a 20-year amortization period. As oil production facilities are phased out and sites are restored, the physical obstructions currently degrading scenic vistas will be eliminated. In many areas, this will result in the reestablishment of natural sightlines, clearer views of ridgelines and hillsides, and improved visual continuity across open space areas. These outcomes support General Plan Goal C/NR 13 to protect visual and scenic resources and are consistent with Policies C/NR 13.1 and 13.2, which call for the mitigation of development impacts on scenic views and the protection of ridgelines.

While temporary visual disturbances may occur during the decommissioning process—such as the presence of heavy machinery, equipment storage, or safety fencing—these impacts will be short in duration, limited to the immediate area, and similar in character to typical construction activities. They will not substantially obstruct or degrade public views from scenic vantage points.

Consistent with the programmatic findings of the CAP PEIR, because the temporary visual degradation from decommissioning equipment is short-term and geographically dispersed, and ultimately results in the permanent, beneficial removal of visually incompatible industrial infrastructure, the impact is less than significant.

Impact 5.1-2: Would the proposed Project be visible from or obstruct views from a regional riding, hiking, or multi-use trail? [Threshold AE-2]

Less than Significant Impact.

This threshold reflects Los Angeles County's recognition of public trail systems as important components of the County's recreational and visual landscape. Many regional riding, hiking, and multi-use trails traverse unincorporated areas, including but not limited to segments of trails in the Kenneth Hahn State Recreation Area, the Santa Monica Mountains trail network, the Chandler Fire Road in Pico Canyon, and trails within Santa Clarita and the Puente Hills.

The 2008 Baldwin Hills CSD Final EIR noted the high visual sensitivity of users at public open spaces near the Inglewood Oil Field, particularly park visitors and trail users seeking natural or scenic views. The proximity of oil operations to publicly accessible viewpoints amplified visual impacts, which were considered a major concern during public scoping and community workshops.

These trails often offer elevated or panoramic views of surrounding open space, ridgelines, urban development, or natural features. Viewer sensitivity along these corridors is typically high, as trail users tend to be engaged in recreational or contemplative activities and expect an immersive visual experience. The presence of oil production facilities—such as pump jacks, tanks, access roads, and noise walls—within the viewshed of trails can diminish the aesthetic value of the trail experience, particularly when infrastructure is located close to the trail alignment or when it contrasts with the surrounding natural landscape.

The Project will not introduce any permanent above-ground structures or visual elements that would affect trail users. Instead, it prohibits the development of new oil wells and associated infrastructure within unincorporated County areas. Over time, it requires the removal and restoration of existing oil facilities, many of which are currently visible from public trails.

While the decommissioning process may involve temporary visual elements such as equipment staging, fencing, or vehicle access routes, these activities would be short in duration, limited to immediate oil production sites, and visually consistent with typical construction practices. The temporary presence of such features would not result in long-term obstruction or degradation of trail views.

In the long term, the Project is expected to improve views from regional trails by eliminating incompatible industrial elements and restoring a more naturalistic visual condition. This would particularly benefit trail segments near the Inglewood Oil Field, Santa Clarita Valley, and Puente Hills, where oil infrastructure may currently be prominent in the foreground or middle-ground views from public trail alignments.

Therefore, because no new visual obstructions would be introduced and existing visual encroachments would be removed over time, the Project would not result in a significant impact on views from regional trails. The impact would be less than significant.

Impact 5.1-3: Would the proposed Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? [Threshold AE-3]

Less than Significant Impact.

CEQA Guidelines Appendix G specifies that a project may have a significant aesthetic impact if it would substantially damage scenic resources—such as mature trees, rock outcroppings, or historic buildings—located within the viewshed of a designated state scenic highway. For the purposes of CEQA, a "scenic resource" is generally considered to be a visually prominent or valued natural or built feature that contributes to the scenic quality of the landscape as seen from public vantage points.

The California Scenic Highway System (California Streets and Highways Code Section 260 et seq.) includes highways that are either officially designated or eligible for designation as state

scenic highways. Within unincorporated Los Angeles County, several roadways are eligible, but only a few are officially designated. The only officially designated State Scenic Highways within unincorporated Los Angeles County are State Route 2 (Angeles Crest Scenic Byway) and the southern portion of State Route 27 (Topanga Canyon Boulevard). Both are located far from known oil-producing areas on unincorporated Los Angeles County lands.

While the Project Area includes portions of unincorporated Los Angeles County where eligible scenic highways are present—such as Mulholland Highway—the Project will not introduce new visible structures or grading activities that could affect scenic resources within these highway corridors. The Project does not involve any new development, excavation, tree removal, or construction of facilities that would alter or damage scenic resources such as trees, boulders, or historic structures within or visible from a state scenic highway.

Instead, the Project will prohibit new oil well construction and facilitate the gradual decommissioning and removal of existing oil infrastructure. In some locations, oil production facilities may currently be visible from segments of eligible scenic highways, and their eventual removal may result in improved visual conditions. Additionally, any site restoration activities will be subject to County requirements related to soil stabilization, erosion control, and vegetation management, further supporting the protection of scenic features such as natural landforms and existing tree cover.

In summary, the Project would not result in the loss or degradation of scenic resources within a designated state scenic highway corridor. Consistent with the programmatic findings of the CAP PEIR, because the temporary visual degradation from decommissioning equipment is short-term and geographically dispersed, and ultimately results in the permanent, beneficial removal of visually incompatible industrial infrastructure, the impact is less than significant.

Impact 5.1-4: Would the proposed Project substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features, and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from a publicly accessible vantage point.) [Threshold AE-4]
Less than Significant Impact.

Unincorporated areas of Los Angeles County include a wide range of visual environments, from remote natural landscapes and foothills to densely developed suburban communities. Many of these areas are subject to public views from roadways, parks, scenic overlooks, and multi-use trails. In nonurbanized areas, visual character is typically defined by open space, topographic variation, and natural vegetation, while in urbanized areas, character is influenced by built form, land use patterns, and the scale and style of development.

Currently, oil production infrastructure—such as pump jacks, tanks, pipelines, noise walls, and access roads—detracts from the visual quality of both urban and nonurbanized areas. In natural

settings, these features appear as stark visual intrusions that contrast with the surrounding topography, vegetation, and open viewsheds. In suburban and urban contexts, oil facilities often conflict with the established character of residential neighborhoods and community gateways, introducing industrial patterns of height, bulk, and materials that are inconsistent with surrounding land uses.

The 2008 Baldwin Hills CSD Final EIR characterized the Inglewood Oil Field as a visually prominent feature due to its location atop rolling hills and adjacent to major recreational and residential areas. At that time, industrial elements such as flare stacks, tanks, and nighttime lighting were identified as visually incompatible with the surrounding open space and residential neighborhoods. The Revised Oil Well Ordinance addresses these long-standing visual conflicts by facilitating the phased removal of oil infrastructure in Baldwin Hills, including areas most visible from Kenneth Hahn State Recreation Area and surrounding communities.

The Project would not introduce new above-ground structures or design features that alter the scale, pattern, or visual coherence of the existing built environment. Rather, it would phase out existing oil production facilities, designate them as nonconforming uses, and require their eventual decommissioning and removal. Once decommissioned, oil production sites must be restored in accordance with County performance standards, which include the removal of infrastructure, and, where appropriate, revegetation.

In nonurbanized areas, the removal of incompatible industrial features will improve the overall visual integrity of public views by eliminating sources of visual blight and restoring a more natural landscape character. These benefits would be most apparent in locations where oil production sites are visible from ridgelines, trails, or open space preserves, including portions of the Santa Monica Mountains, Pico Canyon, and the Santa Clarita Valley.

In urbanized areas, where oil infrastructure is often embedded within or adjacent to residential neighborhoods or industrial uses, the project supports land use compatibility and helps reduce long-standing aesthetic conflicts. In these settings, temporary visual changes during decommissioning would be driven by the presence of heavy well-abandonment rigs, staging of drill pipes, and temporary fencing. While a well-abandonment rig is a tall, visually prominent piece of industrial equipment, its presence at any individual well site is temporary and short-term (typically lasting a few weeks to a few months per well). This temporary visual intrusion is consistent with heavy construction activity and is a necessary phase to achieve the long-term permanent removal of the visual blight. Therefore, it would not result in a permanent degradation of public views.

The Project also supports compliance with applicable County regulations and plans that govern scenic quality, including:

- Los Angeles County Zoning Code (Title 22), which regulates height, bulk, signage, and lighting;
- Community Standards Districts (CSDs), which provide enhanced aesthetic protections in areas such as the Baldwin Hills;
- General Plan policies, including Policy C/NR 13.4, which encourages development to maintain a consistent visual relationship with natural terrain and vegetation.

By removing visually disruptive elements and aligning with zoning and community standards, the Project promotes a transition toward a more cohesive visual environment. Therefore, the Project would not substantially degrade the visual character or quality of public views, nor would it conflict with applicable zoning or scenic regulations. The impact would be less than significant.

Impact 5.1-5: Would the proposed Project create a new source of substantial shadows, light, or glare that would adversely affect day or nighttime views in the area? [Threshold AE-5]

Less than Significant Impact.

Artificial lighting and glare can degrade the nighttime visual environment, disrupt views of the night sky, and contribute to light pollution, particularly in rural or low-light areas. Sources of glare during daylight hours—such as reflective building materials, tanks, or equipment—can also affect visual comfort and scenic quality.

Currently, many oil production facilities in unincorporated Los Angeles County operate with continuous or intermittent lighting to support nighttime operations, security, and safety. These facilities may include pole-mounted floodlights, perimeter lighting, and other high-intensity light sources, often unshielded or directed toward work areas. In addition, metallic or reflective surfaces—such as tanks, piping, or wellheads—can produce daytime glare that disrupts the visual character of otherwise natural or residential settings.

The Project does not propose the construction of any new structures, permanent facilities, or lighting systems. By prohibiting new oil wells and associated infrastructure, the Revised Oil Well Ordinance ensures that no new sources of artificial light, shadow, or glare will be introduced. Instead, the Project facilitates the phased decommissioning and removal of existing oil production facilities that currently contribute to lighting and glare impacts.

During the decommissioning process, temporary lighting may be used for nighttime safety, security, and situations where continuous 24-hour well-plugging operations are required to maintain wellbore stability. However, such lighting will be limited to the active decommissioning phase for each well. Furthermore, temporary lighting will be required to comply with applicable County standards, including shielding and directionality requirements under the Zoning Code and, where applicable, Community Standards Districts (CSDs). These standards ensure that temporary nighttime lighting is directed downward and focused strictly on the active work area, preventing substantial light trespass into adjacent residential or open space areas.

Once decommissioning is complete, existing sources of artificial light and reflective surfaces will be removed, reducing both nighttime skyglow and daytime glare. This is especially beneficial in areas with low ambient lighting, such as the Santa Monica Mountains North Area, Del Valle, and Pico Canyon, where the preservation of dark skies is an important visual and environmental resource.

The Project supports the County's General Plan Policy C/NR 13.3, which seeks to reduce light trespass, light pollution, and other threats to scenic resources. It also aligns with County rural

lighting ordinances and dark-sky preservation efforts aimed at enhancing nighttime visual quality in both natural and residential areas.

In summary, the Project would not create any new permanent sources of light or glare, and it would incrementally eliminate existing sources as oil operations are phased out. Temporary lighting associated with decommissioning would be minor, controlled, and consistent with County regulations. Therefore, the project would not adversely affect day or nighttime views due to lighting or glare, and the impact would be less than significant.

5.1.4 Cumulative Impacts

This section evaluates whether the Revised Oil Well Ordinance (the Project), when considered in combination with other past, present, or reasonably foreseeable future projects, would result in a cumulatively considerable impact on aesthetic resources, as defined in CEQA Guidelines Section 15130.

Cumulative aesthetic impacts could occur if the Project's visual effects—such as changes to scenic vistas, public views, or light and glare conditions—would combine with those of other projects to result in the degradation of visual character across a shared viewshed or broader landscape. However, rather than contributing to cumulative degradation, the Project is part of a larger regional and statewide transition away from fossil fuel extraction that is anticipated to result in long-term aesthetic improvement.

The Project is aligned with multiple state-level legislative and policy actions that collectively seek to phase out oil production in California, particularly in urbanized and environmentally sensitive areas. These include:

- Senate Bill 1137 (Gonzalez, 2022): Establishes 3,200-foot health protection zones around sensitive receptors (e.g., homes, schools, and hospitals) and restricts oil and gas operations within those setbacks. The bill's implementation supports the removal of oil infrastructure from areas with high visual sensitivity, thereby enhancing community aesthetics and public views.
- Assembly Bill 2716 (Bryan, 2024): Requires that wells within the Inglewood Oil Field be plugged and abandoned by December 31, 2030. This legislation directly overlaps with areas subject to the Revised Oil Well Ordinance and ensures the visual rehabilitation of a historically industrialized and highly visible landscape.
- Assembly Bill 1866 (Muratsuchi, 2024): Strengthens idle well management by requiring updated Idle Well Management Plans (IWMPs), increased bonding for cleanup, and stricter enforcement. These measures improve the likelihood that visually degraded sites will be restored in a timely and effective manner.
- Executive Order N-79-20 (Governor Newsom, 2020): Commits California to a phased transition away from fossil fuel reliance, including a target for 100% zero-emission vehicle sales by 2035 and broad decarbonization of the energy sector. While not focused on aesthetics, this policy context reinforces the State's long-term intent to eliminate fossil fuel infrastructure from California's landscapes.
- California Building Code: Includes outdoor lighting standards designed to minimize skyglow, light trespass, and glare. These requirements align with the project's removal of artificial lighting sources at oil production sites and reinforce regional goals to preserve nighttime visual quality.

Together, these state-level initiatives complement the Project's goals by promoting the decommissioning of legacy oil infrastructure, the restoration of natural and community-compatible land uses, and the reduction of industrial lighting and visual blight across Los Angeles County and beyond.

Within unincorporated areas of Los Angeles County, several areas with existing oil infrastructure are within shared viewsheds or public vantage points—such as Baldwin Hills, Santa Clarita Valley, and the Puente Hills region. In these locations, cumulative decommissioning efforts under the project and state policy may collectively improve scenic vistas, restore public views, and reduce long-standing visual conflicts.

The Revised Oil Well Ordinance reflects a policy evolution from prior County efforts to manage compatibility concerns in oil-producing areas like Baldwin Hills. The 2008 Baldwin Hills CSD EIR identified the need for permanent visual protections and stricter development standards for oil infrastructure within urban settings. The current project builds upon and exceeds those prior measures by fully prohibiting new wells and requiring decommissioning of existing oil facilities, thus achieving a cumulative regional visual improvement.

Importantly, the Project does not introduce any new structures or land uses that could adversely affect visual resources. It does not contribute to regional growth or intensification of land use that might increase visual impacts. Instead, it removes incompatible industrial features, reduces artificial lighting, and restores natural visual character over time.

As such, the Project's incremental effects would not be cumulatively considerable. Rather, the Project contributes to a broader cumulative aesthetic benefit across the region. Scenic vistas are expected to improve, light pollution will be reduced, and the overall visual integrity of affected areas will be enhanced as legacy oil infrastructure is phased out.

Impact 5.1-6: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on a scenic vista? **Less Than Significant Impact**.

Scenic vistas across Los Angeles County include ridgelines, open space preserves, natural hillsides, and long-range views toward the Pacific Ocean, Santa Monica Mountains, and Angeles National Forest. These views are typically experienced from public parks, regional trails, designated scenic highways, and residential neighborhoods. The County General Plan (Goal C/NR 13) prioritizes the protection of these visual and scenic resources.

Currently, oil production facilities degrade several scenic vistas, particularly in areas such as Baldwin Hills and the Santa Clarita Valley, where oil infrastructure interrupts or intrudes upon otherwise expansive views of open space or natural landforms. In these locations, views from publicly accessible vantage points—including parks, roadways, and multi-use trails—are adversely affected by pump jacks, tanks, noise walls, and other industrial features.

The Revised Oil Well Ordinance, by prohibiting new oil well development and requiring the phase-out and removal of existing oil infrastructure, will directly improve views in areas currently impacted by oil production. Over time, the visual obstruction and landscape fragmentation caused by oil

operations will be reduced or eliminated, allowing scenic vistas to recover. This effect will be particularly pronounced in areas where multiple facilities are clustered within a single viewshed.

Other regional and statewide efforts to phase out fossil fuel infrastructure—such as Senate Bill 1137—further reinforce this trend by requiring the removal of oil infrastructure near sensitive land uses or within legacy oil fields. As multiple jurisdictions move toward decommissioning oil production sites, the cumulative effect is expected to be the removal of industrial oil production infrastructure from scenic views across the Los Angeles Basin.

Any future development in the region will continue to be subject to Los Angeles County's zoning regulations, General Plan policies, and design standards, which provide protection for scenic vistas through height limits, view corridor preservation, and hillside management practices, as well as subsequent review under CEQA.

As the Project does not introduce any new structures or visual obstructions and instead facilitates the removal of existing view-blocking infrastructure, its incremental effect on scenic vistas is beneficial rather than adverse. Therefore, the cumulative impact on scenic vistas would be less than significant.

Impact 5.1-7: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

Less than Significant Impact.

Los Angeles County's unincorporated areas contain an extensive network of regional trails used for hiking, equestrian riding, and multi-use recreation. Many of these trails traverse areas of high scenic value, such as the Santa Monica Mountains, Santa Clarita Valley, and Baldwin Hills, where expansive views of natural terrain are a defining part of the trail experience.

Historically, the presence of oil infrastructure along or near these trails—such as pump jacks, tanks, equipment yards, and access roads—has introduced industrial elements that diminish the quality of views from these public recreational corridors. Trail users, who are generally considered to have high visual sensitivity due to their focus on recreation and landscape appreciation, are adversely affected by the visibility of such features within otherwise natural settings.

The Project would not introduce any new above-ground facilities or structures that would be visible from or obstruct views along regional trails. Instead, it facilitates the gradual decommissioning and removal of existing oil infrastructure, thereby eliminating current sources of visual intrusion within the trail viewshed. Over time, the removal of oil-related equipment and restoration of disturbed sites will enhance the visual quality of the trail experience.

In the broader regional context, other state and local actions—including SB 1137, AB 2716, and strengthened enforcement of idle well decommissioning requirements under AB 1866—are expected to result in the widespread removal of oil infrastructure throughout Los Angeles County.

These efforts, when considered cumulatively with the Project, contribute to a net improvement in trail views and scenic continuity.

Future land uses near regional trails will continue to be regulated by the County's Zoning Code, including Community Standards Districts, which are designed to protect trail vistas, minimize view obstruction, and reduce light and glare. These regulations serve to limit the aesthetic impact of new development in proximity to trails.

Because the Project does not contribute new visible elements and instead supports the removal of existing visual encroachments, its incremental effect on regional trail views is beneficial. When considered with other present and future efforts to remove oil infrastructure, the cumulative impact on views from regional trails would be less than significant.

Impact 5.1-8: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings in a state scenic highway? **Less than Significant Impact.**

Scenic resources—such as mature trees, prominent rock outcroppings, and historically significant buildings—contribute to the visual quality of landscapes and are considered especially sensitive when located within the viewshed of state-designated scenic highways. CEQA Guidelines Appendix G identifies substantial damage to such resources as a potentially significant aesthetic impact, particularly where public views from scenic corridors are involved.

Within unincorporated Los Angeles County, State Route 2 (Angeles Crest Highway) and State Route 27 (Topanga Canyon Boulevard) are the only officially designated State Scenic Highways. Several other routes—such as S Mulholland Highway and State Route 126—are listed as eligible scenic highways by Caltrans. In these corridors, scenic resources such as oak woodlands, chaparral-covered hillsides, and historic structures are valued components of the traveling public's visual experience.

The Revised Oil Well Ordinance does not propose any construction, grading, or vegetation removal that could affect these scenic resources. Instead, the Project prohibits new oil well development and requires the phased removal of existing oil infrastructure, including visual intrusions currently visible from some scenic highway segments. The Project's implementation would result in improved views from these corridors, particularly where oil facilities currently degrade the natural or historic character of the landscape.

In the broader regional context, other projects and policies with similar objectives—such as SB 1137, which restricts operations near sensitive receptors, and AB 1866, which accelerates the cleanup of idle wells—further reduce the potential for cumulative degradation of scenic resources. These efforts support the elimination of legacy industrial features that might otherwise remain indefinitely within scenic highway viewsheds.

Future development near scenic highways remains subject to County regulations, including the Zoning Code, Planning Area and Community Standards Districts, and General Plan Policy C/NR 13.6, which prohibits outdoor advertising and billboards along scenic routes and corridors, further limiting potential future impacts.

Because the Project does not contribute to the loss or disturbance of scenic resources and instead facilitates their long-term protection and visual enhancement, its incremental contribution to any cumulative impact is not considerable. When viewed alongside complementary efforts to reduce the visual footprint of oil production, the cumulative impact on scenic resources within state scenic highway viewsheds would be less than significant.

Impact 5.1-9: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, substantially degrade the existing visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact.

The visual character of unincorporated Los Angeles County is shaped by a combination of natural landscapes, topographic features, and built development patterns. In many areas, public views of hillsides, open space, and community-scale development are interrupted by legacy oil infrastructure, including pump jacks, storage tanks, maintenance yards, and unpaved service roads. These facilities are often visually incompatible with surrounding residential, recreational, or natural open space uses.

The Revised Oil Well Ordinance, when considered alongside other regional and state initiatives, is expected to have a cumulatively beneficial effect on the visual character and quality of public views. Rather than introducing new visual elements or altering land use intensity, the Project facilitates the removal of existing industrial infrastructure, helping to restore a more cohesive and context-sensitive landscape in areas historically impacted by oil production.

Other policy efforts that reinforce this visual transition include:

- Senate Bill 1137, which phases out oil operations near sensitive receptors, particularly in areas with community-scale views;
- Assembly Bill 2716, which mandates the full abandonment of wells in the Inglewood Oil Field by the end of 2030;
- Assembly Bill 1866, which strengthens requirements for idle well remediation, increasing the likelihood that visually degraded sites will be restored;
- County General Plan Goal C/NR 13, and its supporting policies (e.g., C/NR 13.1, 13.4, and 13.5), which encourage development that is visually compatible with the natural environment and seeks to mitigate or eliminate sources of visual blight.

Future development within the County remains subject to zoning standards, CSDs, and HMA regulations that are designed to maintain and enhance local visual character. These include

restrictions on building height and massing, grading, signage, lighting, and landscaping—all of which function to ensure that new development respects scenic quality.

Cumulatively, the removal of oil infrastructure under the Project and similar efforts contributes to a reduction in industrial presence, the improvement of visual harmony, and the elimination of conflicting land uses—particularly in areas where public views are available from trails, roads, parks, and residential neighborhoods.

Because the Project does not introduce new development or elements that would degrade visual character, and because it actively promotes the restoration of previously disturbed or visually degraded sites, its incremental contribution to any cumulative impact is not considerable. In combination with related efforts, the project helps to enhance rather than degrade public views and visual quality.

Accordingly, the cumulative impact on visual character and consistency with applicable zoning and scenic regulations would be less than significant.

Impact 5.1-10: Would implementation of the proposed Project, when combined with other past, present, or reasonably foreseeable projects, create a new source of substantial light or glare that would adversely affect day or nighttime views?

Less than Significant Impact.

Artificial light and glare are common contributors to visual degradation in both rural and urbanized settings. Excessive nighttime lighting can disrupt views of the night sky, contribute to light pollution, and affect the visual quality of residential neighborhoods, parks, and natural areas. Glare from reflective surfaces during daylight hours can create visual discomfort or disrupt the visual coherence of a landscape, particularly in scenic or open space areas.

Currently, oil production facilities in unincorporated Los Angeles County contribute to both artificial lighting and daytime glare. Site lighting for 24-hour operations, security, and emergency access often includes unshielded or high-intensity fixtures. Reflective surfaces such as storage tanks, piping, and machinery also generate daytime glare visible from surrounding public areas. These visual effects are particularly impactful in nonurbanized areas where ambient lighting levels are low, such as in portions of the Santa Clarita Valley and Pico Canyon.

The Project will not introduce any new permanent lighting or reflective structures. Instead, by prohibiting new oil wells and associated facilities and requiring the decommissioning and removal of existing oil infrastructure, the project directly supports the reduction of light and glare sources. Any temporary lighting required during the decommissioning phase will be short-term, shielded, and directed downward, consistent with County standards and best management practices for light control. As such, the Project will contribute to an overall reduction in artificial illumination and visual glare over time.

Other statewide and regional efforts complement this outcome. For example:

- SB 1137 limits oil operations near homes and schools, indirectly reducing nighttime light exposure in sensitive areas;
- AB 2716 mandates full decommissioning in the Inglewood Oil Field, a potential source of nighttime light in the Baldwin Hills region;
- California Building Code sets energy-efficient lighting standards that reduce glare and light pollution for any future non-oil-related development;
- County Rural Outdoor Lighting District promotes the preservation of dark skies in rural and foothill communities.

As multiple jurisdictions phase out oil production and enhance lighting regulations, the cumulative trend across the region is a reduction in skyglow, glare, and nightlight intrusions, particularly in low-light areas. The Project is consistent with and reinforces this trend.

Because the Project would not introduce new sources of lighting or glare, and because it facilitates the elimination of existing visual intrusions, its contribution to cumulative light and glare impacts is not considerable. When viewed in the context of broader efforts to restore nighttime visual quality and reduce glare from legacy oil infrastructure, the cumulative impact of the project would be less than significant.

5.1.5 Level of Significance Before Mitigation

Based on the analysis presented above, all potential aesthetic impacts resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project will not introduce new permanent visual elements, structures, or sources of light or glare that could degrade scenic vistas, obstruct public views, or conflict with applicable zoning and scenic resource protections.

Any temporary aesthetic effects associated with the decommissioning of existing oil production facilities—such as the presence of equipment, fencing, or lighting—are expected to be localized, short in duration, and typical of standard construction activity. These effects will be minimized to a less than significant level through mandatory compliance with existing regulations and the Project's own enforceable Project Design Features (PDFs). No potentially significant aesthetic impacts requiring mitigation were identified.

5.1.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse aesthetic impacts. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks. These features include, but are not limited to:

- PDF-AE-1 (Site and Well Identification): Requires clear signage at all sites with operator contact information and agency phone numbers for complaints.

- PDF-AE-2 (Ongoing Site Maintenance): Mandates facilities be maintained in a neat, orderly fashion, free of debris and weeds.
- PDF-AE-3 (Lighting Standards): Requires all temporary and permanent lighting to be minimal, shielded, and directed downward.
- PDF-LU-1 (Decommissioning and Site Restoration Mandate): Establishes a clear, non-discretionary mandate for well plugging, abandonment, and site restoration upon cessation of activities.
- PDF-LU-2 (Decommissioning and Infrastructure Removal): Requires the complete removal of all structures and equipment associated with the oil operation.

Because the Project does not result in significant aesthetic impacts, these PDFs are not acting as CEQA mitigation for this resource topic, but rather provide the enforceable operational mechanisms of the Ordinance to limit short-term visual disruption and achieve long-term visual improvements.

5.1.7 Level of Significance After Mitigation

The Project's impacts related to aesthetics were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant. The Project's aesthetic effects—both individually and cumulatively—are expected to be beneficial over the long term, as incompatible industrial infrastructure is removed and visual character is restored across unincorporated areas of Los Angeles County.

5.1.8 References

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CHAPTER 5.2 AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the potential for the Revised Oil Well Ordinance (the Project) to result in significant impacts to agricultural and forestry resources within unincorporated areas of Los Angeles County, consistent with the California Environmental Quality Act (CEQA) and Appendix G of the CEQA Guidelines. The analysis considers whether implementation of the Project could result in the conversion of important farmland to non-agricultural use, conflict with existing agricultural zoning or Williamson Act contracts, or result in the loss or conversion of forest land or timberland to non-forest uses.

The Revised Oil Well Ordinance is a regulatory action that amends the Los Angeles County Code, the General Plan, and the Newhall Ranch Specific Plan to prohibit new oil wells and production facilities in unincorporated areas, designates existing oil production facilities as nonconforming uses, and establishes performance standards to guide the decommissioning, cleanup, and restoration of existing oil production sites. The Project does not authorize or propose new development, changes to agricultural land use or any zoning, or any direct disturbance to land currently used for farming or forestry.

As a result, the analysis focuses on whether the phase-out of oil infrastructure and related site remediation activities could indirectly affect designated farmland or forest resources, or whether any regulatory changes could inadvertently conflict with existing agricultural policies, zoning, or conservation contracts.

This chapter is organized to provide:

- An overview of applicable federal, state, and local regulations related to agriculture and forestry;
- A summary of the existing environmental conditions in the County, including the location and extent of farmland, grazing lands, and forest land;
- The thresholds of significance used to assess potential project-related impacts under CEQA;
- An evaluation of Project impacts based on the established thresholds; and
- A discussion of cumulative impacts, mitigation measures, and conclusions regarding significance.

This analysis is informed by the following data sources:

- California Department of Conservation Farmland Mapping and Monitoring Program (FMMP);
- County General Plan, including land use designations and conservation policies;

- County zoning maps and Williamson Act Contract Land Map (2017);
- Aerial imagery, GIS datasets, and existing County GIS layers;
- The Revised Oil Well Ordinance Initial Study (March 2025); and
- Relevant Program EIRs prepared for community-based plans throughout unincorporated Los Angeles County.

While the Project's direct effects on agricultural and forestry resources are expected to be minimal, this chapter ensures that potential indirect or cumulative impacts—especially those related to land use compatibility, conservation protections, or land retirement—are thoroughly evaluated in accordance with CEQA.

During the public scoping period, comments were received that related to agriculture. As shown in *Chapter 2*, Table 2-1: Summary of Scoping Comments Received, one commenter noted that the current zoning for the Inglewood Oil Field is "Heavy Agricultural A-2." It was also noted by another commenter that future uses of the land would be unlikely to be limited to agricultural uses. This chapter considers these comments and evaluates the potential for the Project to convert farmland to non-agricultural use or conflict with existing agricultural zoning.

5.2.1 Environmental Setting

5.2.1.1 Regulatory Setting

Federal Regulations

Several federal programs and statutes are aimed at protecting agricultural and forest resources, particularly in the context of land conversion, resource extraction, or federally funded infrastructure. However, none of these programs or laws are directly applicable to the Revised Oil Well Ordinance. The Project is a local regulatory action that amends the Los Angeles County Code and the County General Plan, and it applies only to unincorporated County areas under local land use authority. It does not involve federal lands, federal funding, or federal discretionary approvals, and does not authorize development or land disturbance that could affect resources under federal jurisdiction.

Nonetheless, several federal statutes establish national conservation goals and serve as context for understanding broader efforts to preserve farmland, open space, and forest land.

Farmland Protection Policy Act (FPPA) (7 U.S.C. § 4201 et seq.)

The FPPA is administered by the U.S. Department of Agriculture and is intended to minimize the conversion of farmland to non-agricultural uses as a result of projects receiving federal funding or requiring federal approval. It applies primarily to federal agency actions—such as highway construction, airport expansions, or flood control projects—that would result in farmland

conversion. Because the Revised Oil Well Ordinance is a County-led regulatory action with no federal funding or approvals, the FPPA does not directly apply.

Forest Legacy Program (FLP)

The FLP is a voluntary conservation program administered by the U.S. Forest Service to protect environmentally sensitive private forest lands through the purchase of conservation easements or land acquisition. Forest Legacy Areas (FLAs) are designated by the State in cooperation with the USFS. There are no designated Forest Legacy Areas or FLP-funded lands within the scope of the Revised Oil Well Ordinance. The Project does not affect forested lands or private timberlands enrolled in this federal program.

National Forest Management Act (NFMA)

NFMA governs land use and resource planning on national forest lands managed by the U.S. Forest Service. Within Los Angeles County, portions of the Angeles National Forest and Los Padres National Forest fall under NFMA management. The Revised Oil Well Ordinance does not apply to federally owned lands. As such, NFMA does not directly apply to the Project.

Summary of Federal Agriculture and Forestry Considerations

The Revised Oil Well Ordinance is a local land use policy action that amends the Los Angeles County Code, the County General Plan, and the Newhall Ranch Specific Plan, and applies exclusively to unincorporated areas of Los Angeles County, excluding the Coastal Zone. The Project does not authorize development, grading, or ground disturbance, and it does not involve federal lands, funding, or permitting. Accordingly, no federal agricultural or forestry protection statutes—such as the Farmland Protection Policy Act (FPPA), Forest Legacy Program (FLP), National Forest Management Act (NFMA), or the Federal Land Policy and Management Act (FLPMA)—are directly applicable to the Project.

Additionally, the Project Area does not include any federally managed forest lands, federally designated prime farmland, or private lands enrolled in federal conservation programs. Therefore, the Project will not conflict with or compromise any federal farmland, forest resource, or timberland protections. Instead, by facilitating the phase-out of incompatible oil operations, the Project supports broader conservation objectives aligned with federal policy goals.

State Laws, Regulations, and Policies

California has adopted a number of statutes and programs to protect farmland, preserve agricultural land use, and limit the premature or incompatible conversion of forest and timberland. These state-level frameworks inform CEQA's evaluation of agricultural and forestry resources and help guide local land use decisions. While the Revised Oil Well Ordinance does not propose physical development or land use changes that would conflict with these regulations, this section describes relevant policy frameworks for context.

Farmland Mapping and Monitoring Program (FMMP)

The Farmland Mapping and Monitoring Program (FMMP) is administered by the California Department of Conservation and provides statewide data on the location, quality, and status of agricultural lands. The FMMP classifies land into several categories based on soil quality and agricultural viability, including:

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Grazing Land
- Urban and Built-Up Land

The FMMP's classifications are based in part on federal soil survey data from the U.S. Department of Agriculture Natural Resources Conservation Service (NRCS), and the program is designed to support local and regional planning efforts.

Within unincorporated Los Angeles County, limited FMMP-mapped farmland is primarily concentrated in the Antelope Valley, Santa Clarita Valley, and select portions of the Santa Monica Mountains. These areas are generally characterized by limited water availability, sloping terrain, or marginal soils, and are often used for low-intensity grazing, dryland farming, or left as undeveloped open space.

The Revised Oil Well Ordinance does not propose the conversion of any designated farmland to non-agricultural uses and does not affect FMMP-designated areas. The vast majority of historically active or existing oil production sites in unincorporated County areas do not overlap with FMMP-classified lands.

California Land Conservation Act of 1965 (Williamson Act)

The Williamson Act (Government Code §§ 51200–51297.4) is a voluntary program that allows local governments to enter into contracts with private landowners to restrict land to agricultural and open space uses in exchange for reduced property tax assessments. The goal of the program is to discourage the premature or unnecessary conversion of agricultural land to urban uses and to maintain agricultural viability across California.

Although aligned with the conservation goals of federal programs such as the Farmland Protection Policy Act (FPPA), the Williamson Act is implemented exclusively at the local level by participating counties and cities.

In Los Angeles County, enrollment in the Williamson Act has declined over time and is now limited primarily to Santa Catalina Island. There are no active Williamson Act contracts in areas affected

by the Revised Oil Well Ordinance. Therefore, the Project will not conflict with any existing Williamson Act contracts, nor will it result in the conversion of contracted agricultural land.

Timberland and Timberland Production Zones (TPZs)

Under Government Code § 51104(g), Timberland Production Zones (TPZs) are areas designated for long-term timber harvesting and production. Additional definitions for forest land and timberland are provided in Public Resources Code §§ 4526 and 12220(g). CEQA requires lead agencies to evaluate the potential for a project to convert or otherwise impact these resource types.

There are no TPZ-designated lands in unincorporated Los Angeles County, nor are there lands within the Project Area that meet the statutory definitions of forest land or timberland. The Revised Oil Well Ordinance does not authorize or result in forest clearing, timber harvesting, or the conversion of forest land to other uses.

California Environmental Quality Act (CEQA) – Agriculture and Forestry Impact Analysis

CEQA Guidelines Appendix G includes criteria for evaluating whether a project would convert farmland, conflict with zoning for agricultural use, or result in the loss of forest resources. These criteria guide the structure of this chapter.

Summary of State Agriculture and Forestry Considerations

The Revised Oil Well Ordinance is a regulatory land use initiative that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to phase out oil production and prohibit new oil wells in unincorporated areas. It does not propose physical development, grading, or land use changes, and does not affect any lands classified as Prime Farmland, Williamson Act contract land, forest land, or timberland.

The Project is consistent with state-level planning frameworks that promote the conservation of agricultural and open space resources and poses no conflict with programs such as the FMMP, Williamson Act, or TPZ land designations. As such, no impacts to state-protected agricultural or forestry resources are anticipated.

Local Regulations

Los Angeles County regulates agriculture and forestry resources through a combination of land use policy, zoning ordinances, and area-specific planning frameworks. These regulatory tools are designed to preserve open space, prevent premature conversion of farmland, and avoid incompatible land uses near agricultural and forested areas. The Revised Oil Well Ordinance—by prohibiting new oil wells and phasing out existing oil production facilities in unincorporated areas—does not alter the County's zoning designations nor does it involve any physical development that would conflict with established protections for agriculture or forestry. This section summarizes the

key local regulations and policy frameworks relevant to the conservation of agricultural and forest resources.

Los Angeles County Code, Title 22 – Planning and Zoning

Chapter 22.16 – Agricultural Zones: This chapter of the Zoning Code governs land uses in zones designated for agricultural purposes, including A-1 (Light Agricultural) and A-2 (Heavy Agricultural). These zones allow for farming, livestock grazing, limited residential uses, and are generally intended to support agricultural viability. Historically, oil and gas production has been an allowable use (either by right or by Conditional Use Permit) within these agricultural zones. The Project explicitly amends Title 22 to prohibit new oil and gas production facilities and phase out existing operations in these zones. The Project does not otherwise rezone any land or authorize new physical development in agricultural areas. While agricultural zoning exists in many parts of unincorporated Los Angeles County—particularly in rural areas such as the Antelope Valley and Santa Clarita Valley—the Revised Oil Well Ordinance does not alter the uses permitted in agricultural zones, except for eliminating oil and gas production facilities.

Division 10 – Community Standards Districts (CSDs): CSDs are zoning overlays that apply customized regulations to specific unincorporated communities. In some areas, including rural areas with agricultural potential, CSDs may contain additional requirements related to land use compatibility, site design, and protection of open space or natural features. The Revised Oil Well Ordinance does not conflict with any CSD regulations related to agricultural land use or natural resource protection.

Title 22 – General Regulations for Open Space and Resource Uses: Provisions elsewhere in the Zoning Code support agricultural viability by limiting incompatible development and maintaining appropriate parcel sizes, setbacks, and land use buffering. The Project does not propose physical development or subdivision of parcels and is consistent with the intent of these regulations.

County of Los Angeles General Plan

The General Plan provides countywide policies that guide the conservation of farmland, rural land, and open space. The Plan also identifies Agricultural Resource Areas (ARAs) and policies to support agricultural viability. The Revised Oil Well Ordinance is consistent with the General Plan's overarching goals for environmental stewardship, rural preservation, and land use compatibility.

The following General Plan goals and policies are directly relevant to the protection of agricultural and forestry resources:

- Goal C/NR 8: Productive farmland that is protected for local food production, open space, public health, and the local economy.
    - Policy C/NR 8.1: Protect Agricultural Resource Areas (ARAs) and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance from encroaching development and discourage incompatible adjacent land uses.

    - Policy C/NR 8.2: Discourage land uses in ARAs and other farmland categories that are incompatible with agricultural activities.
    - Policy C/NR 8.3: Encourage agricultural activities within ARAs.
- Goal C/NR 4: Conserved and sustainably managed woodlands.
    - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands with a goal of no net loss.
- Goal LU 6: Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.
    - Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with community character.

The Revised Oil Well Ordinance is consistent with these goals and policies and contributes to the General Plan's long-term vision by phasing out industrial uses within or near designated agricultural zones and designated conservation and open space areas.

Summary of Local Agriculture and Forestry Considerations

The Revised Oil Well Ordinance is consistent with the County's zoning regulations and General Plan policies. The Project does not authorize any new development or conversion of land from agricultural to non-agricultural use. Instead, the Project supports General Plan policies to preserve rural character, protect farmland from incompatible uses, and prevent industrial development from intruding into areas intended for agricultural or open space uses. Additionally, the project does not impact any mapped Agricultural Resource Areas (ARAs), timberland production zones, or areas designated for woodland conservation.

By facilitating the removal of industrial oil infrastructure from unincorporated areas—many of which lie adjacent to or within Agricultural Zones—the Revised Oil Well Ordinance furthers the County's goals to preserve land for agricultural viability, reduce land use conflicts, and promote a more sustainable rural landscape. The Project also supports Goal C/NR 1 to conserve open space areas for natural and agricultural functions and Goal C/NR 2 to coordinate with public and nonprofit partners to preserve rural landscapes and working lands. As such, the Project is aligned with local regulations and land use policy goals concerning agriculture and forestry.

5.2.1.2 Existing Environmental Conditions

The Revised Oil Well Ordinance applies to unincorporated areas of Los Angeles County except the Coastal Zone. These areas encompass a wide range of rural, suburban, and urban landscapes and include significant agricultural regions, particularly within the Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains, as well as forest-adjacent lands near Angeles and Los Padres National Forests. The Project Area spans multiple Planning Areas, many of which contain open space, grazing land, or farmland of local and regional importance, as identified by the California Department of Conservation and the County General Plan.

Agricultural Land Uses

Agricultural land within unincorporated Los Angeles County includes a mix of dryland farming, irrigated crops, orchards, and extensive grazing operations. The most agriculturally productive areas are located in:

- The Antelope Valley, where large rural parcels support grazing, field crops, and intermittent cultivation;
- The Santa Clarita Valley, which includes pockets of farmland and horse-oriented agricultural uses along the foothills and valley floor; and
- The Santa Monica Mountains, which support vineyards, equestrian facilities, and small-scale agriculture consistent with steep topography and conservation zoning.

In total, approximately 53,000 acres of land in unincorporated County areas are mapped as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Grazing Land under the Farmland Mapping and Monitoring Program (FMMP). However, many of these lands are subject to natural constraints—such as limited water supply, slope, and soil type—that restrict intensive production.

Within these regions, active oil production facilities are often located on hillsides and may include unpaved access roads or disturbed pads within parcels that are otherwise zoned for agricultural or rural land uses. These oil-related features can fragment agricultural land, reduce usable acreage, and generate land use conflicts with adjacent agricultural operations.

The Revised Oil Well Ordinance does not propose the conversion of farmland or authorize land development. Instead, it facilitates the removal of oil infrastructure across the unincorporated Los Angeles County, including areas where agriculture is the prevailing or planned land use and thus may increase long-term land availability and compatibility for agricultural activities.

Forest Land and Timber Resources

Los Angeles County contains substantial areas of forested land within the Angeles National Forest and portions of the Los Padres National Forest. These areas are federally managed and lie outside the scope of the Revised Oil Well Ordinance. However, the County retains land use authority over privately owned in-holdings within national forests—particularly in areas such as Acton, Agua Dulce, and the Sierra Pelona Mountains. These parcels are generally steep, rugged, and environmentally constrained, with limited development potential.

No lands with existing oil production facilities affected by the Project Area are designated as Timberland Production Zones (TPZs) under Government Code § 51104(g), nor are any classified as timberland or forest land under Public Resources Code §§ 4526 or 12220(g). As such, the Revised Oil Well Ordinance would not affect any lands used for commercial timber harvesting or forest production, and no forest clearing or conversion would result from the project's

implementation. Timber production in Los Angeles County is extremely limited due to steep terrain, lack of market-scale forest resources, and the dominance of federal land ownership in forested regions.

Agricultural Resource Areas and Zoning

The General Plan designates Agricultural Resource Areas (ARAs) as Special Management Areas where farmland is prioritized for protection. ARAs are concentrated in the Antelope Valley and consist of both FMMP-classified farmland and lands under current or historical agricultural production.

The County's Zoning Code (Title 22) designates various zones for agricultural use, including A-1 (Light Agricultural) and A-2 (Heavy Agricultural). These zones allow a range of uses including crop cultivation, livestock, limited residential use, and equestrian activities. The Revised Oil Well Ordinance does not alter any agricultural zoning designations or restrict uses permitted in agricultural zones, except for eliminating oil and gas production facilities as an allowable use in these zones.

Moreover, the Project does not propose any changes to land use designations, parcel boundaries, or infrastructure development that could impact agricultural viability. The Project's removal of industrial oil infrastructure may enhance the long-term viability and visual continuity of agricultural and grazing landscapes.

5.2.2 CEQA Thresholds of Significance

Consistent with the CEQA Guidelines Appendix G, Environmental Checklist, and County practice, the Project would have a significant impact to agriculture and forestry resources if it would:

AF-1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the FMMP maps, to non-agricultural use.

AF-2 Conflict with existing zoning for agricultural use or a Williamson Act contract.

AF-3 Conflict with existing zoning for, or cause rezoning of, forest land or timberland.

AF-4 Result in the loss of forest land or conversion of forest land to non-forest use.

AF-5 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use.

5.2.3 Environmental Impacts

5.2.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). Consistent with the programmatic findings of the CAP PEIR, the phased decommissioning of oil and gas facilities under the Project would not inherently drive the conversion of agricultural or forestry lands. Therefore, this programmatic analysis strictly evaluates whether the incremental short-term impacts—specifically, the physical decommissioning and site restoration activities mandated by the Project that were not fully evaluated in the CAP PEIR—could inadvertently conflict with agricultural zoning or forest land protections. Because the specific activities mandated by this Project are governed by strict Project Design Features (PDFs) and mandate compliance with existing local and state regulations, this analysis focuses on demonstrating how these existing frameworks ensure any short-term impacts remain less than significant without the need for project-specific mitigation.

The evaluation of impacts to agriculture and forestry resources is based on the criteria set forth in Appendix G of the CEQA Guidelines, as well as standard County practices for assessing potential land use and resource conflicts. This analysis evaluates whether the Revised Oil Well Ordinance would result in the direct or indirect conversion of agricultural or forest land to non-resource uses, conflict with land under Williamson Act contract, or otherwise interfere with the preservation or use of land designated for agriculture or forestry.

Because the Revised Oil Well Ordinance is a regulatory land use action that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to phase out oil production and prohibit new oil wells in unincorporated areas, the methodology focuses on whether the project could:

- Facilitate or indirectly cause land use changes in agricultural or forested areas;
- Conflict with existing zoning or conservation designations;
- Remove protections from farmland or timberland;
- Result in changes to land management or infrastructure that could affect the long-term viability of agricultural or forestry uses.

Furthermore, as established in Chapter 3, this EIR does not analyze the speculative impacts of any potential future redevelopment that may occur on decommissioned sites; any such future proposals would be subject to their own independent CEQA review.

This is a policy-level analysis—no individual development or land disturbance is proposed by the Project. Therefore, potential effects are analyzed at a countywide scale, using planning-level data and general assumptions about how the Revised Oil Well Ordinance would be implemented over time.

Data sources and technical references used in this analysis include:

- Farmland Mapping and Monitoring Program (FMMP) data from the California Department of Conservation (latest available update);
- Williamson Act Contract Land Maps (2017) provided by the County of Los Angeles Department of Regional Planning;
- County General Plan, including land use designations and policies;

- Los Angeles County Zoning Code (Title 22);
- Public Resources Code and Government Code definitions for forest land and timberland;
- Aerial imagery and GIS data used to verify land use context;
- Revised Oil Well Ordinance Initial Study (March 2025);
- Applicable EIRs for related County community-based plans.

This methodology also considers planning area context, including the land use characteristics of areas most likely to be affected by the phase-out of oil infrastructure. Where oil operations are co-located with grazing land, dryland farms, or rural land use designations, the analysis evaluates whether the Project could impair or enhance agricultural potential.

The thresholds of significance presented in *Section 5.2.2* provide the framework for the impact analysis in the following sections.

5.2.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide amendment to the Los Angeles County Code (Titles 12 and 22), including the Baldwin Hills Community Standards District (CSD), the County General Plan, and the Newhall Ranch Specific Plan to prohibit the development of new oil wells and designate existing oil wells and associated production facilities as nonconforming uses, subject to a 20-year amortization period. At the end of that amortization period, existing oil operations will be required to cease and be decommissioned in accordance with State and County standards.

Key agriculture- and forestry-related project characteristics include:

- Prohibition of New Oil Wells and Related Facilities: The Revised Oil Well Ordinance prohibits new oil wells, tanks, and associated production infrastructure in unincorporated areas of Los Angeles County except the Coastal Zone. The Project has potential to eliminate for future industrial encroachment into agricultural zones, rural landscapes, or lands adjacent to national forests. By restricting new oil operations, the project prevents conversion or fragmentation of agricultural land that may otherwise occur with continued oil field expansion.
- Designation of Existing Oil Operations as Nonconforming Uses: All existing oil wells and production facilities will be designated as legal nonconforming, and will be phased out over time. Operators will be required to meet ongoing performance standards to ensure site maintenance, compatibility with surrounding land uses, and protection of natural or working landscapes during the amortization period. No intensification, expansion, or redevelopment of these facilities will be permitted.
- Decommissioning and Site Restoration Requirements: Upon cessation of oil operations, sites must be properly decommissioned and restored. This includes well plugging, equipment removal, and vegetation management. In areas zoned for agriculture or designated as Agricultural Resource Areas (ARAs), decommissioned sites may become more compatible with future or resumed agricultural uses, including grazing or dryland

farming. The Project does not mandate land use conversion but may facilitate the long-term viability of existing agricultural land.

- Avoidance of Forest Lands and Timber Production Zones (TPZs): The Project does not apply to federally managed forest lands, nor does it affect any lands designated as Timberland Production Zones under Government Code § 51104(g). In-holdings within national forest boundaries are subject to the County's jurisdiction; however, no oil production facilities on or adjacent to designated forest lands are known to the County. Therefore, the Revised Oil Well Ordinance would not result in the conversion or disturbance of forest land or timber resources.
- Application Across Diverse Rural and Agricultural Contexts: The Project applies to all unincorporated areas of Los Angeles County (except the Coastal Zone), including agriculturally designated lands in the Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains, where legacy oil infrastructure may be co-located with low-intensity grazing or open space uses. These areas are often mapped as Grazing Land under the Farmland Mapping and Monitoring Program (FMMP) or zoned for agricultural activity. The phase-out of oil infrastructure in these areas reduces potential land use conflicts and enhances long-term consistency with County policies that promote agricultural viability and rural character.

The Revised Oil Well Ordinance is anticipated to support the preservation of agricultural and open space lands by eliminating incompatible industrial land uses in areas where agriculture, grazing, or conservation uses are prioritized. The Project is not expected to result in the conversion of farmland to non-agricultural uses, nor will it impact forest land or timberland production zones. Subsequent sections of this chapter evaluate the Revised Oil Well Ordinance's potential impacts relative to each CEQA significance threshold for agriculture and forestry, considering both policy and land use implications at a countywide scale.

5.2.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated areas of Los Angeles County. The project amends the Los Angeles County Code, the General Plan, and the Newhall Ranch Specific Plan to designate existing oil wells and related infrastructure as legally nonconforming uses, subject to a 20-year amortization period. During and after this period, affected oil production sites must be decommissioned and restored in accordance with enforceable performance standards related to well plugging, surface restoration, bonding, maintenance, and signage.

From an agricultural and forestry resources standpoint, the project is expected to result in two primary types of effects:

- Short-term site management and restoration activities, which may occur during the decommissioning of existing oil operations. These activities—such as equipment removal, grading, or vegetation clearing—would be temporary, localized, and similar in scale to

routine construction or maintenance, with no expected interference with active agricultural operations or designated conservation lands.
- Long-term land use compatibility improvements, including the removal of oil infrastructure from lands zoned for agriculture, located within Agricultural Resource Areas (ARAs), or adjacent to open space or grazing areas. These changes are anticipated to reduce land use conflicts, eliminate industrial intrusions in rural areas, and enhance the viability of agricultural or open space uses over time.

The Revised Oil Well Ordinance does not authorize land development, grading, or rezoning of agricultural or forest lands, nor does it involve any activity on federally managed lands, Williamson Act contract lands, or timberland production zones (TPZs). As such, the analysis focuses on the Project's potential to conflict with existing zoning, indirectly contribute to land use changes, or facilitate more compatible uses of resource-designated lands.

This section evaluates the Project's potential impacts relative to each of the CEQA thresholds of significance identified in Section 5.2.2, using a qualitative, countywide approach that considers:
- The spatial relationship between oil infrastructure and agricultural or forest resources;
- Applicable zoning and General Plan designations;
- Relevant state and local policy frameworks;
- And the potential for indirect or cumulative impacts due to land use compatibility or infrastructure changes.

The analysis is informed by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP), County zoning data, Williamson Act maps, and other planning documents, and reflects best available information on existing conditions and future trends.

Impact 5.2-1: Would the proposed Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the FMMP maps, to non-agricultural use? [Threshold AF-1]
No Impact.

The Revised Oil Well Ordinance is a Countywide land use regulation that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to prohibit the establishment of new oil wells and production facilities and to phase out existing oil operations in unincorporated areas through a 20-year amortization period. The Project is regulatory and policy-based, and it does not authorize or involve any physical development, land disturbance, or zoning changes that would result in the conversion of farmland to non-agricultural use.

According to the Farmland Mapping and Monitoring Program (FMMP) maintained by the California Department of Conservation, unincorporated Los Angeles County contains limited acreage of designated Prime Farmland, Farmland of Statewide Importance, and Unique Farmland, primarily located in the Antelope Valley, Santa Clarita Valley, and select portions of the Santa Monica

Mountains. Most of this land is used for dryland farming, low-intensity grazing, or remains as undeveloped open space, often constrained by slope, soil quality, and water availability.

The Revised Oil Well Ordinance does not propose any changes in land use designations or zoning that would allow for the conversion of these farmlands to non-agricultural uses. Instead, the Project would reduce future oil and gas development potential by prohibiting new industrial oil operations and requiring the phased removal of existing oil-related infrastructure in these areas. Over time, this could result in improved compatibility with agricultural uses and land conservation objectives.

Moreover, the Project is consistent with General Plan Policy C/NR 8.1, which calls for the protection of Prime Farmland and other FMMP-classified lands from encroaching development and incompatible land uses. The Project also supports Policy C/NR 8.2, which discourages non-agricultural land uses in designated farmland areas.

While oil production infrastructure may be present on some parcels near FMMP-designated farmland, these facilities are typically clustered on small, disturbed pads within larger parcels and represent a minor share of the total acreage. The removal of such facilities under the Project may increase the future utility of these parcels for passive, grazing, or agricultural uses, though such changes would be at the discretion of the landowner and subject to existing zoning.

In summary, the Project:

- Does not convert any FMMP-designated farmland to non-agricultural use;
- Does not enable land use intensification, subdivision, or development;
- May enhance long-term agricultural potential by eliminating industrial encroachments.

For these reasons, implementation of the Revised Oil Well Ordinance would result in no impact related to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance under CEQA.

Impact 5.2-2: Would the proposed Project conflict with existing zoning for agricultural use or a Williamson Act contract? [Threshold AF-2]

No Impact.

The Revised Oil Well Ordinance is a countywide regulatory action that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to prohibit the development of new oil wells and to phase out existing oil production operations in unincorporated areas, excluding the Coastal Zone. The Project does not propose or authorize rezoning of land, and it does not affect permitted agricultural uses within areas zoned for agriculture under Title 22 (Planning and Zoning) of the Los Angeles County Code, except by removing oil and gas facilities from these zones.

Agricultural zones in unincorporated areas—including A-1 (Light Agricultural) and A-2 (Heavy Agriculture)—allow for farming, livestock grazing, and other rural land uses. While some existing oil operations are located on or near parcels with agricultural zoning, the Project would not introduce incompatible land uses. On the contrary, the phase-out of oil production and associated

industrial activities would reduce land use conflicts in these areas by removing equipment, infrastructure, and operations that may interfere with agricultural activities, such as cultivation, grazing, or land conservation.

In addition, the Project is consistent with County policy objectives to reduce industrial intrusion into rural and agricultural communities, particularly in areas designated as Agricultural Resource Areas (ARAs) under the General Plan. The removal of oil operations from these zones may support the long-term viability of agricultural operations and is consistent with the following adopted General Plan policies:

- Policy C/NR 8.1: Protect Agricultural Resource Areas (ARAs) and other land identified as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance from encroaching development and discourage incompatible adjacent land uses.
- Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with community character.

The Project would also not result in any impacts to Williamson Act properties. Lands under Williamson Act contracts are limited in Los Angeles County and are primarily located on Santa Catalina Island, where conservation easements and preservation agreements are in place. There are no active oil wells or oil production operations (or known oil and gas reserves) within or adjacent to Williamson Act-enrolled properties, and the Revised Oil Well Ordinance does not authorize development or land use changes that would affect contract-enrolled lands.

Therefore, the Project would not conflict with existing agricultural zoning or Williamson Act contracts, and it may enhance compatibility with agricultural land uses over time by removing industrial activities from rural settings. For these reasons, there is no impact under CEQA.

Impact 5.2-3: Would the proposed Project conflict with existing zoning for, or cause rezoning of, forest land or timberland? [Threshold AF-3]

No Impact.

The Revised Oil Well Ordinance does not propose, authorize, or require any changes to zoning designations related to forest land, timberland, or Timberland Production Zones (TPZs), as defined under Government Code § 51104(g) and Public Resources Code §§ 4526 and 12220(g). The Project is a regulatory action that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to prohibit the establishment of new oil wells and to phase out existing oil production operations through an amortization period and decommissioning mandate. It does not authorize physical development, subdivision, or changes to zoning designations.

Within Los Angeles County, forested areas are concentrated in the Angeles National Forest and Los Padres National Forest, both of which are under federal jurisdiction and not subject to County zoning or the proposed provisions of the Revised Oil Well Ordinance. In addition, there are no lands within unincorporated County jurisdiction that are zoned or designated for timber production or forestry. The County's zoning code does not include TPZs, and no private or County-managed forest lands are affected by the Project.

Privately owned in-holdings within national forest boundaries are subject to County land use regulations; however, none of these parcels are zoned or managed for forestry, and no oil production facilities are located within or adjacent to forest-zoned lands.

The Revised Oil Well Ordinance does not affect any other forest policies or regulations applicable to forests or forest-adjacent areas, and would not conflict with any General Plan goals or policies related to woodland conservation, including:

- Goal C/NR 4: Conserved and sustainably managed woodlands
    - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands with a goal of no net loss.

Because the Project does not affect zoning for forest or timberland uses, does not result in any zoning amendments or reclassifications in forested areas, and would not interfere with the conservation or use of forest lands, there would be no impact related to this threshold under CEQA.

Impact 5.2-4: Would the proposed Project result in the loss of forest land or conversion of forest land to non-forest use? [Threshold AF-4]

No Impact.

The Revised Oil Well Ordinance would not result in the loss, clearing, disturbance, or conversion of forest land, as defined in Public Resources Code § 12220(g). The Project is a non-development regulatory initiative that amends the Los Angeles County Code, General Plan, and Newhall Ranch Specific Plan to prohibit new oil wells and designate existing oil production facilities in unincorporated areas as nonconforming uses, subject to a 20-year amortization period. It does not authorize construction, land clearing, grading, or changes in allowable land uses that could lead to the conversion of forest land to non-forest uses.

There are no designated Timberland Production Zones (TPZs) or lands zoned for timber resource management within unincorporated Los Angeles County's jurisdiction. Forested areas that do exist—such as in the Angeles National Forest and Los Padres National Forest—are located on federal lands, which are outside the County's zoning authority and excluded from the scope of the Project.

In addition, the Revised Oil Well Ordinance does not apply to any sites that contain forested vegetation or that are used for commercial timber harvesting. The Project imposes restrictions on industrial oil production, not on land uses related to forestry, and it does not allow for or incentivize the conversion of existing forest land to residential, commercial, or other urban uses.

The project is also consistent with the County General Plan, including:

- Goal C/NR 4: Conserved and sustainably managed woodlands, and
    - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands with a goal of no net loss.

By removing incompatible industrial operations over time, the Revised Oil Well Ordinance may indirectly support the long-term protection of forest-adjacent natural landscapes, particularly in areas where oil infrastructure currently borders conservation land, open space, or hillside woodland.

In summary:

- The Project does not include or affect any forest land;
- It does not result in development or vegetation removal beyond the removal of existing oil production infrastructure;
- And it does not permit or encourage the conversion of forest land to non-forest uses.

Therefore, implementation of the Project would result in no impact under CEQA with respect to the loss or conversion of forest land.

Impact 5.2-5: Would the proposed Project Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use? [Threshold AF-5]

No Impact.

This threshold is intended to capture indirect or cumulative environmental changes that, while not involving the direct conversion of farmland or forest land, could reasonably lead to such outcomes—such as introducing incompatible adjacent uses, modifying access or infrastructure in a way that encourages conversion, or changing policy direction in rural or resource-conservation areas.

The Revised Oil Well Ordinance does not introduce any new uses, infrastructure, development, or changes in land use intensity that would indirectly pressure the conversion of agricultural or forest lands. Instead, the project:

- Prohibits new oil well development; and,
- Phases out existing oil production infrastructure through a 20-year amortization period, with no associated development entitlement or land use reclassification.

The Project applies to unincorporated areas of Los Angeles County (excluding the Coastal Zone), including some areas mapped as Grazing Land, Farmland of Local Importance, or rural open space, primarily in the Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. In these areas, legacy oil infrastructure—such as tanks, pump jacks, and access roads—may coexist with grazing or passive open space uses. Rather than triggering conversion, the Project would reduce the potential for land use conflicts and may help preserve the long-term viability of these rural landscapes by removing incompatible industrial features.

Additionally, the Project does not modify any infrastructure systems, such as roads, utilities, or water delivery systems, in a manner that would make agricultural or forest lands more susceptible to subdivision, urbanization, or other non-resource uses. The Project does not change land use

designations, zoning standards (beyond prohibiting oil wells and production facilities), or parcel configurations, and it does not facilitate speculative land development in rural or agricultural areas.

Furthermore, the Project is consistent with multiple policies in the County General Plan that seek to discourage the conversion of farmland and protect rural resource areas, including:

- Policy C/NR 8.1: Protect Agricultural Resource Areas (ARAs)...from encroaching development and discourage incompatible adjacent land uses;
- Policy C/NR 8.2: Discourage land uses in ARAs...that are incompatible with agricultural activities;
- Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with community character.

In summary:

- The Project would not introduce land use changes or infrastructure that could cause the indirect conversion of farmland or forest land;
- It would remove industrial uses that may currently pose land use compatibility concerns;
- And it removes incompatible industrial infrastructure, thereby removing a potential barrier to the long-term preservation of rural and resource-designated lands in unincorporated areas.

As such, the Revised Oil Well Ordinance would result in no impact under this threshold.

5.2.4 Cumulative Impacts

This section evaluates whether the Revised Oil Well Ordinance (the Project), when considered in combination with other past, present, or reasonably foreseeable future projects, would result in cumulatively considerable impacts to agricultural and forestry resources, consistent with CEQA Guidelines Section 15130.

Cumulative impacts may occur when the incremental effect of a project, considered together with the effects of other projects, contributes to a significant environmental impact in the region—even if the project's direct impacts are individually less than significant.

The analysis of cumulative impacts to agriculture and forestry considers both:

- Ongoing regional land use trends, such as the gradual conversion of farmland to non-agricultural uses; and
- The potential for the Project to contribute to these trends through indirect effects or policy changes.

5.2.4.1 Cumulative Conditions in Los Angeles County

Unincorporated Los Angeles County includes limited areas of designated farmland, primarily in the Antelope Valley, Santa Clarita Valley, and Santa Monica Mountains. These lands are identified in the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP)

as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and are subject to development pressures from population growth, infrastructure expansion, and market-driven land use changes.

Although the County's General Plan and Zoning Code contain policies to protect farmland and rural character—including Agricultural Resource Areas (ARAs) and agricultural zoning districts—cumulative impacts to farmland may still result over time due to fragmentation, reduced viability of agricultural operations, or gradual land use conversion.

Similarly, regional conversion of forest land or timberland is not considered a major cumulative issue in Los Angeles County, as the vast majority of forested areas are located on federally managed lands, which are not zoned or designated for development. No Timberland Production Zones (TPZs) exist in the unincorporated County.

5.2.4.2 Project Contribution to Cumulative Impacts

The Revised Oil Well Ordinance is a regulatory action that prohibits new oil well development and phases out existing oil operations over a 20-year amortization period. It does not authorize development, grading, or rezoning, and does not adversely impact any lands designated as Prime Farmland, forest land, or Timberland Production Zones (TPZs). Instead, it supports long-term agricultural and rural land use goals by:

- Prohibiting new industrial oil and gas operations from encroaching into rural or agricultural areas;

Mandating the decommissioning and site restoration of legacy oil infrastructure (PDF-LU-1 and PDF-LU-2), which eliminates an existing non-agricultural industrial use;

- Removing legacy oil infrastructure that currently limits or conflicts with grazing and other agricultural activities;
- Requiring site restoration upon decommissioning, which may restore passive or agricultural land uses over time; and
- Supporting General Plan Policy C/NR 8.1, which seeks to protect farmlands from incompatible adjacent development.

The Project is also consistent with statewide planning goals to conserve working lands and open space as expressed in programs such as the California Farmland Conservation Strategy and General Plan Guidelines for Agricultural Resource Management issued by the Office of Land Use and Climate Innovation. While these frameworks are advisory, they reinforce the County's land use strategy to preserve rural and agricultural uses over the long term.

When considered in the context of broader regional land use trends and resource protection policies, the Revised Oil Well Ordinance would not result in or contribute to the loss, fragmentation, or conversion of agricultural or forest lands. Rather, it would eliminate non-agricultural industrial intrusions, consistent with the long-term conservation goals of the County's General Plan. Accordingly, the Project would result in no cumulatively considerable impacts to agriculture or forestry resources under CEQA.

Furthermore, the Project is the direct implementation of the Los Angeles County 2045 Climate Action Plan (CAP) Measure ES1. The CAP PEIR concluded that the programmatic, countywide implementation of decarbonization strategies, including the phase-out of fossil fuels, would not cumulatively result in the loss or conversion of agricultural or forestry resources. The Project's targeted decommissioning activities are entirely consistent with this cumulative finding.

5.2.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to agricultural and forestry resources resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project does not involve land development, grading, or rezoning that would convert farmland, forest land, or timberland to other uses, nor would it conflict with agricultural zoning, Williamson Act contracts, or General Plan goals related to farmland or woodland preservation.

Instead, the Project's primary long-term effect is a beneficial reduction in incompatible industrial uses in rural and agricultural settings, which may enhance the long-term viability of resource lands in unincorporated Los Angeles County. Any temporary, short-term activities associated with the decommissioning of existing oil production facilities are managed through mandatory compliance with existing comprehensive federal, state, and local regulations, as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.2.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to agricultural or forestry resources. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks.

Specifically, PDF-LU-1 (Decommissioning and Site Restoration Mandate) and PDF-LU-2 (Decommissioning and Infrastructure Removal) govern the general decommissioning process and ensure that upon the cessation of operations, sites are properly plugged, abandoned, and restored, eliminating the industrial use from the landscape. Because the Project does not directly or indirectly result in significant impacts to agricultural or forestry resources, these PDFs are not acting as CEQA mitigation for this resource topic.

5.2.7 Level of Significance After Mitigation

The Project's impacts related to agricultural and forestry resources were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after

mitigation remains less than significant. The Project would not result in the conversion of farmland or forest land, would not conflict with zoning or conservation policies, and would not contribute to any cumulatively considerable impact on agriculture or forestry in Los Angeles County.

5.2.8 References

California Department of Conservation

Farmland Mapping and Monitoring Program (FMMP) (2020).

Williamson Act Contract Land Map (2017).

California Government Code

Section 51104(g) – Timberland Production Zones.

Sections 51200–51297.4 – California Land Conservation Act (Williamson Act).

California Public Resources Code

Section 4526 – Definition of Forest Land.

Section 12220(g) – Definition of Timberland.

Governor's Office of Planning and Research (OPR) / Office of Land Use and Climate Innovation. (LCI)

General Plan Guidelines for Agricultural Resource Management.

California Farmland Conservation Strategy.

Los Angeles County Department of Regional Planning

Los Angeles County General Plan 2035, including Land Use Element and Conservation and Natural Resources Element.

Final Environmental Impact Report for the Baldwin Hills Community Standards District. Prepared by Marine Research Specialists, 2008.

Environmental Impact Reports for relevant Los Angeles County Area and Community Plans.

Title 22 – Planning and Zoning, Los Angeles County Code. Community Standards Districts (CSDs).

Williamson Act Contract Land Map (2017).

Revised Oil Well Ordinance Initial Study. March 2025.

2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

United States Department of Agriculture (USDA)

Natural Resources Conservation Service (NRCS) – Soil Survey Data.

Farmland Protection Policy Act (FPPA), 7 U.S.C. § 4201 et seq.

United States Forest Service (USFS)

Forest Legacy Program (FLP).

National Forest Management Act (NFMA).

CEQA Guidelines

Appendix G: Environmental Checklist.

Section 15130 – Cumulative Impacts.

Other Sources

Aerial imagery and GIS datasets from the County of Los Angeles and California Department of Conservation.

CHAPTER 5.3 AIR QUALITY

This section evaluates the potential for the Revised Oil Well Ordinance (the Project) to result in significant impacts to air quality in unincorporated areas of Los Angeles County, consistent with the California Environmental Quality Act (CEQA) and applicable air quality regulations. The analysis considers both regional emissions of criteria air pollutants and localized air quality impacts, with particular attention to temporary emissions during decommissioning activities and long-term effects associated with the elimination of oil production operations.

Air quality conditions in Los Angeles County are regulated by two regional air districts:

- The South Coast Air Quality Management District (SCAQMD), which oversees the southern portion of the County as part of the South Coast Air Basin; and
- The Antelope Valley Air Quality Management District (AVAQMD), which governs the high desert region in the northern portion of the County.

Existing oil production facilities in the unincorporated County are primarily located in the South Coast Air Basin.

These air districts implement federal and state air quality standards and provide recommended CEQA thresholds of significance, emissions modeling methodologies, and mitigation strategies. This section relies on their guidance to assess whether the Revised Oil Well Ordinance would conflict with air quality standards, contribute to existing violations, expose sensitive receptors to substantial pollutant concentrations, or result in emissions of hazardous or odorous air pollutants.

Because the Project is a regulatory action that prohibits new oil wells and requires the phase-out and decommissioning of existing oil production facilities, it will not result in new development, roadway expansion, or increased vehicle use. Transportation-related emissions (e.g., vehicle miles traveled or VMT) are expected to decline or remain stable over time.

This analysis focuses on:

- Short-term, localized emissions associated with temporary decommissioning and site restoration activities; and
- Long-term reductions in stationary-source emissions (e.g., engines, flares, separators, fugitive emissions) and indirect mobile-source emissions (e.g., employee and service trips) from oil field operations.

The Project's emissions were qualitatively evaluated using SCAQMD-recommended methodologies, including assumptions about equipment type and duration of activity based on

representative decommissioning processes. Emission estimates are summarized in *Section 5.3.4* and reflect a conservative, policy-level assessment of Project-related air quality impacts. This section is organized to include:

- A summary of applicable federal, state, and regional regulations (*Section 5.3.1*);
- A description of existing air quality conditions in the Project Area (*Section 5.3.2*);
- Identification of applicable CEQA significance thresholds (*Section 5.3.3*); and
- An evaluation of short-term and long-term air quality impacts (*Section 5.3.4*), including cumulative effects.

The County received numerous comments regarding air quality, which reflected a wide range of viewpoints (see *Chapter 2*, Table 2-1: Summary of Scoping Comments Received). Some commenters, including the LA County Coalition and other individuals, supported the Project, stating it would improve local air quality by eliminating pollution from oil wells located near homes and schools. Other commenters, representing the oil and gas industry, argued that the Project would worsen regional air quality by causing an increase in oil imports via tanker ships, which would create more pollution at the Ports of Los Angeles and Long Beach. This *Section 5.3* provides an analysis that is responsive to these comments, addressing potential effects on both local and regional air quality.

5.3.1 Environmental Setting

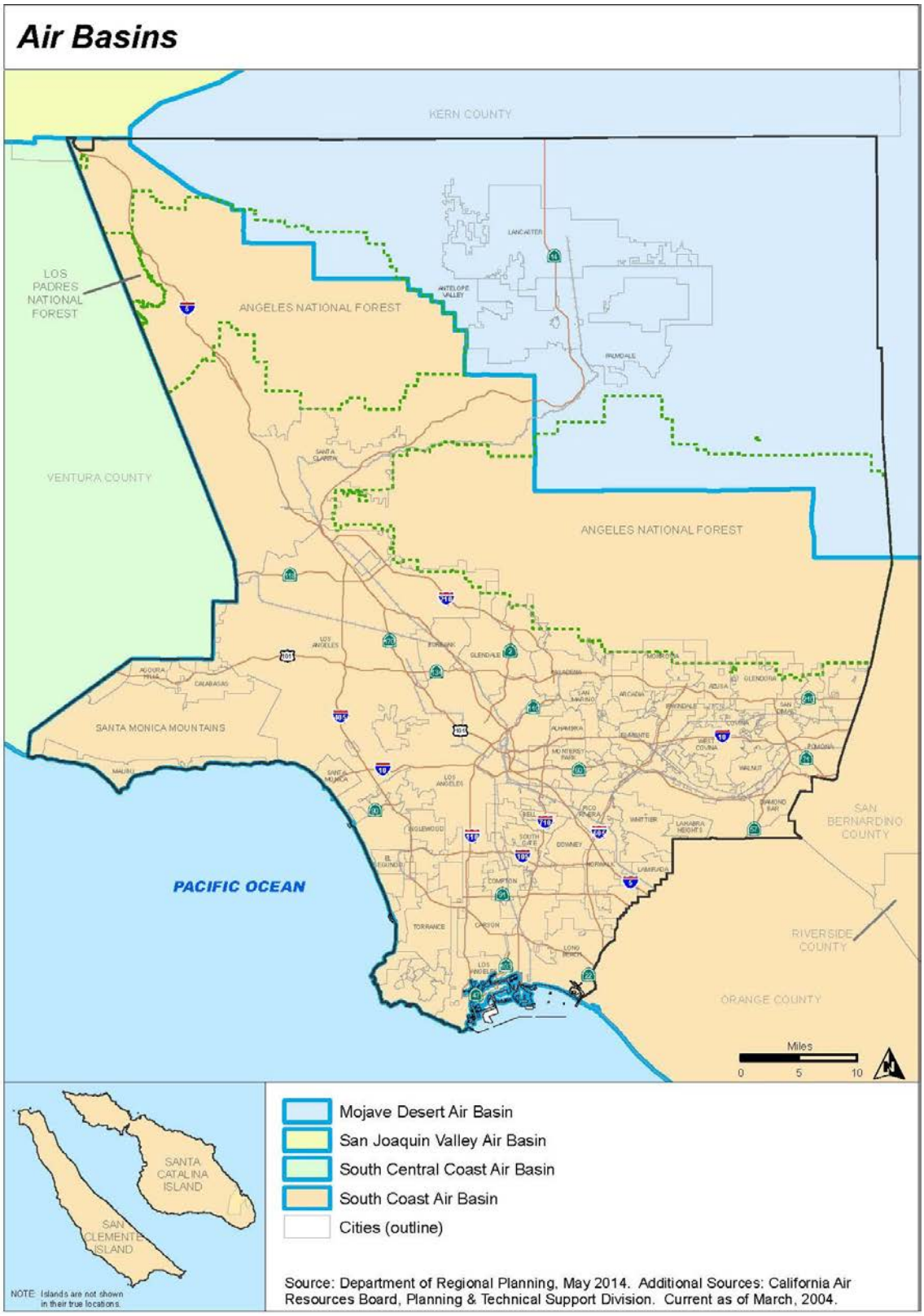
5.3.1.1 Regulatory Setting

Los Angeles County is subject to a range of federal, state, and regional air quality regulations designed to protect public health and minimize emissions of air pollutants. Ambient air quality standards (AAQS) have been established by both the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) to set acceptable concentration levels for criteria air pollutants, including ozone (O3), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), particulate matter (PM10 and PM2.5), and lead (Pb). In addition to criteria pollutants, both federal and state agencies regulate toxic air contaminants (TACs), which may pose localized health risks even at low concentrations.

Los Angeles County spans two distinct air basins (see Figure 5.3-1):

- The South Coast Air Basin (SoCAB), which includes most of the County's metropolitan areas, and is overseen by the South Coast Air Quality Management District (SCAQMD); and
- The Mojave Desert Air Basin (MDAB), covering the County's high desert and Antelope Valley regions, which is managed by the Antelope Valley Air Quality Management District (AVAQMD).

Figure 5.3-1, Air Basins



Depending on a Project's location within the County, air quality impacts are evaluated against the rules and thresholds established by SCAQMD or AVAQMD, along with applicable state and federal standards. Since the Revised Oil Well Ordinance applies uniformly across all unincorporated areas, it affects both air basins, making the regulations of both air districts relevant to this analysis. However, existing oil and gas production facilities are located almost exclusively in the South Coast Air Basin.

This section summarizes the federal, state, regional, and local laws, regulations, plans, and guidelines that govern air quality in Los Angeles County and that are potentially applicable to the Revised Oil Well Ordinance under CEQA.

Federal Regulations

Air quality in the United States is primarily governed by the Clean Air Act (CAA), which establishes the framework for regulating emissions of air pollutants from stationary and mobile sources at the national level. Enacted in 1963 and substantially amended in 1970, 1977, and 1990, the CAA authorizes the U.S. Environmental Protection Agency (USEPA) to set health-based standards, monitor ambient air quality, and enforce emission limitations.

National Ambient Air Quality Standards (NAAQS)

Under the CAA, the USEPA has established National Ambient Air Quality Standards (NAAQS) for six commonly occurring “criteria air pollutants,” including:

- Ozone (O3);
- Carbon monoxide (CO);
- Nitrogen dioxide (NO2);
- Sulfur dioxide (SO2);
- Particulate matter (PM10 and PM2.5); and
- Lead (Pb).

These standards are designed to protect public health (primary standards) and the environment (secondary standards) with an adequate margin of safety, especially for sensitive receptor populations, such as children, the elderly, individuals with respiratory or cardiovascular disease, and people engaged in strenuous outdoor activities.

Areas that exceed one or more NAAQS are designated as nonattainment areas and are required to implement stricter emission control measures under USEPA oversight. Los Angeles County is part of the South Coast Air Basin (SCAB) and Mojave Desert Air Basin (MDAB)—both of which have nonattainment designations for several criteria pollutants, particularly ozone and fine particulate matter.

New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP)

The CAA also authorizes the USEPA to regulate emissions from specific source categories through the:

- New Source Performance Standards (NSPS), which apply to newly constructed or modified stationary sources; and
- National Emission Standards for Hazardous Air Pollutants (NESHAP), which address emissions of toxic air contaminants (TACs) from industrial facilities, including petroleum operations.

Although the Revised Oil Well Ordinance does not authorize new development, the NESHAP standards provide important context for understanding the air quality risks historically associated with oil production, including emissions of benzene, formaldehyde, toluene, xylene, and other hazardous compounds.

Title V Operating Permits

Major stationary sources of air pollutants—such as some oil production facilities—are subject to Title V of the CAA, which requires they obtain a federally enforceable operating permit. These permits consolidate all applicable emission limitations and monitoring requirements for a facility. Some oil operations in Los Angeles County may operate under Title V permits issued by SCAQMD or AVAQMD.

Under the Revised Oil Well Ordinance, these permitted facilities would be designated as nonconforming uses and subject to a 20-year amortization period, after which they would cease operations and be decommissioned. As such, the Project would result in a reduction in emissions from Title V-regulated sources over time.

General Conformity Rule

The General Conformity Rule ensures that federally funded or approved Projects do not interfere with the implementation of state or regional air quality plans. Because the Revised Oil Well Ordinance does not involve federal funding, land, or discretionary approvals, this rule does not apply.

Summary of Federal Air Quality Considerations

The Revised Oil Well Ordinance does not authorize new stationary sources of air pollution and does not involve the installation or expansion of equipment subject to federal air quality permitting. While oil production activities subject to Title V and NESHAP requirements will continue during the amortization period, these operations will be phased out and decommissioned over time.

As such, the Project is expected to result in a net reduction in emissions from federally regulated sources, with no conflict with the Clean Air Act or any other federal air quality regulatory program.

State Laws, Regulations, and Policies

California has established some of the most rigorous air quality and climate protection policies in the nation, addressing not only criteria air pollutants but also toxic air contaminants (TACs), greenhouse gas (GHG) emissions, and the cumulative burden of pollution in disadvantaged communities. These regulations and policy directives form the context in which CEQA air quality evaluations are conducted. This section summarizes the major state laws and programs relevant to the Revised Oil Well Ordinance and its anticipated air quality outcomes.

California Ambient Air Quality Standards (CAAQS)

The California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS) for the same six criteria pollutants regulated under federal law—ozone (O3), nitrogen dioxide (NO2), sulfur dioxide (SO2), carbon monoxide (CO), particulate matter (PM10 and PM2.5), and lead (Pb)—along with additional standards for:

- Hydrogen sulfide (H2S);
- Vinyl chloride;
- Visibility-reducing particles; and
- Sulfates.

These standards are generally more stringent than their federal counterparts and are intended to protect public health and welfare with an adequate margin of safety, especially for sensitive receptors such as children, the elderly, and individuals with respiratory conditions. Los Angeles County remains nonattainment for several CAAQS pollutants, especially ozone and particulate matter.

California Clean Air Act (1988)

The California Clean Air Act (CCAA) mandates that air districts meet all CAAQS as quickly as possible through enforceable control measures. It requires the development of Air Quality Management Plans (AQMPs) or Attainment Plans, which are coordinated by CARB in partnership with local air districts such as the South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD).

The Project is consistent with the CCAA because it does not introduce new emission sources and will ultimately eliminate stationary source emissions from existing oil production facilities.

Toxic Air Contaminants (TACs) and the Air Toxics Programs

CARB classifies and regulates toxic air contaminants (TACs) under the Tanner Air Toxics Act (AB 1807) and the Air Toxics “Hot Spots” Information and Assessment Act (AB 2588). Common TACs associated with oil production include:

- Benzene;
- Formaldehyde;
- Toluene; and
- Diesel particulate matter (DPM).

Facilities emitting significant levels of TACs must conduct health risk assessments, notify surrounding communities of elevated risk, and implement risk reduction plans. The Revised Oil Well Ordinance aligns with these programs by requiring the phase-out and removal of sources known to emit TACs, thereby reducing long-term public exposure—particularly in communities near urban oil fields.

California Global Warming Solutions Act (AB 32, 2006) and Successor Legislation

While GHG emissions are addressed in detail in *Section 5.7*, it is relevant to note that the Revised Oil Well Ordinance supports the California Global Warming Solutions Act (AB 32), as well as:

- Senate Bill 32 (Pavley, 2016) which requires statewide GHG emissions reductions to 40% below 1990 levels by 2030; and
- Executive Order B-55-18 which sets a statewide goal of carbon neutrality by 2045.

The Project's elimination of fossil fuel infrastructure contributes to co-benefits for regional air quality by simultaneously reducing criteria pollutants and climate pollutants from a common set of sources. Because oil production is a major source of methane, carbon dioxide, and co-pollutants like NOX and VOCs, the Project's elimination of these sources supports state climate targets and related air quality improvements.

Assembly Bill 617 – Community Air Protection Program

AB 617 (C. Garcia, 2017) established the Community Air Protection Program, which focuses on reducing air pollution in disadvantaged and overburdened communities through enhanced monitoring, emissions reduction planning, and local enforcement.

Many oil wells in Los Angeles County—including those in the Gateway and Metro Planning Areas—are located near or within AB 617-identified communities. Although not a formal AB 617 plan, the Revised Oil Well Ordinance directly supports the law's intent by removing stationary pollution sources from communities that have historically borne a disproportionate air pollution burden.

Sustainable Communities and Climate Protection Act (SB 375)

Senate Bill 375 (Steinberg, 2008) integrates transportation, land use, and housing planning to reduce vehicle miles traveled (VMT) and associated air pollution and GHG emissions. While the Revised Oil Well Ordinance does not involve new development, it does not conflict with SB 375 and may indirectly support the statute's goals by preventing future fossil fuel intensification in low-density, vehicle-reliant communities.

CARB Oil and Gas Emissions Regulation (Title 17, §95665 et seq.)

CARB has adopted statewide rules targeting fugitive emissions from oil and gas operations, including:

- Leak Detection and Repair (LDAR) requirements;
- Wellhead and separator emissions limits; and
- Reporting and compliance monitoring standards.

By phasing out the facilities regulated under these provisions, the Revised Oil Well Ordinance reduces the stationary pollution sources subject to these rules and accelerates statewide emission reductions.

California State Implementation Plan (SIP)

The State Implementation Plan (SIP) is California's strategy for achieving and maintaining NAAQS. It includes emission control strategies for all major air basins, implemented by CARB and regional air districts. The Revised Oil Well Ordinance is consistent with SIP goals by eliminating stationary sources that contribute to regional nonattainment designations for ozone and particulate matter.

Summary of State Air Quality Considerations

The Revised Oil Well Ordinance aligns with California's air quality and public health goals by:

- Supporting compliance with the California Clean Air Act;
- Eliminating sources of toxic air contaminants;
- Advancing the equity-focused goals of AB 617;
- Reinforcing statewide climate and emissions reduction targets; and
- Contributing to SIP implementation in two nonattainment air basins.

By removing fossil fuel infrastructure and prohibiting new oil development, the Project is not only consistent with but also advances the intent of California's air quality regulatory and policy framework.

Local and Regional Regulations

Air quality within Los Angeles County is managed by two local air quality management districts that operate under authority granted by the California Air Resources Board (CARB):

- The South Coast Air Quality Management District (SCAQMD), which governs the South Coast Air Basin (SCAB); and
- The Antelope Valley Air Quality Management District (AVAQMD), which oversees the Mojave Desert Air Basin (MDAB).

The Project Area spans unincorporated areas of Los Angeles County within both air basins, making the regulations and CEQA guidance of both districts applicable to this analysis.

South Coast Air Quality Management District (SCAQMD)

SCAQMD is responsible for regulating emissions from stationary sources within the South Coast Air Basin, which includes much of Los Angeles County, including oil fields in Baldwin Hills, Pico Canyon, and parts of the Santa Clarita Valley.

Key programs and policies administered by SCAQMD include:

- Rules and Permits: SCAQMD regulates a wide range of stationary sources through a permit system and specific rules. Oil and gas facilities are typically regulated under:
    - Rule 1148.1 – Oil and Gas Production Wells, which requires reporting and controls for well activities;
    - Rule 1173 – Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants;
    - Rule 1401 – New Source Review for Toxic Air Contaminants, which governs risk assessment thresholds for TACs; and
    - Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion Engines.
- Air Quality Management Plan (AQMP): SCAQMD prepares and implements the Air Quality Management Plan (AQMP) for the South Coast Air Basin in coordination with CARB and Southern California Association of Governments (SCAG). The 2022 AQMP sets forth control strategies to attain federal and state air quality standards, particularly for ozone and PM2.5.

The Revised Oil Well Ordinance supports the goals of the AQMP and specific SCAQMD rules by eliminating stationary sources (e.g., tanks, engines, flares, separators) that are subject to local permitting and emissions control requirements. Over time, this would reduce localized emissions and air toxics in communities affected by legacy oil production.

Antelope Valley Air Quality Management District (AVAQMD)

AVAQMD regulates stationary sources in the Antelope Valley, a high desert region in northern Los Angeles County. AVAQMD is responsible for preparing the Federal Attainment Plan for ozone and the Particulate Matter Control Plan in this region.

Relevant AVAQMD rules and guidance include:

- Rule 219 – Exemptions from Permitting, which governs oil well emissions thresholds;
- Rule 431.1 – Sulfur Content of Gaseous Fuels;
- Rule 1303 – New Source Review; and
- CEQA Air Quality Handbook, which provides screening criteria and guidance for evaluating project-level emissions.

County of Los Angeles General Plan

The General Plan includes air quality-related goals and policies in the Air Quality Element, Land Use Element, and Conservation and Natural Resources Element. These policies support local efforts to reduce emissions, protect public health, and ensure consistency with regional air quality plans. Relevant policies include:

- Goal AQ 1: Protection from exposure to harmful air pollutants.

    - Policy AQ 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.
- Goal AQ 3: Address the impacts of climate change and reduce greenhouse gas emissions through climate action and mitigation.
    - Policy AQ 3.8: Develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities.
- Goal LU 6: Protected rural communities characterized by living in a non-urban or agricultural environment at low densities without typical urban services.
    - Policy LU 6.1: Protect rural communities from the encroachment of incompatible development that conflict with existing land use patterns and service standards.

The Revised Oil Well Ordinance is consistent with these policies. By phasing out stationary fossil fuel infrastructure, the Project mandates the decommissioning and removal of emission sources that affect local air quality, particularly in overburdened communities and rural areas with historically limited regulatory oversight. The Project also supports the reduction of land use conflicts between oil operations and adjacent sensitive receptors.

Summary of Local and Regional Air Quality Considerations

The Revised Oil Well Ordinance supports the regulatory and policy objectives of SCAQMD, AVAQMD, and Los Angeles County by:

- Reducing emissions from permitted stationary sources;
- Preventing future emission-generating infrastructure;
- Improving compliance with regional AQMPs; and
- Advancing General Plan goals related to air quality, public health, and environmental justice.

As such, the Project is expected to reduce local and regional air quality burdens over time and is aligned with the local regulatory context governing air emissions in Los Angeles County.

5.3.1.2 Existing Environmental Conditions

Air quality conditions in Los Angeles County are among the most closely monitored and regulated in the nation due to the region's long-standing challenges with ozone (O3) and particulate matter (PM) pollution. The County spans two distinct air basins with differing meteorological, geographic, and development characteristics:

South Coast Air Basin (SCAB)

The South Coast Air Basin includes the majority of metropolitan Los Angeles County, including the Westside, Metro, Gateway, South Bay, West San Gabriel Valley, East San Gabriel Valley, San Fernando Valley, Santa Monica Mountains, and Santa Clarita Valley Planning Areas. This basin is managed by the South Coast Air Quality Management District (SCAQMD) and is one of the most

polluted air basins in the United States. The basin is classified as a nonattainment area for the following pollutants:

- Ozone (O3) – Extreme nonattainment (federal 2015 standard)/nonattainment (state)
- PM2.5 (fine particulate matter) – Moderate nonattainment (federal 2012 standard)/nonattainment (state)
- PM10 (coarse particulate matter) – Nonattainment (state only)

The SCAB is characterized by low wind speeds, temperature inversions, and surrounding mountain ranges, which trap air pollutants and limit dispersion. These conditions are particularly problematic during warm, sunny months, when photochemical reactions intensify ozone formation. In unincorporated Los Angeles County, air pollutant sources include:

- On-road vehicle traffic along major arterials and freeways;
- Construction equipment and dust;
- Industrial and oil production sources, particularly in Baldwin Hills, Pico Canyon, and the Santa Clarita Valley; and
- Area sources, such as landscaping equipment, fuel combustion, and residential wood burning.

Oil production activities contribute to baseline emissions of volatile organic compounds (VOCs), nitrogen oxides (NOX), particulate matter (PM10 and PM2.5), and toxic air contaminants (TACs) such as benzene, formaldehyde, and diesel particulate matter. These emissions arise from:

- Internal combustion engines and flares;
- Fugitive emissions from tanks, wellheads, and pipelines;
- On-site vehicle trips and truck loading; and
- Occasional venting or maintenance operations.

Mojave Desert Air Basin (MDAB)

The Antelope Valley Planning Area lies within the Mojave Desert Air Basin (MDAB) and is regulated by the Antelope Valley Air Quality Management District (AVAQMD). While less densely populated, this region is still classified as nonattainment for:

- Ozone (O3) – Severe nonattainment (federal 2015 standard)/nonattainment (state)
- PM10 (coarse particulate matter) – Nonattainment (state only)

The MDAB is characterized by:

- High solar radiation, which drives ozone formation;
- Strong winds, which cause windblown dust and particulate matter;
- Sparse vegetation and expansive open areas, which make dust control challenging; and
- A lower density of industrial sources, but potential impacts from some agricultural operations and wind-blown emissions from unpaved roads and disturbed sites.

Sensitive Receptors and Sensitive Uses

For the purposes of this EIR, sensitive receptors are evaluated in strict alignment with the definition of a 'Sensitive use' established in Los Angeles County Code Section 22.14.190. A sensitive use is

defined as a land use where individuals are most likely to reside or spend time, provided they are permitted in the zones where they are located. Within the unincorporated areas, these include:

- Dwelling units;
- Schools and school yards (including trade schools, public and private schools, and faith-based and secular schools);
- Parks and playgrounds;
- Daycare centers and preschools (including those accessory to a place of worship);
- Nursing homes and licensed care facilities;
- Shelters; and
- Hospitals.

Pursuant to Title 22, a sensitive use specifically excludes a caretaker residence or a legal, nonconforming residence located in an industrial zone. In many cases throughout the unincorporated County, these defined sensitive uses are near active or idle oil production facilities, raising long-standing community health concerns related to toxic air contaminants and odors.

Toxic Air Contaminants and Hot Spots

Several legacy oil fields in Los Angeles County, including the Inglewood Oil Field, have been subject to Air Toxics Hot Spots Program reporting requirements under AB 2588. Health risk assessments prepared under this program have documented potential risks related to:

- Diesel particulate matter (DPM);
- Benzene and other VOCs;
- Formaldehyde; and
- Hydrogen sulfide (H2S) in localized cases.

The phase-out of these sources under the Revised Oil Well Ordinance is expected to reduce long-term exposure to TACs, especially in communities historically burdened by cumulative air quality impacts.

Summary of Existing Air Quality Conditions

Air quality in Los Angeles County remains nonattainment for ozone and fine particulates, with emissions from mobile sources, construction, and industrial operations—including oil production—continuing to pose risks to public health and regulatory compliance. The presence of active oil operations within or near residential neighborhoods and parklands contributes to localized emissions of criteria pollutants, TACs, and odors.

The Revised Oil Well Ordinance is expected to reduce these emissions over time by:

- Phasing out stationary sources of NO_x, VOCs, PM, and TACs;
- Preventing future industrial encroachment into sensitive areas; and
- Reducing cumulative exposure risks in overburdened communities.

The Project does not introduce new stationary emission sources and, instead, represents a transition away from land uses historically associated with degraded air quality in unincorporated Los Angeles County.

5.3.2 CEQA Thresholds of Significance

Consistent with the CEQA Guidelines Appendix G: Environmental Checklist, and the guidance of the South Coast Air Quality Management District (SCAQMD) and the Antelope Valley Air Quality Management District (AVAQMD), the Revised Oil Well Ordinance (the Project) would result in a significant air quality impact if it would:

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.

AQ-2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

5.3.2.1 Air Quality Management District Thresholds

To determine significance under Threshold AQ-2, the Project's emissions are evaluated using SCAQMD and AVAQMD recommended daily thresholds for construction and operational activities, even though the Revised Oil Well Ordinance is not a traditional development project. The emissions thresholds used for screening are:

Pollutant	***SCAQMD Daily Threshold (lbs/day)***	***AVAQMD Daily Threshold (lbs/day)***
Reactive Organic Gases (ROG/VOC)	55	137
Nitrogen Oxides (NOX)	55	137
Carbon Monoxide (CO)	550	548
Sulfur Oxides (SOX)	150	137
Particulate Matter (PM10)	150	82
Particulate Matter (PM2.5)	55	65

For Threshold AQ-3, significance is assessed based on exposure of sensitive receptors to localized concentrations of pollutants, including:

- Carbon monoxide (CO) "hot spots" near congested intersections;
- Toxic air contaminants (TACs), such as diesel particulate matter (DPM), benzene, and formaldehyde; and
- Particulate matter (PM2.5, PM10) near emission sources.

For Threshold AQ-4, emissions that result in objectionable odors or nuisance-level effects may be significant if they impact residential neighborhoods, schools, hospitals, or other sensitive land uses.

Although the Revised Oil Well Ordinance is a regulatory project, rather than a site-specific development, this document applies these thresholds qualitatively and conservatively to assess whether temporary emissions from decommissioning activities—or long-term policy effects—could result in significant air quality impacts.

5.3.3 Environmental Impacts

5.3.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the long-term operational phase-out of fossil fuel facilities would be cumulatively beneficial for regional air quality.

The CAP PEIR also determined that, at a programmatic, countywide scale, the physical implementation of decarbonization measures—specifically the concurrent use of heavy off-road diesel equipment—could generate short-term criteria pollutant emissions that exceed regional thresholds, requiring programmatic mitigation. However, the specific activities mandated by this Project (the Revised Oil Well Ordinance) are governed by strict Project Design Features (PDFs) and mandate compliance with existing, stringent state and regional regulations (such as SCAQMD rules and CARB fleet requirements). Because these existing regulations and PDFs ensure that the incremental, short-term impacts of the Project's dispersed decommissioning activities remain less than significant, the programmatic mitigation measures identified in the CAP PEIR are not required for this Project. Therefore, this analysis focuses on demonstrating how the Project's short-term decommissioning activities comply with these existing frameworks to avoid significant impacts.

The analysis of air quality impacts in this section is based on guidance from the South Coast Air Quality Management District (SCAQMD) and the Antelope Valley Air Quality Management District (AVAQMD), in conjunction with the CEQA Guidelines Appendix G. Although the Revised Oil Well Ordinance is a regulatory land use policy, and not a construction or development project, this policy-level analysis considers whether the Project could result in emissions or operational changes that would:

- Exceed applicable thresholds for criteria air pollutants;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Conflict with regional air quality management plans.

Project Scope and Analytical Approach

The Revised Oil Well Ordinance:

- Prohibits new oil well development in unincorporated Los Angeles County;
- Phases out existing oil operations over a 20-year amortization period;
- Requires decommissioning and restoration of oil production sites.

Because decommissioning is localized, temporary, and will span a 20-year period, emissions from any single event are expected to be well below daily thresholds, particularly for NOX, PM10, and ROG.

The analysis did not include quantitative modeling (e.g., CalEEMod or OFFROAD) because:

- The Project does not propose site-specific development;
- Emissions-generating activities would occur gradually and intermittently; and
- Long-term Project effects represent a net reduction in emissions.

Vehicle Miles Traveled (VMT) Consideration

The Project is not expected to induce growth or increase travel demand. It phases out operations that currently generate truck trips, service vehicle activity, and employee commutes. As such, a VMT analysis was not prepared, and vehicle-related emissions were not modeled.

This qualitative conclusion is supported by the Project's purpose and design, which is to:

- Phase out a source of both mobile and stationary emissions;
- Reduce land use conflicts in proximity to sensitive receptors; and
- Align with regional and state air quality and climate policy.

Sensitive Receptor Evaluation

The analysis considers whether decommissioning activities could temporarily expose sensitive receptors—including residents, schools, parks, and healthcare facilities—to elevated levels of:

- Particulate matter (dust and combustion emissions);
- Diesel exhaust from equipment; or
- Odors and VOCs from decommissioning activities.

Given the short-term and localized nature of decommissioning, and the lack of large-scale concurrent activity, the Project is not expected to expose sensitive receptors to substantial pollutant concentrations.

5.3.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a County-initiated land use regulation that applies to all unincorporated areas of Los Angeles County except the Coastal Zone. The Project amends the Los Angeles County Code (Titles 12 and 22), the County General Plan, and the Newhall Ranch

Specific Plan to prohibit the development of new oil wells and production facilities, and to phase out existing oil wells by designating them as nonconforming uses, subject to a 20-year amortization period. Once the amortization period ends, oil operations would be required to cease, and each facility would be decommissioned and restored in accordance with County and State requirements. The 20-year amortization period of the Revised Oil Well Ordinance is determined by existing provisions of Title 22. This schedule is independent of CEQA timing assumptions and reflects land use policy decisions about nonconforming use phase-out.

Although the Project does not authorize construction or land development, it will result in changes to ongoing and future emissions associated with oil production in unincorporated areas. These changes are relevant to air quality analysis under CEQA and fall into two primary categories: short-term emissions from facility decommissioning, and long-term reductions in stationary and mobile source emissions.

During the amortization and decommissioning period, affected sites may continue oil production activities, subject to existing regulations. As facilities are phased out, each will undergo closure procedures, including equipment dismantling, well plugging, material transport, and surface restoration. These activities are anticipated to generate temporary, construction-equivalent emissions, primarily from diesel-powered equipment and vehicle trips related to hauling and site access. However, decommissioning will occur incrementally over many years and at dispersed locations, limiting the potential for cumulative or concentrated air quality impacts.

Following decommissioning, emissions associated with oil production will be permanently eliminated. This includes both:

- Stationary source emissions, such as those from internal combustion engines, vapor recovery systems, flares, and fugitive releases from tanks and pipelines; and
- Indirect mobile emissions, including vehicle trips by employees, vendors, and oil haulers.

By eliminating future oil production activities and prohibiting the development of new wells, the project will result in a long-term reduction in emissions of criteria air pollutants, volatile organic compounds (VOCs), and toxic air contaminants (TACs), including benzene, formaldehyde, diesel particulate matter, and other petroleum-associated pollutants. These benefits are most pronounced in areas such as Baldwin Hills and the Gateway and Metro Planning Areas, where oil facilities are currently located near residential neighborhoods or other sensitive land uses.

The Project is also expected to reduce exposure to short-term odor nuisances, flaring events, and potential emission spikes caused by maintenance operations or equipment failures. No new emission sources would be introduced by the Project.

In summary, the Revised Oil Well Ordinance establishes a regulatory framework that eliminates long-term emissions from oil operations in unincorporated Los Angeles County. While limited, localized emissions may occur during the decommissioning of individual sites, these are expected to be temporary, minor, and widely dispersed. The Project's overall effect is an anticipated improvement in local and regional air quality over time.

5.3.3.3 Impact Analysis

This section evaluates whether implementation of the Revised Oil Well Ordinance would result in significant impacts to air quality within unincorporated areas of Los Angeles County, based on the thresholds of significance established in *Section 5.3.2* and using the methodology described in *Section 5.3.3.1*. The analysis considers both short-term emissions associated with decommissioning and site restoration activities, and long-term changes in emissions resulting from the phase-out of oil production facilities.

Although the Project does not authorize new construction, land development, or infrastructure expansion, it would result in temporary emissions from activities such as well plugging, equipment dismantling, and limited grading. These emissions are expected to be localized, dispersed, and time-limited. Over the long term, the Project will eliminate emissions associated with active oil production facilities, contributing to regional air quality improvements.

This impact analysis is qualitative in nature and focuses on whether the Project could:

- Conflict with or obstruct implementation of applicable air quality plans;
- Generate emissions that exceed SCAQMD or AVAQMD thresholds for criteria pollutants;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in objectionable odors affecting nearby land uses.

Each subsection below evaluates the Revised Oil Well Ordinance against one of the four CEQA significance thresholds for air quality, based on existing air quality conditions, applicable regulatory context, and available emission estimates. Where appropriate, the analysis also considers potential cumulative effects and the Project's consistency with regional and state air quality policy.

Impact 5.3-1: Would the proposed Project conflict with or obstruct implementation of the applicable air quality plan? [Threshold AQ-1]

Less than Significant Impact.

The applicable air quality plans for unincorporated Los Angeles County include:

- The 2022 Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD) for the South Coast Air Basin (SCAB); and
- The Federal 8-Hour Ozone Attainment Plan and related documents prepared by the Antelope Valley Air Quality Management District (AVAQMD) for the Mojave Desert Air Basin (MDAB).

These plans establish emissions reduction strategies to attain and maintain state and federal ambient air quality standards, especially for pollutants for which the region is in nonattainment, such as ozone (O3) and fine particulate matter (PM2.5). They include control measures for stationary sources, mobile sources, and area sources, and require consistency with growth forecasts developed by the Southern California Association of Governments (SCAG).

The Revised Oil Well Ordinance is a regulatory land use action that prohibits the establishment of new oil wells and associated production facilities in unincorporated areas of Los Angeles County and requires the phase-out of existing oil operations over a 20-year amortization period. The Project does not introduce any new land uses, does not generate new permanent sources of emissions, and is not expected to result in population growth or increased vehicle travel. Therefore, the Project would not conflict with the demographic or emissions assumptions underlying regional air quality management plans.

To the contrary, the Revised Oil Well Ordinance directly supports the objectives of both the SCAQMD and AVAQMD air quality plans by:

- Reducing future emissions from stationary sources, including oil field engines, flares, and fugitive equipment;
- Eliminating mobile emissions associated with oil production vehicle trips;
- Preventing future fossil fuel infrastructure that would otherwise require long-term regulatory oversight and emissions controls; and
- Supporting attainment efforts by decreasing localized and regional emissions of reactive organic gases (ROG/VOCs), nitrogen oxides (NOX), and particulate matter.

The Project is also consistent with CARB's 2022 State Strategy for the State Implementation Plan (SIP), which relies on local and regional actions to reduce ozone precursors and PM2.5 in nonattainment areas like the South Coast Air Basin. Because the Revised Oil Well Ordinance reduces emissions from legacy industrial sources in communities disproportionately burdened by poor air quality, especially in the Gateway and Metro Planning Areas, it also supports the implementation of AB 617 (Community Air Protection Program) goals in Los Angeles County.

In summary, the Project would not conflict with or obstruct the implementation of the applicable air quality plans. Instead, it would support regional and state objectives to reduce pollutant concentrations, protect sensitive receptors, and improve public health. Therefore, the impact would be less than significant.

Impact 5.3-2: Would the proposed Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? [Threshold AQ-2]

Less than Significant Impact.

Los Angeles County lies within two air basins that are designated as nonattainment areas for several criteria pollutants under federal and state ambient air quality standards:

- The South Coast Air Basin (SCAB) is in extreme nonattainment for ozone (O_3) and serious nonattainment for PM2.5 and is also designated nonattainment for PM10 and nitrogen dioxide (NO_2) under California standards.
- The Mojave Desert Air Basin (MDAB), including the Antelope Valley, is also nonattainment for ozone and PM10 under state standards.

The CEQA significance threshold for this criterion evaluates whether a project would result in a net increase in emissions of criteria pollutants, such that it would contribute cumulatively to these nonattainment conditions. For projects located in the South Coast and Mojave Desert air basins, SCAQMD and AVAQMD have established daily mass emission thresholds to determine whether a project's emissions would be cumulatively considerable.

The Revised Oil Well Ordinance is a regulatory action that prohibits the development of new oil wells and requires the phase-out and decommissioning of existing oil production facilities in unincorporated Los Angeles County. The Project would not generate new permanent emissions, does not authorize new land development, and would not increase vehicle trips, energy use, or construction activity beyond the scope of decommissioning activities.

Short-term emissions would occur during site closure and restoration, such as:

- Well plugging;
- Equipment dismantling and removal;
- Soil stabilization and grading; and
- Temporary vehicle and equipment use.

These activities are expected to be:

- Short in duration;
- Spread across many sites over a 20-year period; and
- Limited in intensity, involving small crews and low daily emissions.

These decommissioning activities will require the use of heavy-duty diesel equipment (e.g., well-abandonment rigs, excavators, loaders) and haul trucks. As identified in the CAP PEIR (Impact 3.2-1), the simultaneous operation of heavy off-road construction equipment across multiple sites has the potential to generate short-term emissions of NOX and particulate matter (PM10 and PM2.5) that could exceed the SCAQMD and AVAQMD daily mass emission thresholds. While ROWO's decommissioning activities will be geographically dispersed and staggered over a 20-year amortization period, preventing massive concurrent equipment use, the potential exists for localized decommissioning activities to temporarily exceed these thresholds.

To address this, any ground-disturbing decommissioning activities will be subject to mandatory compliance with existing state and regional air quality regulations, including California Air Resources Board (CARB) off-road diesel fleet requirements and applicable air district rules (such as SCAQMD Rule 403 and AVAQMD Rule 403 for fugitive dust control). These existing regulatory frameworks legally mandate that operators utilize cleaner off-road diesel engines (such as EPA Tier 3 or Tier 4), limit equipment idling to five minutes, and implement rigorous fugitive dust controls during all well abandonment and site restoration activities. Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the incremental short-term emissions from individual decommissioning sites are expected to remain well below the SCAQMD and AVAQMD daily thresholds.

The elimination of emissions from oil field equipment, flares, internal combustion engines, and heavy-duty vehicle trips would reduce the County's overall contribution to regional nonattainment conditions. In this way, the Project contributes positively to regional air quality trends.

Because the Revised Oil Well Ordinance would generate no new ongoing emissions, produce only short-term, minor emissions from decommissioning activities, and lead to a long-term net decrease in criteria pollutant emissions, it would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Therefore, the impact would be considered less than significant.

Impact 5.3-3: Would the proposed Project expose sensitive receptors to substantial pollutant concentrations? [Threshold AQ-3]

Less than Significant Impact.

CEQA requires analysis of whether a project would expose sensitive receptors to substantial concentrations of air pollutants. As established in Section 5.3.1.2, this analysis relies on the County's definition of 'sensitive use' (Title 22, Section 22.14.190), which includes dwelling units, schools, parks, hospitals, and licensed care facilities, among others. This includes:

- Localized concentrations of criteria pollutants, such as carbon monoxide (CO), nitrogen dioxide (NO2), or fine particulate matter (PM2.5);
- Toxic air contaminants (TACs), such as diesel particulate matter (DPM), benzene, and formaldehyde; and
- Pollutants associated with fugitive emissions or short-term construction-type activities.

Under this threshold, localized pollutant exposures are typically of concern when:

- A project generates high volumes of on-site emissions near sensitive receptors;
- Equipment or vehicle engines emit pollutants that accumulate in nearby occupied areas; or
- Operations involve sources of air toxics subject to health risk assessment under AB 2588 (Air Toxics "Hot Spots").

The Revised Oil Well Ordinance is a regulatory action that prohibits new oil wells and phases out existing oil production operations. It does not authorize new stationary emission sources, new land uses, or long-term operations that would expose nearby receptors to pollutant concentrations. Instead, it results in the removal of existing sources, many of which are currently located near sensitive receptors.

During the decommissioning phase, temporary emissions would occur from:

- Diesel-powered construction equipment (e.g., rigs used for plugging, heavy equipment, haul trucks);
- Soil disturbance and vehicle travel on unpaved access roads (contributing to PM10 and PM2.5); and
- Limited on-site idling or material handling.

However, these activities are expected to be:

- Short, typically lasting several days to a few weeks per site;
- Distributed across the County, reducing localized exposure concentrations; and
- Subject to standard best management practices, such as equipment maintenance and light and dust control.

Permitted sensitive uses (such as dwelling units, schools, and parks) may be located near legacy oil operations, particularly in:

- Baldwin Hills and View Park-Windsor Hills (adjacent to the Inglewood Oil Field);
- Portions of the Santa Clarita Valley; and
- The Gateway and Metro Planning Areas.

In these areas, decommissioning activities would replace ongoing oil production emissions, such as those from combustion engines, vapor recovery units, or flares, with temporary emissions. The overall effect would be a net reduction in exposure risk, especially to air toxics and diesel particulate matter. The Revised Oil Well Ordinance also supports long-term public health protection by eliminating sources that would otherwise be subject to SCAQMD Rule 1401's health risk thresholds and the AB 2588 Air Toxics "Hot Spots" program. As such, it reduces the need for future risk assessments and mitigations at these sites. Furthermore, because no large-scale concurrent construction is expected, and the amortization period extends over 20 years, the cumulative exposure risk to any one receptor is minimal. The Revised Oil Well Ordinance also supports the goals of AB 617, which prioritizes emission reductions in disadvantaged communities historically impacted by cumulative pollutant burdens.

In summary:

- The Project does not authorize new emissions sources near sensitive receptors;
- Temporary decommissioning emissions would be short-term, minor, and spatially dispersed; and
- Long-term emissions associated with oil production—including TACs—would be reduced and eventually eliminated.

For these reasons, implementation of the Revised Oil Well Ordinance would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be considered less than significant.

Impact 5.3-4: Would the proposed Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? [Threshold AQ-4]

Less than Significant Impact.

CEQA requires consideration of whether a project would result in emissions that cause odor impacts or other nuisance-level air quality effects that adversely affect nearby residents or other sensitive receptors. Although odors are typically considered a subjective nuisance, they can contribute to community complaints, stress, and degraded quality of life—especially when emissions originate from industrial operations near populated areas.

Common sources of odors in Los Angeles County include:

Oil production and processing equipment;
Storage tanks and sumps;
Flaring, venting, and separator operations;
On-site fuel combustion; and
Asphalt, landfill, or wastewater facilities.

The Revised Oil Well Ordinance is a land use regulation that will prohibit the development of new oil wells and require the decommissioning of existing oil production facilities in unincorporated areas of the County. As such, the project will:

Eliminate odor-producing land uses by phasing out oil production equipment producing VOC emissions, gas leaks, and petroleum-related vapors;
Prevent the introduction of new sources of objectionable odors, such as those associated with new fossil fuel infrastructure; and
Reduce complaints and community exposure to odorous and noxious emissions near legacy oil fields.

In areas such as Baldwin Hills and parts of the Santa Clarita Valley, there is well document history of reports of odors associated with nearby oil production facilities, particularly during flaring events, maintenance operations, or equipment failures and fugitive leaks. These complaints have been documented in prior CEQA documents, including the 2008 Baldwin Hills CSD Final EIR. The Revised Oil Well Ordinance would eliminate these long-standing odor sources over time.

During the decommissioning phase, there may be limited and short-term emissions of diesel exhaust or petroleum odors from well plugging, equipment removal, or materials handling. However, these emissions:

- Are temporary and expected to last only a few days to weeks per site;
- Will be subject to SCAQMD Rule 402, which prohibits emissions that create nuisance conditions affecting a substantial number of people; and
- Will be managed through standard best practices, such as maintaining equipment, capping emissions sources during dismantling, and avoiding unnecessary idling.

SCAQMD Rule 402 is a complaint-based regulation, and its enforcement is triggered when repeated or confirmed odor complaints indicate that emissions are adversely affecting a substantial number of people. As the Project phases out odor-generating operations, future complaints are expected to decline.

No permanent or large-scale odor-producing activity will be introduced. Furthermore, as the amortization period progresses and oil operations cease, odor impacts will decline and ultimately be eliminated altogether.

In summary:

- The Project does not introduce new sources of odors;
- Temporary emissions during decommissioning are short-lived;
- Long-term odor sources will be removed from unincorporated areas; and
- Odor regulations and enforcement mechanisms remain in place during the transition.

Therefore, the Project would not result in emissions (such as odors) that would adversely affect a substantial number of people, and the impact would be less than significant.

5.3.4 Cumulative Impacts

This section evaluates whether the Revised Oil Well Ordinance (the Project), when considered in combination with other past, present, or reasonably foreseeable future projects, would result in a cumulatively considerable impact on air quality, as required under CEQA Guidelines Section 15130.

Cumulative air quality impacts are inherently regional. The Project Area is located within air basins that are in nonattainment for multiple state and federal ambient air quality standards. Consequently, the existing cumulative condition is significant. The central question for this analysis is not whether cumulative impacts exist, but whether the Project's incremental contribution to those impacts is "cumulatively considerable." This analysis is conducted with special consideration for regional and statewide efforts to phase-out local oil production, increasing reliance on imported oils. Demand for oil and gas will persist in California even as the state transitions to renewable fuel sources.

This analysis addresses:

- The regional cumulative conditions for criteria pollutants in the South Coast and Mojave Desert air basins.
- The Project's net incremental contribution to those regional conditions, considering both the direct elimination of emissions from oil and gas operations and the indirect, secondary emissions from activities induced by the Project, namely increased marine tanker traffic.

Cumulative Conditions in Los Angeles County

Los Angeles County spans two major air basins with well-documented air quality challenges that define the cumulative context for this analysis:

- The South Coast Air Basin (SCAB) is designated as:
    - Extreme nonattainment for ozone (O3) (federal 2015 standard/state);
    - Moderate nonattainment for fine particulate matter (PM2.5) (federal 2012 standard/state); and
    - Nonattainment for PM10 under state standards.
- The Mojave Desert Air Basin (MDAB), which includes the Antelope Valley Planning Area, is designated as:
    - Severe nonattainment for ozone (federal 2015 standard/state); and
    - Nonattainment for PM10 (state only).

Major sources contributing to cumulative air pollution in these regions include mobile sources (automobiles, heavy-duty trucks), area sources (construction, residential combustion), and stationary sources (power plants, refineries, and existing oil production facilities). Both air basins

are subject to comprehensive Air Quality Management Plans (AQMPs) and State Implementation Plans (SIPs), developed and enforced by the South Coast Air Quality Management District (SCAQMD), the Antelope Valley Air Quality Management District (AVAQMD), and the California Air Resources Board (CARB). These plans mandate aggressive, ongoing strategies to reduce emissions of ozone precursors (NOX and ROG) and particulate matter to bring the basins into attainment.

Because both basins are in nonattainment, the existing cumulative air quality condition is significant, and any project that contributes a net increase in emissions of nonattainment pollutants could be considered to have a cumulatively considerable impact.

Project Contribution to Cumulative Impacts

The Project's primary effect is the eventual cessation of all oil and gas extraction activities in the unincorporated areas of Los Angeles County. This action has both a direct, beneficial effect on local and regional air quality and a foreseeable indirect, secondary effect related to the replacement of the discontinued oil supply.

Direct Project Effects (Beneficial Contribution)

The Project would result in the permanent elimination of all operational and fugitive emissions associated with existing and future oil wells in the unincorporated County. These emissions sources include:

- Stationary Combustion: Emissions from engines, heaters, and other equipment used for drilling, pumping, and processing.
- Mobile Sources: Emissions from heavy-duty workover rigs, maintenance vehicles, and worker commute trips traveling to and from well sites.
- Fugitive Emissions: Uncontrolled release of reactive organic gases (ROG), a precursor to ozone, from wellheads, tanks, valves, and other components.
- Particulate Matter: Emissions of PM10 and PM2.5 from diesel engines and fugitive dust from vehicle travel on unpaved roads at well sites.

By eliminating these sources, the Project directly supports the goals of the regional AQMPs, which identify the reduction of emissions from stationary and mobile sources as critical to achieving attainment. This permanent emissions reduction represents a beneficial contribution to the cumulative air quality condition.

Indirect Project Effects (Potentially Adverse Contribution)

The analysis of indirect effects must account for the total volume of displaced oil production within the cumulative context. According to 2024 production data obtained from the California Department of Conservation Geologic Energy Management Division (CalGEM) Well Statewide Tracking and Reporting System (WellSTAR), wells throughout Los Angeles County (including both unincorporated areas and incorporated cities) produced approximately 11.9 million barrels of

crude oil, accounting for roughly 11% of California's total production. This countywide figure is used as the basis for this cumulative analysis because it is reasonably foreseeable that other jurisdictions, such as the City of Los Angeles, will also implement similar phase-out policies as part of a regional trend. Therefore, the total displaced production from the entire county provides the most accurate forecast for replacement via marine import.

To estimate the indirect emissions associated with replacing this regional production, this analysis relies on a highly conservative methodology. It assumes a static 1:1 replacement ratio, functioning as if every displaced barrel of local crude must be replaced by a marine imported barrel. This methodology inherently contains several limitations and assumptions: it does not account for structural demand destruction mandated by California's climate policies (such as the Advanced Clean Cars II rule transitioning the state to zero-emission vehicles), nor does it account for the gradual, incremental nature of the 20-year amortization period. By intentionally overestimating the total volume of displaced oil, utilizing an immediate annualized rate, and ignoring future fossil fuel demand reductions, this methodology provides a reasonable worst-case scenario. This ensures that the indirect environmental impacts of the Project are not understated for CEQA purposes.

Under this conservative framework, replacing the countywide volume via marine tankers at the San Pedro Bay Ports (Ports of Los Angeles and Long Beach) or the El Segundo offshore terminal would require additional trips based on typical vessel capacities:

- Low estimate (using larger Suezmax tankers): 11,944,163 barrels / 1,000,000 barrels per tanker ≈ 12 trips
- High estimate (using smaller Aframax tankers): 11,944,163 barrels / 500,000 barrels per tanker ≈ 24 trips

This results in a conservative estimate of 12 to 24 additional tanker trips annually.

These additional tanker trips would generate criteria pollutant emissions within the SCAB, primarily from the combustion of heavy fuel oil in main and auxiliary engines. Pollutants of concern include:

- Nitrogen Oxides (NOX);
- Sulfur Oxides (SOX);
- Diesel Particulate Matter (DPM), a component of PM2.5; and
- Reactive Organic Gases (ROG).

These emissions would occur along shipping lanes approaching the ports and would be concentrated at the marine oil terminals during berthing, where ships run auxiliary engines. This would introduce new emissions in communities adjacent to the ports, which are already disproportionately affected by air pollution. Considered in isolation, this increase in ship-related emissions represents an adverse contribution to the significant cumulative air quality impact in the SCAB.

Analysis of Net Cumulative Contribution

To determine if the Project's overall effect is cumulatively considerable, the beneficial impact of eliminating oil field emissions must be weighed against the adverse impact of increased tanker

emissions. This evaluation must also consider the extensive regulatory framework governing emissions from marine vessels.

Regulatory Context for Marine Emissions

Incremental emissions from tankers are subject to increasingly stringent regulations designed to minimize their impact. These include:

- CARB At-Berth Regulation: This rule requires vessels to shut down their auxiliary engines and connect to shore-based electricity ("shore power") or use an approved emissions capture and control system while docked. This dramatically reduces emissions of DPM, NOX, and SOX at the berth. This regulation is being phased in for tanker vessels at the San Pedro Bay Ports starting in 2025.
- Vessel Speed Reduction Programs: The ports incentivize vessels to slow down within 40 nautical miles of shore, which significantly reduces fuel consumption and associated emissions of NOX and other pollutants.
- Low-Sulfur Fuel Requirements: State and international regulations mandate the use of low-sulfur marine gas oil within 24 nautical miles of the California coast, which drastically cuts SOX and DPM emissions compared to standard heavy fuel oil.

Relative Increase in Marine Traffic

The San Pedro Bay port complex is one of the busiest in the world, handling approximately 4,000 total vessel arrivals annually. The projected increase of 12 to 24 additional tanker trips per year represents an increase of approximately 0.3% to 0.6% of the total vessel traffic. This incremental increase is negligible when compared to existing port operations and would not tangibly affect port capacity, scheduling, or overall marine vessel congestion in the region.

Comparison of Emission Profiles

The Project replaces numerous dispersed terrestrial emission sources (oil wells) with a smaller number of mobile marine sources that are subject to a robust and continually tightening regulatory regime. While the tanker emissions are concentrated, the existing regulations are specifically designed to mitigate their most significant impacts, particularly at the port-community interface.

Consistency with Regional Air Quality Plans

The fundamental purpose of the regional AQMPs is to transition away from polluting activities to meet air quality standards. The Project's primary action—the phasing out of a fossil fuel extraction industry—is directly consistent with the long-term emission reduction goals of the AQMPs for the SCAB and MDAB. While the Project results in a secondary shift in emission sources, the primary action aligns with regional clean air policy.

Conclusion on Cumulative Air Quality Impacts

When viewed in its entirety, the Project's incremental contribution to cumulative air quality impacts would not be cumulatively considerable. This conclusion is based on the following findings:

- The Project achieves a permanent reduction in criteria pollutant emissions by eliminating all sources associated with oil and gas extraction under its jurisdiction.
- This direct emissions reduction is a beneficial impact that helps to alleviate the existing significant cumulative air quality problem and is consistent with the goals of the applicable AQMPs.
- Even when utilizing a methodology designed to intentionally overestimate indirect impacts, the maximum potential increase of 12 to 24 additional tanker trips per year would be subject to a comprehensive and stringent regulatory framework (including at-berth controls, speed reduction, and low-sulfur fuel mandates) that minimizes their contribution to regional air pollution. Furthermore, because the replacement calculation relies on static 2024 demand levels, it represents an absolute ceiling; as statewide fossil fuel reliance predictably declines in the coming decades, the actual number of required tanker trips may be significantly lower.
- The net effect of the Project, considering the balance between the permanent, direct elimination of local oil field emissions and the highly regulated—and conservatively overestimated—nature of induced marine emissions, represents a long-term improvement for regional air quality.

Therefore, the Project's contribution is not considerable in the context of CEQA, and the cumulative impact on air quality is less than significant.

5.3.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to air quality resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project does not authorize new development or infrastructure expansion that would introduce new emissions sources. Instead, its primary long-term effect is a beneficial reduction in stationary and mobile source emissions, contributing to regional air quality improvements and supporting attainment goals for criteria pollutants.

Any temporary, short-term emissions associated with the decommissioning of existing oil production facilities are expected to be localized and minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and regional regulations (including SCAQMD and AVAQMD rules and state off-road diesel fleet requirements), as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.3.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to air quality. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks. Because the Project does not result in significant impacts to air quality, no CEQA mitigation measures are necessary.

5.3.7 Level of Significance After Mitigation

The Project's impacts related to air quality were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.3.8 References

California Air Resources Board (CARB)

Ambient Air Quality Standards. Accessed 2025. https://ww2.arb.ca.gov/resources.

AB 617: Community Air Protection Program. Accessed 2025.

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State Implementation Plan (SIP). Accessed 2025.

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CHAPTER 5.4 BIOLOGICAL RESOURCES

This section evaluates the potential for the Revised Oil Well Ordinance (the Project) to result in significant impacts to biological resources in unincorporated areas of Los Angeles County, consistent with the California Environmental Quality Act (CEQA) and applicable federal, state, and local biological resource regulations. The analysis considers whether implementation of the Project could result in direct or indirect disturbance of:

- Candidate, sensitive, or special-status species, including those listed under the federal or California Endangered Species Acts;
- Sensitive natural communities, such as riparian corridors, coastal sage scrub, chaparral, and native grasslands;
- Jurisdictional wetlands, including those regulated by the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife;
- Non-jurisdictional wetlands and ephemeral drainages that support unique biological functions;
- Wildlife movement corridors and linkages that connect habitat patches or support regional species migration; or
- Protected native trees and unique native woodlands, including oak woodlands, Joshua tree groves, and sycamore stands.

This section includes a description of the biological and regulatory setting, the criteria and thresholds used to evaluate biological impacts under CEQA, a discussion of the methodology used to assess potential impacts from the Revised Oil Well Ordinance, and the resulting impact conclusions. The analysis is supported by geographic information systems (GIS) data, aerial imagery, and regional biological databases. Key sources consulted include:

- The California Natural Diversity Database (CNDDB) maintained by the California Department of Fish and Wildlife (CDFW);
- The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants;
- The U.S. Fish and Wildlife Service (USFWS) species occurrence records and critical habitat maps;
- County-level datasets, including Significant Ecological Areas (SEAs) and Oak Tree habitat; and
- Applicable federal and state wildlife agency guidance.

During the scoping period, commenters including the City of Culver City, the California Independent Petroleum Association, and The Termo Company raised concerns about potential impacts to biological resources (see *Chapter 2*, Table 2-1: Summary of Scoping Comments Received). Commenters noted that ground-disturbing activities related to well plugging and site restoration could affect sensitive plant and animal habitats. They also pointed out that many of the oil fields currently function as large open spaces that provide valuable habitat for wildlife. This

section takes these comments into account and evaluates the Project's potential effects on biological resources.

5.4.1 Environmental Setting

5.4.1.1 Regulatory Setting

Federal Regulations

Several federal laws, executive orders, and permitting programs protect biological resources, including listed species, wetlands, riparian corridors, and migratory wildlife. Although the Revised Oil Well Ordinance is a local regulatory action and not a federal undertaking, some of its implementation—particularly oil facility decommissioning and site restoration—could involve actions that trigger federal permitting or consultation under these laws. This section summarizes the key federal environmental regulations applicable to biological resources that could be relevant to implementation of the Project.

Endangered Species Act (ESA) of 1973 (16 U.S.C. §1531 et seq.)

The Endangered Species Act (ESA) provides for the conservation of species listed as endangered or threatened and the protection of the ecosystems on which they depend. The ESA is administered by the U.S. Fish and Wildlife Service (USFWS) for terrestrial and freshwater species, and by the National Marine Fisheries Service (NMFS) for most marine species. Key provisions include:

- Section 4 requires designation of critical habitat for listed species, which identifies geographic areas essential to their conservation and recovery.
- Section 7 mandates that federal agencies consult with USFWS or NMFS to ensure that any action they authorize, fund, or carry out does not jeopardize the continued existence of listed species or adversely modify critical habitat.
- Section 9 prohibits the unauthorized “take” of listed wildlife species, where “take” is broadly defined to include harassment, harm, pursuit, injury, or death.
- Section 10 provides for the issuance of incidental take permits to non-federal entities, contingent on the preparation and implementation of a Habitat Conservation Plan (HCP).

Although the Revised Oil Well Ordinance is not a federal action and does not directly authorize physical disturbance, any site-specific decommissioning that affects federally listed species or their critical habitat may require consultation under Section 7 or permitting under Section 10 of the ESA, particularly where federal permits (e.g., Clean Water Act Section 404) are involved.

Clean Water Act (CWA)

The Clean Water Act (CWA) is the primary federal law governing water quality and wetland protection. It includes several sections relevant to biological resources:

- Section 401 (33 U.S.C. §1341): Requires a Water Quality Certification from the applicable Regional Water Quality Control Board (RWQCB) confirming that a federally permitted activity complies with state water quality standards.
- Section 402 (33 U.S.C. §1342): Establishes the National Pollutant Discharge Elimination System (NPDES) program to regulate point source discharges, including stormwater. Some construction-related decommissioning may require coverage under a general NPDES permit if ground disturbance exceeds one acre.
- Section 404 (33 U.S.C. §1344): Administered by the U.S. Army Corps of Engineers (USACE), this section regulates the discharge of dredged or fill material into waters of the United States, including streams, wetlands, and other aquatic features. Permits under Section 404 often require biological assessments, wetland delineations, and mitigation for habitat loss. If listed species are present, consultation under ESA Section 7 may also be triggered.

Implementation of the Revised Oil Well Ordinance may involve decommissioning activities that intersect with wetlands, ephemeral drainages, or riparian areas. If these features fall under USACE jurisdiction, a Section 404 permit (and Section 401 certification) may be required, triggering other federal consultations.

Rivers and Harbors Act of 1899

Section 10 of the Rivers and Harbors Act regulates the placement of structures or materials in navigable waters of the United States, including dredging and bank stabilization. Although navigable waters are rare in most unincorporated areas of Los Angeles County, this law may apply to infrastructure near large perennial water bodies or tidally influenced wetlands. Coordination with USACE may be necessary for oil facilities located near these features.

Wild and Scenic Rivers Act of 1968 (16 U.S.C. §1271 et seq.)

The federal Wild and Scenic Rivers Act protects rivers with outstanding scenic, recreational, geologic, fish and wildlife, historic, or cultural values in a free-flowing condition. Designated rivers are afforded additional review and protection from federally authorized or funded projects. There are no federally designated Wild and Scenic Rivers located within unincorporated Los Angeles County or in the immediate vicinity of areas affected by the Revised Oil Well Ordinance. Therefore, no direct or indirect impacts to designated Wild and Scenic Rivers are anticipated, and the Act is not applicable to this Project.

Migratory Bird Treaty Act (MBTA) of 1918 (16 U.S.C. §§ 703–712)

The MBTA prohibits the take, possession, sale, or destruction of migratory birds and their nests and eggs unless specifically authorized. Administered by USFWS, the MBTA implements international treaties with Canada, Mexico, Japan, and Russia.

In 2021, the U.S. Department of the Interior revised its interpretation of the MBTA to clarify that incidental take (unintentional harm) is not prohibited unless it is the result of affirmative actions

without due care. Nonetheless, CEQA practice generally continues to assess potential impacts on nesting birds during breeding season (typically February through August in Southern California).

If decommissioning work occurs during the nesting season and vegetation removal or disturbance of structures is required, pre-activity surveys and avoidance buffers may be recommended or required pursuant to the MBTA.

Bald and Golden Eagle Protection Act (BGEPA)

The Bald and Golden Eagle Protection Act (16 U.S.C. §668 et seq.) prohibits the take, disturbance, or possession of bald and golden eagles and their nests without a permit. "Disturbance" includes any action that interferes with eagles' normal breeding, feeding, or sheltering behavior. If any Project-related activity occurs within known eagle nesting or foraging areas, coordination with USFWS may be necessary.

Executive Order 11990 – Protection of Wetlands

EO 11990, signed in 1977, directs federal agencies to avoid, to the extent practicable, new construction in wetlands unless no practicable alternative exists. While not directly applicable to non-federal actions, EO 11990 reinforces national policies aimed at avoiding and minimizing impacts to wetland habitats and can influence permit conditions for federally regulated activities (e.g., under the Clean Water Act).

Executive Order 13112 – Invasive Species

EO 13112, signed in 1999, mandates that federal agencies prevent the introduction and spread of invasive species, and encourages habitat restoration efforts to favor native plant communities. While the Revised Oil Well Ordinance is not a federal action, its decommissioning-related restoration activities may include invasive species management consistent with EO 13112's principles and California Department of Food and Agriculture noxious weed guidelines.

U.S. Fish and Wildlife Service Critical Habitat Data Review

As part of this analysis, publicly available USFWS critical habitat mapping tools and the Environmental Conservation Online System (ECOS) database were consulted to identify the presence of designated critical habitat for federally listed species within unincorporated Los Angeles County. While critical habitat may occur in proximity to some oil production sites, the Revised Oil Well Ordinance does not authorize physical development or infrastructure expansion and is not anticipated to result in direct impacts to these areas. However, future decommissioning activities will be required to avoid or minimize impacts in accordance with federal regulations, including potential ESA Section 7 consultation if a federal permit is triggered.

Summary of Federal Biological Considerations

While the Revised Oil Well Ordinance is not a federal action and does not trigger automatic federal agency review, federal environmental laws may still apply to site-specific decommissioning activities that:

- Affect jurisdictional wetlands or waters;
- Require federal permits (e.g., under Section 404 of the CWA);
- Occur in proximity to federally listed species or critical habitat; or
- Involve potential disturbance to nesting birds or eagles.

Where such activities occur, coordination with USFWS, USACE, or other federal agencies may be required. The Project promotes the long-term protection and restoration of biological resources in unincorporated Los Angeles County by removing incompatible oil infrastructure, preventing future industrial intrusion into habitat areas, and supporting vegetation recovery.

State Laws, Regulations, and Policies

A variety of California laws, regulations, and policies govern the protection of biological resources, including special-status species, sensitive natural communities, riparian habitats, wetlands, and wildlife movement corridors. While the Revised Oil Well Ordinance does not authorize land development, construction, or grading, its implementation—including oil facility decommissioning and site restoration—may result in activity near sensitive biological features. The laws summarized below provide the framework for evaluating the potential for direct or indirect biological impacts.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (California Water Code §13000 et seq.) establishes the State's authority to regulate discharges to waters of the State, which include any surface or groundwater—whether or not considered jurisdictional under federal law. Under this Act, any person discharging or proposing to discharge waste into waters of the State must submit a Report of Waste Discharge (ROWD) to the appropriate Regional Water Quality Control Board (RWQCB).

In 2021, the State Water Resources Control Board adopted the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (California Code of Regulations, Title 23, §3855), which define wetlands and set standards for permitting discharges into these features. These procedures apply to all individual waste discharge requirements for dredge or fill activities in non-federally regulated aquatic features (i.e., non-404/401 waters).

Discharges or alterations of any water feature—including ephemeral drainages or isolated wetlands—may require a permit under Porter-Cologne even if no federal nexus exists.

California Endangered Species Act (CESA)

The California Endangered Species Act (CESA) (Fish and Game Code §§2050–2097) protects plant and animal species listed as threatened, endangered, or rare under State law. Like the federal

ESA, CESA prohibits unauthorized "take" of listed species. "Take" is defined as to hunt, pursue, catch, capture, or kill, or attempt to do so.

The California Department of Fish and Wildlife (CDFW) administers CESA and may issue Incidental Take Permits (ITPs) under Section 2081(b) if the take is incidental to an otherwise lawful activity and will not jeopardize the continued existence of the species. Coordination with the U.S. Fish and Wildlife Service (USFWS) is required for activities that affect species listed under both federal and state laws.

Species that are fully protected under Fish and Game Code §§3511, 4700, 5050, and 5515 may not be taken or possessed at any time and cannot be included in Incidental Take Permits. If such species are present within a Project site, activities must be designed to completely avoid take.

California Fish and Game Code Sections 1600–1616 (Streambed Alteration)

Section 1602 of the California Fish and Game Code requires any person or agency proposing to substantially divert, obstruct, or change the bed, bank, or channel of any river, stream, or lake to notify CDFW. This includes ephemeral and intermittent drainages and their associated riparian vegetation, even if no aquatic flow is present year-round.

CDFW may require a Streambed Alteration Agreement (SAA), which outlines avoidance, minimization, and mitigation measures to protect fish and wildlife resources. CDFW jurisdiction typically includes:

- Surface water features that support aquatic or riparian species;
- Drainages with a definable bed and bank;
- Areas supporting hydrophytic or riparian vegetation; and
- Features with hydrologic connections to other aquatic systems.

While the Revised Oil Well Ordinance does not directly authorize in-stream work, decommissioning of oil infrastructure near streams, washes, or riparian areas may trigger SAA requirements.

California Native Plant Protection Act (NPPA)

The Native Plant Protection Act of 1977 (Fish and Game Code §§1900–1913) directs State agencies to conserve rare and endangered native plants. The Act prohibits the unauthorized removal or destruction of listed plants from public lands and requires advance notification to CDFW for projects that may affect sensitive plant populations. This provides CDFW with an opportunity to salvage or relocate rare species prior to ground disturbance.

Decommissioning activities prompted by the Project that disturb native vegetation may be subject to NPPA requirements, particularly in undeveloped or sensitive habitat areas.

California Environmental Quality Act (CEQA)

CEQA is the overarching framework that guides biological resource analysis in environmental documents. Appendix G of the CEQA Guidelines identifies potentially significant biological impacts as those that would:

- Have a substantial adverse effect on special status species;
- Substantially degrade sensitive natural communities, including wetlands and riparian areas;
- Interfere with the movement of native wildlife or impede the use of established wildlife corridors; or
- Conflict with local policies, tree protection ordinances, or habitat conservation plans.

CEQA also requires analysis of indirect and cumulative effects and encourages early coordination with resource agencies.

California Fish and Game Code Sections 3503, 3503.5, and 3513 (Bird Protection)

These provisions prohibit the take, possession, or needless destruction of the nests and eggs of all birds protected under State law, including migratory and non-game species. Section 3503.5 extends protection to birds of prey and their nests. Section 3513 mirrors the protection of the federal Migratory Bird Treaty Act (MBTA) under State law.

Vegetation clearing or equipment staging during the nesting bird season (generally February through August) may require pre-construction surveys and avoidance buffers to prevent violation of these provisions.

California Native Plant Society (CNPS) Rare Plant Rankings

The California Native Plant Society (CNPS) maintains the Inventory of Rare and Endangered Plants of California, which serves as an authoritative source for CEQA practitioners and resource agencies. The CNPS Rare Plant Rankings (CRPRs) identify plant species of conservation concern that may not be formally listed under ESA or CESA.

Under CEQA, plants ranked CRPR 1A, 1B, 2A, and 2B are generally treated as “special-status species”, with potential impacts requiring mitigation. Even non-listed CRPR species may trigger CEQA significance if they are locally rare or occur in sensitive natural communities.

Summary of State Biological Considerations

The Revised Oil Well Ordinance is consistent with California’s comprehensive biological protection framework. Although the Project does not directly authorize construction or grading, future decommissioning and site restoration activities may occur near sensitive habitats, wetlands, streams, or species of concern. As applicable, such actions may be subject to:

- CDFW notification and Streambed Alteration Agreements under Section 1602;
- California Endangered Species Act consultations or incidental take permitting;
- Native Plant Protection Act requirements for rare plant populations; and

- Compliance with any future site-specific CEQA standards for impact avoidance, minimization, and mitigation.

The Project ultimately supports long-term conservation goals by eliminating oil infrastructure and restoring natural areas in unincorporated Los Angeles County.

Local Regulations

The County has adopted a comprehensive framework of land use regulations, biological protection ordinances, and General Plan policies aimed at conserving native habitats, special-status species, and environmentally sensitive areas. While the Revised Oil Well Ordinance does not authorize new development, ground disturbance, or land use changes, its implementation—including decommissioning of oil facilities and long-term land use transitions—must be evaluated considering these policies. The following sections summarize the relevant biological protections established in the Los Angeles County Code and General Plan.

Los Angeles County Code

The Los Angeles County Code includes regulatory, administrative, and environmental provisions relevant to biological resource protection. Key chapters under Title 22: Planning and Zoning are summarized below.

Chapter 22.102 – Significant Ecological Areas (SEAs): SEAs are designated areas with irreplaceable biological resources, including habitat for sensitive species, ecological connectivity, and unique plant communities. The SEA chapter:

- Requires a discretionary SEA Conditional Use Permit for development that cannot demonstrate full compliance with protective provisions;
- Establishes development standards, native tree protections, and open space preservation requirements; and
- Identifies protected tree species and trunk diameter thresholds for protection.

The Revised Oil Well Ordinance supports SEA program goals by prohibiting new oil production infrastructure development and by enabling the removal of industrial activities from sensitive biological areas over time.

Chapter 22.104 – Hillside Management Areas (HMAs): This chapter was established to preserve and enhance the physical integrity, biological resources, and scenic value of Hillside Management Areas (HMAs). These are defined as lands with natural slopes of 25 percent or greater. The HMA Ordinance and accompanying Hillside Design Guidelines (Chapter 22.104, Appendix I) implement General Plan policies by requiring:

- Development to be sited outside HMAs to the extent feasible;
- Development within HMAs to occur on portions with the fewest constraints; and
- Application of sensitive hillside design techniques, with priority given to public safety and biological resource protection over scenic views.

Applicants must complete a Sensitive Hillside Design Measures Checklist and are encouraged to preserve and integrate at least 50 percent of existing onsite trees and woodlands, particularly native species and oak woodlands, into landscape design.

Chapter 22.126 – Tree Planting Requirements: This chapter requires specific tree planting standards for qualifying projects (e.g., new principal use buildings, major additions, and new surface parking lots). The tree planting requirements are intended to:

- Reduce greenhouse gas emissions;
- Capture and treat stormwater onsite; and
- Mitigate the urban heat island effect.

Though not typically triggered by decommissioning, this chapter reflects the County's emphasis on native landscaping and ecological restoration in developed and disturbed areas.

Chapter 22.174 – Oak Tree Permits: This chapter recognizes oak trees as valuable historical, aesthetic, and ecological resources. In unincorporated areas, it prohibits the removal, relocation, or encroachment upon oak trees meeting certain size thresholds without an approved Oak Tree Permit. Protected trees are:

- Single-trunk native oaks ≥8 inches in diameter at 4.5 feet above grade;
- Multi-trunk trees with a combined diameter of ≥12 inches.

The ordinance also protects the tree's dripline plus 5 feet, or a minimum of 15 feet from the trunk—whichever is greater. Limited exemptions apply for emergency work, routine maintenance, and safety. This chapter may be relevant where decommissioning or grading activities occur near protected oak stands.

County of Los Angeles General Plan

The General Plan includes numerous goals and policies that direct the conservation of biological resources, particularly in Significant Ecological Areas (SEAs), riparian corridors, and oak woodlands. The policies below are directly relevant to the implementation and effects of the Revised Oil Well Ordinance:

- Goal LU 3: A development pattern that discourages sprawl, and protects and conserves areas with natural resources and SEAs.
    - Policy LU 3.1: Encourage the protection and conservation of areas with natural resources, and SEAs.
    - Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards.
- Goal C/NR 1: Open space areas that meet the diverse needs of Los Angeles County.
    - Policy C/NR 1.3: Support the acquisition of new available open space areas. Augment this strategy by leveraging County resources in concert with the compatible open space stewardship actions of other agencies, as feasible and appropriate.
- Goal C/NR 2: Effective collaboration in open space resource preservation.
    - Policy C/NR 2.2: Encourage the development of multi-benefit dedicated open spaces.
- Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.

  - Policy C/NR 3.1: Conserve and enhance the ecological function of diverse natural habitats and biological resources.
  - Policy C/NR 3.2: Create and administer innovative County programs incentivizing the permanent dedication of SEAs and other important biological resources as open space areas.
  - Policy C/NR 3.3: Restore upland communities and significant riparian resources, such as degraded streams, rivers, and wetlands to maintain ecological function—acknowledging the importance of incrementally restoring ecosystem values when complete restoration is not feasible.
  - Policy C/NR 3.4: Conserve and sustainably manage forests and woodlands.
  - Policy C/NR 3.5: Ensure compatibility of development in the National Forests in conjunction with the U.S. Forest Service Land and Resource Management Plan.
  - Policy C/NR 3.6: Assist state and federal agencies and other agencies, as appropriate, with the preservation of special status species and their associated habitat and wildlife movement corridors through the administration of the SEAs and other programs.
  - Policy C/NR 3.8: Discourage development in areas with identified significant biological resources, such as SEAs.
  - Policy C/NR 3.10: Require environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, and permanently preserve mitigation sites.
  - Policy C/NR 3.11: Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities.
- Goal C/NR 4: Conserved and sustainably managed woodlands.
  - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands that are conserved in perpetuity with a goal of no net loss of existing woodlands.

Summary of Local Biological Considerations

The Revised Oil Well Ordinance is consistent with the County's biological resource protection framework, including the SEA Ordinance, Oak Tree Permit requirements, Hillside Management Area design guidelines, and the Oak Woodland Conservation Management Plan. By eliminating the development of new oil wells and requiring the removal of existing fossil fuel infrastructure, the Project:

- Supports native habitat preservation;
- Prevents further industrial encroachment into ecologically sensitive areas;
- Aligns with County goals to maintain biological diversity and ecosystem function;
- And advances the General Plan's vision for long-term ecological resilience and open space conservation.

Individual decommissioning activities are subject to subsequent CEQA review by the California Department of Conservation Department of Geologic Energy Management (CalGEM) and therefore must be reviewed for potential site-specific impacts.

5.4.1.2 Existing Environmental Conditions

Unincorporated Los Angeles County encompasses a remarkably diverse array of ecosystems—from coastal dunes and islands to desert scrub, mountain woodlands, and high-elevation conifer forests. This ecological richness is a result of the County's wide range of elevation, climate zones, geologic substrates, and hydrologic regimes, which together support a rich mosaic of native habitats and species. While many areas have been altered by agriculture, infrastructure, and urban development, extensive areas of native vegetation and habitat remain—particularly in the foothills, mountains, and desert regions.

Importantly, many oil production sites are situated in or near transitional areas between developed and natural landscapes, creating complex conditions for habitat value, restoration potential, and land use compatibility. The environmental setting described below reflects a countywide baseline, recognizing that the Revised Oil Well Ordinance applies to all unincorporated Los Angeles County (except the Coastal Zone) but most acutely affects existing oil production sites via its decommissioning requirements.

Hydrology and Climate

The County's climate is predominantly Mediterranean, with wet winters and hot, dry summers. While coastal areas experience relatively mild temperatures and higher humidity, inland and desert areas, such as the Antelope Valley, experience wide diurnal temperature fluctuations and much lower annual precipitation. Precipitation averages approximately 14 to 15 inches annually near the coast and in lower valleys, increasing in mountainous areas and dropping to as little as 6 to 9 inches in desert regions. This variation in moisture availability plays a significant role in defining plant communities, the presence of seasonal wetlands and vernal pools, and the distribution of wildlife.

The hydrology of unincorporated Los Angeles County is dominated by several major river systems, including the Los Angeles River, San Gabriel River, and Santa Clara River. These watercourses, along with their tributaries and ephemeral drainages, provide critical riparian habitat and wildlife corridors. Although many segments have been channelized or modified for flood control, natural streambeds persist in higher elevation and undeveloped areas. These systems also define jurisdictional boundaries for wetland regulation under federal and state law, and they frequently overlap with biologically sensitive areas recognized by the California Department of Fish and Wildlife (CDFW) and the County's Significant Ecological Areas (SEA) program.

Soils

Soil conditions across Los Angeles County are highly varied, reflecting a complex geological history of sedimentation, erosion, and tectonic uplift. Alluvial valleys contain deep, fine-textured soils capable of supporting dense riparian forests and grasslands, while upland and mountainous regions are characterized by rocky, well-drained soils that support chaparral and scrub communities. Oil field areas often contain soils that have been compacted, graded, or otherwise disturbed during previous phases of extraction, which can limit their biological productivity in the short term. However, these soils may retain native seed banks or support the reestablishment of native species over time with proper restoration and invasive species control.

Vegetation and Plant Communities

Vegetative cover in unincorporated Los Angeles County is strongly influenced by elevation, exposure, and soil moisture. Coastal sage scrub, chaparral, and oak woodlands dominate the lower elevations and hillsides, while riparian woodlands persist along stream courses. At higher elevations, montane forests composed of conifer and mixed hardwood species appear in patches. Desert scrub, alkali flats, and grasslands occur in the Antelope Valley and other arid inland areas. In oil production areas, the vegetation is often degraded or absent at active well pads, but surrounding lands may support ruderal plant communities, remnant native shrubs, and grasses. Even degraded oil field margins can support native seed banks and may be targeted for revegetation efforts using locally appropriate species assemblages. These transitional areas have the potential to provide valuable habitat if restored or converted to more compatible uses, particularly in locations adjacent to preserved open space.

Special-Status Plant Species

The California Floristic Province, which includes Los Angeles County, is globally recognized for its high biodiversity and plant endemism. Numerous special-status plant species occur across the unincorporated areas, including Braunton's Milk-Vetch, Ventura Marsh Milk-Vetch, Marsh Sandwort, and Slender Mariposa Lily. Many of these species occur in coastal sage scrub, riparian areas, or disturbed sites near existing oil fields. Surveys for rare plants are seasonally restricted, and any future decommissioning work may require focused botanical surveys consistent with CDFW protocols.

Special-Status Wildlife

Special-status wildlife known or expected to occur within unincorporated Los Angeles County include the Coastal California Gnatcatcher, Least Bell's Vireo, Burrowing Owl, Arroyo Toad, and Two-Striped Garter Snake. These species are typically associated with coastal scrub, riparian corridors, grasslands, and ephemeral streams—habitats that may exist near or within the margins of oil field sites. While active oil pads are often cleared of vegetation, adjacent areas, including access roads, undeveloped parcels, and buffer zones, may support these species or function as habitat linkages. Prior CEQA documents for oil fields, including the 2008 Baldwin Hills Community Standards District EIR, have identified sensitive species within or near operational footprints and imposed protective measures during permitting or restoration. Presence and proximity of federally listed species was confirmed through the U.S. Fish and Wildlife Service's Information for Planning and Consultation (IpaC) tool and CNDDB records.

Sensitive Natural Communities and Biological Resources

Unincorporated Los Angeles County supports a wide range of biologically sensitive habitat types and species that are recognized as priorities for conservation at the state and federal levels. Sensitive natural communities documented in the County include coastal sage scrub, chaparral,

oak woodlands, riparian forests, freshwater wetlands, and desert scrub, many of which are identified in the California Department of Fish and Wildlife's (CDFW) Natural Communities List. These communities are especially important for their ecological function, species richness, and contribution to regional connectivity. Many occur within or adjacent to designated Significant Ecological Areas (SEAs) and are targeted for long-term protection under the General Plan.

Within these sensitive communities—and in adjacent transitional zones such as oil field margins and disturbed parcels—numerous occurrences of special-status plant and wildlife species have been documented. According to the California Natural Diversity Database (CNDDB) and the U.S. Fish and Wildlife Service (USFWS), many of these occurrences are located within one mile of existing or historic oil production areas. Federally designated critical habitat for species such as the Coastal California Gnatcatcher and Least Bell's Vireo has been mapped in the Puente Hills and along key riparian corridors, including the Los Angeles and San Gabriel Rivers. In addition, remnant patches of native vegetation, including degraded coastal sage scrub, seasonal wetlands, and riparian woodlands, persist in areas like the Baldwin Hills, where they continue to support native flora and fauna.

These sensitive resources are particularly vulnerable to indirect impacts such as stormwater runoff, erosion, accidental chemical releases, hydrologic alterations, and the spread of invasive species. Oil field operations have historically contributed to these risks, and prior CEQA documents—including the 2008 Baldwin Hills Community Standards District Final EIR—have imposed protective measures such as buffer zones, biological monitoring, and targeted habitat restoration. The implementation of the Revised Oil Well Ordinance is anticipated to reduce these threats over time by facilitating the removal of incompatible infrastructure and supporting the long-term recovery of natural habitats within and adjacent to oil production areas.

Wildlife Movement and Habitat Connectivity

Wildlife movement corridors are a defining feature of the County's biological infrastructure. Regional connectivity is maintained by linkages between the Santa Monica Mountains, Simi Hills, and San Gabriel Mountains, which allow for gene flow and migration among populations of wide-ranging species. Riparian corridors—especially along the Santa Clara, San Gabriel, and Los Angeles Rivers—are also important for birds, amphibians, and small mammals. In more urbanized areas, wildlife use greenbelts, flood control channels, and utility corridors to move between fragmented habitats. Oil fields, particularly those located on the urban fringe, may intersect with these movement routes. Even degraded sites can serve as stepping-stones or refugia for mobile wildlife.

Jurisdictional Waters and Wetlands

Aquatic habitats in the County include streams, wetlands, vernal pools, and riparian zones. These features are subject to federal and state jurisdiction and are protected under the Clean Water Act, Porter-Cologne Water Quality Control Act, and California Fish and Game Code Section 1600. While some oil fields are in heavily disturbed environments, others—particularly those in or near

floodplains or ephemeral drainages—contain or abut aquatic features that support native species. During future decommissioning, these areas will require careful assessment and protection to avoid contamination, sedimentation, or alteration of natural hydrology. Individual decommissioning and site restoration actions may require project-specific biological assessments to determine whether permits or protective measures are necessary under CEQA, the Clean Water Act, or the California Fish and Game Code.

Significant Ecological Areas (SEAs) and Coastal Resource Areas (CRAs)

The County's SEA Program identifies lands with irreplaceable biological value, including areas with high species diversity, habitat rarity, or functional connectivity. Notable SEAs include the Santa Clara River SEA, the Puente Hills SEA, and the Altadena Foothills and Arroyos SEA. Coastal Resource Areas, such as the Ballona Wetlands and Malibu Coastline, receive additional protection under the California Coastal Act. Portions of these areas lie adjacent to or within former oil production sites. The Revised Oil Well Ordinance aligns with General Plan policies supporting conservation in SEAs by removing incompatible land uses and supporting restoration in previously impacted zones. See Figure 5.4-1, Significant Ecological Areas, for more details. The Project does not apply to the Coastal Zone.

Figure 5.4-1 Significant Ecological Areas



Habitat Management Plans and Local Conservation Strategies

Although Los Angeles County does not have a single, countywide Habitat Conservation Plan (HCP), several regional or site-specific HCPs and Natural Community Conservation Plans (NCCPs) exist. These include the Newhall Ranch HCP/NCCP and the Big Tujunga Dam Low-Effect HCP. Additionally, the County's Oak Woodland Conservation Management Plan provides a non-regulatory framework for preserving oak woodland habitat, which often overlaps with oil field peripheries. In certain oil fields, habitat management plans may already be in place as conditions of prior CEQA approvals or site permits.

Summary of Existing Biological Conditions

Unincorporated Los Angeles County contains some of the most ecologically diverse landscapes in Southern California. Although oil field areas are frequently disturbed and fragmented, they often lie adjacent to remnant native vegetation, riparian features, or habitat corridors. The implementation of the Revised Oil Well Ordinance provides an opportunity not only to phase out incompatible land uses but also to support the long-term restoration of native ecosystems and the protection of sensitive biological resources across Los Angeles County.

5.4.2 CEQA Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

B-1 Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

B-3 Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

B-4 Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.).

B-5 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

B-6 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

B-7 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Threshold B-4 is derived from California Public Resources Code Section 21083.4 (the Oak Woodlands Conservation Act), which requires counties to evaluate and mitigate the conversion of oak woodlands during CEQA review. While not explicitly listed in Appendix G of the CEQA Guidelines, this threshold reflects both State law and Los Angeles County policy, including the Oak Woodland Conservation Management Plan and General Plan Policy C/NR 4.1, which prioritize the preservation of oak-dominated habitats. As such, impacts to oak woodlands and other unique native woodlands are considered potentially significant for the purposes of this analysis.

5.4.3 Environmental Impacts

5.4.3.1 Methodology

The analysis of potential impacts to biological resources under the Revised Oil Well Ordinance is based on a comprehensive desktop review of publicly available biological data, regulatory maps, and relevant CEQA documentation. The methodology reflects the policy-level nature of this Draft EIR, which evaluates biological resource conditions across unincorporated areas of Los Angeles County affected by oil production.

This evaluation is informed by current geospatial datasets, agency inventories, technical publications, and previous CEQA environmental documents, including the Final Environmental Impact Report for the Baldwin Hills Community Standards District (2008). The objective of this analysis is to identify the types of biological resources that could be present in or near oil production areas and assess whether their distribution overlaps with areas that may be affected by oil well closure, decommissioning, and site restoration activities.

Database Resources

The following databases and mapping tools were reviewed to determine the potential presence of sensitive species, natural communities, regulated features (e.g., streams, wetlands), and wildlife movement corridors in the Project Area:

- California Department of Fish and Wildlife (CDFW), California Natural Diversity Database (CNDDB)
- California Native Plant Society (CNPS), Electronic Inventory of Rare and Endangered Plants

- U.S. Fish and Wildlife Service (USFWS), Information for Planning and Consultation (IpaC) Tool
- USFWS, National Wetlands Inventory (NWI)
- USFWS, Critical Habitat Mapper and occurrence datasets
- U.S. Geological Survey (USGS), National Hydrography Dataset
- USDA Natural Resources Conservation Service, Web Soil Survey
- USDA CalVeg, Ecological Group Classification
- Calflora Plant Observation Database
- CDFW, List of California Terrestrial Natural Communities
- CDFW, California Terrestrial Connectivity Viewer (CDFW 2019)
- Los Angeles County Department of Regional Planning, Significant Ecological Areas (SEA) Viewer
- GIS datasets provided or maintained by Los Angeles County for habitat overlays, land use, and zoning

These resources were used to characterize biological sensitivity within and near known oil field areas, including Baldwin Hills, Pico Canyon, Puente Hills, Santa Susana Mountains, and parts of the Antelope Valley.

Literature and Technical Sources

The following documents were reviewed to inform habitat descriptions, sensitive species occurrence patterns, and regional ecological context:

- CDFW's List of California Terrestrial Natural Communities
- CDFW's California Wildlife Habitat Relationships (CWHR) System
- USFWS species profiles for federally listed species in the region
- General Plan (Conservation and Natural Resources Element, SEA Program)
- Final Environmental Impact Report for the Baldwin Hills Community Standards District (2008)
- Initial Study for the Revised Oil Well Ordinance (March 2025)

Where available, biological survey results or mitigation measures from prior CEQA documents were used to understand local biological constraints and restoration outcomes.

Approach to Significance Evaluation

The biological resources analysis evaluates both direct and indirect impacts that may result from implementation of the Revised Oil Well Ordinance, including those related to:

- Decommissioning activities such as well plugging, equipment removal, site grading, and revegetation;
- Proximity to sensitive species, natural communities, or regulated features (e.g., wetlands, streams);
- Potential interference with wildlife movement or habitat connectivity; and
- Risk of disturbance to nesting birds or special-status species during habitat restoration or cleanup.

This analysis does not rely on parcel-level field surveys. Instead, it applies significance thresholds to available biological data and assumes that all future activities resulting from the Revised Oil Well Ordinance will comply with applicable federal, state, and County biological protection laws, including:

- The California Endangered Species Act (CESA)

- The California Fish and Game Code (e.g., Sections 1600–1616 and 2081)
- The federal Endangered Species Act (ESA)
- The Clean Water Act (Sections 401/404)
- Los Angeles County's SEA Ordinance, Oak Tree Permit regulations, and General Plan policies

Impacts are evaluated qualitatively based on known ecological conditions in the Project Area, as well as typical patterns of biological sensitivity near legacy oil infrastructure. This approach ensures that the analysis remains consistent with Appendix G of the CEQA Guidelines and provides a basis for future project-level review at the time of decommissioning.

While this section provides a countywide, policy-level evaluation of biological resource impacts, it does not preclude the need for future project-specific review. Individual decommissioning and site restoration projects may require additional CEQA documentation, focused biological studies, and coordination with resource agencies depending on the site's location, habitat sensitivity, and proximity to jurisdictional features or special-status species.

5.4.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide regulatory action that will amend the Los Angeles County Code (Titles 12 and 22), including the Baldwin Hills Community Standards District (CSD), the General Plan, and the Newhall Ranch Specific Plan to prohibit the development of new oil wells and designate existing oil wells and associated production facilities as nonconforming uses, subject to a 20-year amortization period. By the end of that period, oil operations will be required to cease and undergo decommissioning and restoration in accordance with applicable State and County standards, including those related to biological resource protection.

Key biological resource-related Project characteristics include:

- Prohibition of New Oil Wells and Production Facilities: The Revised Oil Well Ordinance prohibits the establishment of new oil wells, tanks, separators, and associated above-ground infrastructure within unincorporated areas of Los Angeles County. By eliminating the potential for future industrial encroachment into biologically sensitive areas—including Significant Ecological Areas (SEAs), riparian corridors, and native woodlands—the Project avoids the introduction of new barriers to wildlife movement, habitat fragmentation, or degradation of native vegetation communities.
- Phase-Out of Existing Oil Operations as Nonconforming Uses: All existing oil wells and production facilities will be designated as nonconforming uses and phased out over a 20-year period. These operations must adhere to updated performance standards for maintenance, noise, signage, lighting, and public safety. This phase-out reduces the long-term footprint of incompatible land uses within or adjacent to natural habitat areas, supporting the County's biological conservation goals under the General Plan.
- Decommissioning and Restoration Requirements: Following cessation of oil production, all sites will be subject to decommissioning and restoration protocols, including well plugging and abandonment, equipment removal, and revegetation as appropriate. While the Revised Oil Well Ordinance does not mandate specific biological outcomes, it enables restoration of disturbed sites in a manner that can enhance habitat quality, improve ecological connectivity, and reduce edge effects in areas bordering SEAs, oak woodlands, and other sensitive habitats. Disturbed corridors,

such as existing access roads and cleared pads, may serve as vectors for invasive plants unless actively monitored and controlled. Site-specific restoration efforts may include the removal of invasive species and the re-establishment of native plant communities, consistent with the County's Hillside Design Guidelines and Oak Woodland Conservation Management Plan. As infrastructure is removed and disturbed soils are stabilized, the risk of invasive species establishment is also expected to decline. The implementation of best management practices during decommissioning will help prevent the spread of noxious weeds and support recovery of native plant communities.

- Avoidance of Critical Habitat and Regulated Biological Features: The Project does not authorize construction, and any decommissioning activities that could affect jurisdictional wetlands, riparian zones, or federally designated critical habitat would be subject to federal and state regulatory review. These include protections under the federal Endangered Species Act, Clean Water Act (Sections 401/404), and California Fish and Game Code (Section 1600 et seq.). The Revised Oil Well Ordinance does not preclude compliance with these laws; rather, it supports their implementation by triggering site-specific review in areas where sensitive biological resources may be present.
- Application Across Diverse Ecological Contexts: The Revised Oil Well Ordinance applies to all unincorporated areas of Los Angeles County (except the Coastal Zone), which include a wide range of ecological settings—from the desert grasslands and alkali flats of the Antelope Valley to coastal sage scrub in Baldwin Hills and chaparral-oak mosaics in the Puente Hills and Santa Susana Mountains. Many oil production areas lie near remnant native vegetation, wildlife corridors, and SEAs. The Project's phase-out of oil infrastructure in these areas reduces the potential for habitat fragmentation, invasive species spread, and cumulative pressure on special-status species.
- Consistency with County Biological Resource Policies: The Project aligns with numerous biological goals and policies in the Los Angeles County General Plan, including:
    - Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs.
        - Policy C/NR 3.3: Restore upland communities and significant riparian resources, such as degraded streams, rivers, and wetlands to maintain ecological function—acknowledging the importance of incrementally restoring ecosystem values when complete restoration is not feasible.
        - Policy C/NR 3.8: Discourage development in areas with identified significant biological resources, such as SEAs.
        - Policy C/NR 3.11: Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities.
    - Goal C/NR 4: Conserved and sustainably managed woodlands.
        - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands that are conserved in perpetuity with a goal of no net loss of existing woodlands.

The removal of incompatible industrial infrastructure from these sensitive areas supports long-term County strategies to restore ecological function, promote connectivity, and reduce cumulative biological impacts.

Overall, the Revised Oil Well Ordinance is anticipated to result in long-term improvements to biological resource conditions in unincorporated Los Angeles County. While temporary and localized disturbances may occur during decommissioning, these are subject to applicable

biological resource regulations. The following sections evaluate potential impacts relative to CEQA thresholds for biological resources, considering both direct and indirect effects of the Project.

5.4.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated areas of Los Angeles County. The Project amends the Los Angeles County Code, the County's General Plan, and the Newhall Ranch Specific Plan to designate existing oil wells and related infrastructure as nonconforming uses, subject to a 20-year amortization period. By the end of this period, all oil operations must be decommissioned, and affected sites must be restored in accordance with enforceable performance standards related to well abandonment and equipment removal. Future decommissioning and restoration activities may be subject to site-level biological review and CEQA documentation, as appropriate, to ensure compliance with applicable federal, state, and County environmental regulations. If warranted by biological sensitivity or proximity to regulated resources, further environmental review may be required prior to any further approvals.

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that while the long-term phase-out of fossil fuels is ecologically beneficial, the physical implementation of these measures could generate short-term impacts to biological resources (e.g., special-status species, sensitive natural communities, wetlands, and wildlife movement), resulting in potentially significant impacts (CAP PEIR, 3.5-18 to 3.5-27). Therefore, this programmatic analysis strictly evaluates the incremental short-term impacts of the Project's decommissioning activities. Because these temporary activities are strictly governed by the Project's own enforceable Project Design Features (PDFs) and mandate compliance with existing local, state, and federal biological protection regulations, this analysis focuses on demonstrating how these existing frameworks ensure any short-term biological impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

From a biological resources standpoint, the Project is expected to result in two primary types of effects:

- Short-term, localized disturbance during the decommissioning of oil infrastructure. These activities—such as equipment staging, grading, and vegetation clearing—may temporarily affect habitat or occur in proximity to sensitive natural communities, jurisdictional features, or special-status species. However, these effects are expected to be limited in scope and duration and subject to future project-specific review and regulatory compliance.
- Long-term ecological improvement, resulting from the elimination of industrial operations within or adjacent to sensitive habitats, Significant Ecological Areas (SEAs), wildlife corridors, riparian zones, and degraded remnants of native plant communities. Over time, the Project is expected to reduce habitat fragmentation and facilitate restoration of disturbed areas.

The Revised Oil Well Ordinance does not authorize new development or physical alteration of land. However, decommissioning actions may occur in or near biological resources and could trigger applicable federal or state review. The Project's effects on biological resources are therefore evaluated based on its potential to cause either direct or indirect impacts to sensitive habitats, species, or wildlife movement corridors during implementation.

This section evaluates the Revised Oil Well Ordinance's potential impacts relative to the CEQA thresholds of significance identified in *Section 5.4.2*, using a qualitative, countywide approach that considers:

- The proximity of oil production infrastructure to documented occurrences of special-status species and sensitive natural communities;
- The location of oil field areas relative to jurisdictional wetlands, streams, and riparian corridors;
- The overlap between oil operations and County-designated SEAs, wildlife corridors, and restoration priority zones;
- The Project's consistency with applicable biological protection policies under local, state, and federal law;
- And the potential for indirect or cumulative effects due to changes in land use compatibility or site restoration outcomes.

The analysis draws data from the California Natural Diversity Database (CNDDB), USFWS critical habitat mapping, Los Angeles County GIS data, and prior environmental documentation for existing oil fields. This policy-level assessment is designed to identify areas of biological sensitivity and regulatory concern and does not preclude future site-specific reviews as required under CEQA and applicable permitting frameworks.

Impact 5.4-1: Would the proposed Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? [Threshold B-1]

Less than Significant Impact.

The Revised Oil Well Ordinance is a regulatory land use action that prohibits the development of new oil wells and designates existing oil wells and associated infrastructure as nonconforming uses, subject to a 20-year amortization period. Under the Project, all oil production sites must be decommissioned and restored in accordance with enforceable County standards and applicable state and federal biological resource regulations.

While the Project does not authorize any new ground disturbance or land use intensification, future decommissioning activities—such as equipment removal, grading, or revegetation—may occur in or near areas that support candidate, sensitive, or special-status species. These species include the Coastal California Gnatcatcher (Polioptila californica californica), Least Bell's Vireo (Vireo bellii pusillus), Burrowing Owl (Athene cunicularia), Braunton's Milk-Vetch (Astragalus brauntonii), and other plant and wildlife species documented in the California Natural Diversity Database (CNDDB) and USFWS IpaC system.

However, the majority of oil field infrastructure is in areas already disturbed by long-term industrial activity. These areas typically support minimal native vegetation and have reduced habitat value for most sensitive species.

The Project includes no provision for expansion, intensification, or redevelopment of oil-related land uses, and any temporary, localized disturbances during decommissioning will be subject to future CEQA review and regulatory permitting under:

- The California Endangered Species Act (CESA);
- The federal Endangered Species Act (FESA); and
- The County's SEA Ordinance and Oak Tree Permit requirements.

Additionally, the relatively gradual implementation—with oil operations having a 20-year period for closure—allows for site-level biological assessments that can avoid or mitigate any potential species impacts. Past CEQA documents, including the 2008 Baldwin Hills CSD Final EIR, demonstrate the feasibility of protecting special-status species during oil field decommissioning through a combination of pre-activity surveys, biological monitoring, seasonal work windows, and restoration commitments.

In this context, the Revised Oil Well Ordinance is expected to result in a net long-term benefit to special-status species by:

- Reducing chronic disturbance and industrial activity in ecologically sensitive areas;
- And facilitating habitat restoration following oil field closure.

For these reasons, the Project would not have a substantial adverse effect, either directly or through habitat modification, on any candidate, sensitive, or special-status species. To address potential short-term disturbances during decommissioning, any ground-disturbing activities will be subject to mandatory compliance with existing state and federal laws, including the California Endangered Species Act (CESA) and the federal Endangered Species Act (FESA), as well as the County's Significant Ecological Areas (SEA) Ordinance. These existing regulatory frameworks legally mandate project-specific biological resources assessments, pre-construction surveys, and construction monitoring where necessary to ensure the avoidance of special-status species. Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the potential for incremental short-term impacts is minimized to the maximum extent feasible. Therefore, the impact is considered less than significant.

Impact 5.4-2: Would the proposed Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? [Threshold B-2]

Less than Significant Impact.

The Revised Oil Well Ordinance would prohibit the development of new oil wells and associated infrastructure in unincorporated Los Angeles County and designate all existing oil production facilities as nonconforming uses subject to a 20-year amortization period. After operations cease, each site would be decommissioned and restored in accordance with enforceable County and state standards.

Sensitive natural communities—such as riparian woodlands, coastal sage scrub, chaparral, oak woodlands, vernal pools, and wet meadows—are found throughout unincorporated Los Angeles County and are recognized as priorities for conservation by the California Department of Fish and Wildlife (CDFW) and the U.S. Fish and Wildlife Service (USFWS). These communities are also identified in the County's General Plan (including the SEA Program), and Oak Woodland Conservation Management Plan, and are often associated with wildlife corridors, rare plant habitat, and hydrologically sensitive zones.

Although most active well pads are currently disturbed and support little to no intact natural vegetation, adjacent buffer zones or undeveloped margins may support sensitive natural communities, particularly in areas like the Baldwin Hills, Santa Susana Mountains, and Puente Hills. As infrastructure is removed and sites are restored, short-term construction-equivalent activities such as grading or vegetation removal could temporarily affect sensitive habitat patches. However, these effects would be localized, highly dispersed, and limited in duration, and they would be subject to future CEQA review and avoidance or mitigation measures where applicable.

Importantly, the long-term outcome of the Project is anticipated to be ecologically beneficial. By phasing out oil operations in and near biologically sensitive areas, the Project would eliminate sources of:

- Physical disturbance (e.g., grading, equipment staging);
- Ongoing emissions or discharges (e.g., hydrocarbons, sediment runoff);
- Vegetation clearance, invasive species pressure, or fire risk.

Decommissioning and restoration will create opportunities for the recovery of native plant communities, consistent with County policy (e.g., General Plan Policies C/NR 3.1, 3.3, and 3.8) and supported by best management practices for habitat restoration and erosion control. Where riparian habitat or other sensitive natural communities are present, avoidance and buffer measures will be required in accordance with applicable law, including Fish and Game Code Section 1602, the Porter-Cologne Water Quality Control Act, and relevant County ordinances.

In addition, any site-specific impacts to jurisdictional habitat or SEA-designated natural communities would be addressed through:

- Biological resource assessments at the time of site-specific Project implementation; and
- Compliance with the County's SEA Conditional Use Permit requirements where applicable.

In summary, while temporary impacts to sensitive natural communities could occur during decommissioning, they would be minimized through regulatory compliance and best practices. The long-term effect of removing oil infrastructure from these areas is expected to enhance habitat integrity and promote the restoration of native vegetation communities.

Impact 5.4-3: Would the proposed Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? [Threshold B-3]

Less than Significant Impact.

The Revised Oil Well Ordinance prohibits the establishment of new oil wells and associated production infrastructure in unincorporated Los Angeles County and designates existing oil operations as nonconforming uses, subject to a 20-year amortization period. Upon cessation of oil production, facilities must be decommissioned and restored in accordance with applicable County and state standards.

Although the Project does not directly authorize ground disturbance or development, future decommissioning activities—such as grading, equipment removal, or access road deconstruction—could occur in proximity to wetlands, vernal pools, or other waters subject to federal and state jurisdiction. These include aquatic features regulated under:

- Section 404 of the Clean Water Act (U.S. Army Corps of Engineers);
- Section 401 of the Clean Water Act (Regional Water Quality Control Board);
- Porter-Cologne Water Quality Control Act (State Water Resources Control Board); and
- Section 1602 of the California Fish and Game Code (California Department of Fish and Wildlife).

Wetlands and other aquatic features in unincorporated Los Angeles County occur in both natural and modified settings, including along ephemeral stream channels, vernal pool depressions in the Antelope Valley, riparian corridors in the Santa Clara and Los Angeles River watersheds, and seasonally inundated areas. In some cases, oil wells, pipelines, or access roads are located adjacent to or within the buffer zones of these sensitive features. However, most active production infrastructure is sited in historically disturbed areas, and direct overlap with intact, functional wetlands is relatively limited.

Phasing out oil operations will eliminate long-term sources of contaminant input, sediment discharge, hydrological alteration, and vegetation clearance that have historically affected adjacent wetland function. Decommissioning and site restoration will require compliance with federal and state permitting processes, including wetland delineation, mitigation planning, and post-closure monitoring where applicable. All decommissioning will be subject to:

- Best management practices (BMPs) for erosion and sediment control;
- Avoidance of direct fill or grading in jurisdictional features unless authorized;
- Site-specific CEQA review if ground disturbance occurs near aquatic habitat; and
- Coordination with applicable agencies (USACE, RWQCB, CDFW) during implementation.

The General Plan further discourages encroachment into aquatic habitat. Policy C/NR 3.11 calls for the preservation of riparian habitats, streambeds, wetlands, and native woodlands “in a natural state, unaltered by grading, fill, or diversion activities.” The Revised Oil Well Ordinance is

consistent with this policy and will reduce the likelihood of future development pressures on wetlands by removing long-term industrial land uses near aquatic resource areas.

In summary, although short-term decommissioning may involve localized, temporary activity near jurisdictional wetlands or waters, these actions are expected to be carefully managed under existing regulatory frameworks. Over the long term, the Project is anticipated to improve conditions for wetland health by removing a source of hydrological and ecological disturbance. Therefore, potential impacts to federally or state-protected wetlands would be less than significant.

Impact 5.4-4: Would the proposed Project convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)? [Threshold B-4]

Less than Significant Impact.

The Revised Oil Well Ordinance prohibits the development of new oil wells and phases out existing oil production operations in unincorporated Los Angeles County over a 20-year amortization period. Decommissioning and restoration activities will be conducted in accordance with applicable state and County regulations, including those that govern the protection of oak woodlands and other native woodland resources.

While oak woodlands and other unique native woodlands—such as stands of southern California black walnut, Joshua tree, and desert juniper—are found in parts of unincorporated Los Angeles County, oil production facilities are generally located in areas that have been previously disturbed and cleared of natural vegetation. Active well pads, access roads, and tank sites rarely support intact native woodland structure or canopy cover. However, woodland fragments and isolated mature trees may persist along the margins of oil fields, especially in areas such as the Santa Susana Mountains and the Santa Clarita Valley. In these areas, careful site-level review will be required during decommissioning to avoid inadvertent encroachment or removal of protected tree resources.

Under the County's Oak Tree Permit Ordinance (Los Angeles County Code Chapter 22.174), native oak trees measuring 8 inches or more in diameter (or 12 inches cumulative for multi-trunk trees) are protected, and no removal, destruction, or encroachment within their dripline is permitted without an approved Oak Tree Permit. The protected zone includes the area within the dripline plus 5 feet, or a minimum of 15 feet from the trunk, whichever is greater. These requirements apply to both individual development projects and land restoration efforts.

In addition, the Oak Woodland Conservation Management Plan encourages preservation, conservation, and mitigation of oak woodlands through voluntary and project-level strategies. The Revised Oil Well Ordinance is consistent with these policies and promotes long-term compatibility

with oak woodland protection goals by eliminating fossil fuel infrastructure in areas where restoration of oak habitat may be feasible.

Moreover, the General Plan includes several relevant biological policies, including:

- Policy C/NR 3.10, which requires environmentally superior mitigation for unavoidable impacts to biologically sensitive areas, including woodland habitats;
- Policy C/NR 3.11, which discourages development in native woodlands;
- And Policy C/NR 4.1, which calls for the preservation and restoration of oak woodlands with a goal of no net loss.

Although temporary ground disturbance could occur during decommissioning, any such activity in proximity to native woodland stands or mature oaks would be subject to regulatory compliance, site-level biological review, and tree protection measures required under local ordinance or state law.

In summary, the Revised Oil Well Ordinance does not authorize or facilitate the conversion of intact oak woodlands or other unique native woodlands. On the contrary, the Project will eliminate industrial land uses that may conflict with native woodland protection and create opportunities for habitat restoration in areas previously cleared or degraded. For these reasons, impacts to oak woodlands and other native woodland types would be less than significant.

Impact 5.4-5: Would the proposed Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? [Threshold B-5]

Less than Significant Impact.

The Revised Oil Well Ordinance prohibits new oil well development in unincorporated Los Angeles County and requires the gradual phase-out and decommissioning of existing oil operations over a 20-year amortization period. Once operations cease, infrastructure must be removed, and sites must be restored consistent with applicable County and state standards. These actions are expected to result in long-term improvements to habitat connectivity and wildlife movement conditions across unincorporated Los Angeles County.

Oil production sites are frequently located in transitional areas between developed and natural landscapes, including regions that intersect with Significant Ecological Areas (SEAs), riparian corridors, and upland scrub habitats that support native wildlife corridors. In some cases, oil infrastructure—such as access roads, noise walls, and pipelines—has fragmented habitat and introduced physical and acoustic barriers to wildlife movement. These effects are particularly relevant in areas such as the Puente Hills, Santa Susana Mountains, and Santa Clarita Valley, where documented wildlife linkages support mountain lions, bobcats, deer, and other wide-ranging species.

The decommissioning of oil production sites and the removal of fencing, structures, and equipment will incrementally eliminate many of these barriers. Over time, this is expected to restore functional connectivity between habitat patches, reduce edge effects, and improve opportunities for species to move across fragmented landscapes. Localized corridor improvements may also benefit migratory birds, small mammals, and amphibians that rely on riparian greenways such as the Los Angeles, San Gabriel, and Santa Clara Rivers.

Short-term disturbances from decommissioning—such as increased equipment activity, noise, or minor grading—could temporarily displace wildlife from the immediate area or interrupt localized movement patterns. However, these effects are expected to be:

- Localized and relatively brief;
- Subject to seasonal timing restrictions, such as avoidance of nesting season or critical migration windows, per existing state and federal regulations; and
- Mitigated through standard best management practices, including limiting nighttime work and preserving vegetated buffer zones where feasible.

The Project is consistent with the County's General Plan policies that prioritize wildlife movement and habitat connectivity, including:

- Policy C/NR 3.1, which calls for conserving and enhancing the ecological function of diverse natural habitats;
- Policy C/NR 3.2, which supports innovative strategies to permanently dedicate open space and biological resources;
- Policy C/NR 3.9, which outlines specific planning considerations for development within SEAs to maintain linkages and minimize edge effects.

In summary, while localized and temporary effects on wildlife movement may occur during decommissioning, the long-term effect of the Revised Oil Well Ordinance is anticipated to be beneficial by removing infrastructure that currently interferes with wildlife corridors and nursery sites. Therefore, the impact would be less than significant.

Impact 5.4-6: Would the proposed Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? [Threshold B-6]

Less than Significant Impact.

The Revised Oil Well Ordinance is designed to reduce the long-term environmental footprint of oil production in unincorporated Los Angeles County by prohibiting new oil wells and phasing out existing facilities over a 20-year amortization period. As such, the Project supports and is consistent with local policies and ordinances that protect biological resources.

Numerous biological protections are embedded in the Los Angeles County Code and General Plan. These include, but are not limited to:

- The Oak Tree Permit Ordinance (County Code Chapter 22.174), which prohibits unauthorized removal or encroachment on protected oak trees;

- The Significant Ecological Area (SEA) Ordinance (County Code Chapter 22.102), which regulates land use in designated areas of high biological value and requires SEA Conditional Use Permits for development that could affect sensitive habitat;
- The Hillside Management Area (HMA) Ordinance (County Code Chapter 22.104), which includes provisions for protecting biological integrity in steep-slope terrain;

The Revised Oil Well Ordinance does not authorize or facilitate new development, grading, or land use intensification that could conflict with these protections. Instead, it ensures that existing nonconforming oil uses will be phased out, and that any future activity on decommissioned sites—including restoration, revegetation, or adaptive reuse—will be subject to existing County regulations and discretionary approvals.

For example, if decommissioning work occurs in proximity to native oak trees or woodland habitat, the Oak Tree Permit Ordinance would apply, and the County would require biological resource review prior to any ground disturbance. Similarly, any site located within a designated SEA would remain subject to the SEA Conditional Use Permit process, including compliance with development standards, habitat buffers, and protected tree requirements.

The Project is also consistent with key General Plan goals and policies, including:

- Goal C/NR 3: Permanent, sustainable preservation of genetically and physically diverse biological resources and ecological systems including: habitat linkages, forests, coastal zone, riparian habitats, streambeds, wetlands, woodlands, alpine habitat, chaparral, shrublands, and SEAs;
    - Policy C/NR 3.10: Require environmentally superior mitigation for unavoidable impacts on biologically sensitive areas, and permanently preserve mitigation sites;
    - Policy C/NR 3.11: Discourage development in riparian habitats, streambeds, wetlands, and other native woodlands in order to maintain and support their preservation in a natural state, unaltered by grading, fill, or diversion activities;
- Goal C/NR 4: Conserved and sustainably managed woodlands.
    - Policy C/NR 4.1: Preserve and restore oak woodlands and other native woodlands that are conserved in perpetuity with a goal of no net loss of existing woodlands.

Because the Project does not involve changes to zoning, land use designations, or regulatory exemptions—and because it results in the removal of industrial operations that could otherwise create ongoing compliance issues—it is not expected to conflict with any local policies or ordinances that protect biological resources.

In summary, the Revised Oil Well Ordinance is fully aligned with Los Angeles County's biological conservation framework. It supports the implementation of existing resource protections and reduces future risks of ordinance conflicts. Therefore, the impact would be less than significant.

Impact 5.4-7: Would the proposed Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? [Threshold B-7]

No Impact.

The Revised Oil Well Ordinance prohibits the development of new oil wells and phases out existing oil production operations within unincorporated Los Angeles County over a 20-year amortization period. The Project does not authorize any new development, grading, or land use changes, and does not affect zoning or policies that would conflict with adopted Habitat Conservation Plans (HCPs), Natural Community Conservation Plans (NCCPs), or other biological conservation strategies.

Although portions of unincorporated Los Angeles County are located within the boundaries of existing HCPs or NCCPs—such as the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan—the Revised Oil Well Ordinance does not conflict with any of the provisions or biological goals of these plans. Oil field areas within or adjacent to conservation planning areas will remain subject to applicable biological regulations and consultation requirements at the time of decommissioning, if relevant.

The Project aligns with conservation goals by eliminating incompatible industrial uses and reducing long-term biological stressors such as habitat fragmentation, noise, and localized pollution. If future site-specific activity were to fall within the boundaries of a conservation planning area, all applicable measures would be implemented in coordination with relevant agencies, including the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service.

Because the Revised Oil Well Ordinance does not conflict with, amend, or interfere with any adopted HCP, NCCP, or other habitat conservation framework, the Project would result in no impact under this significance threshold.

5.4.4 Cumulative Impacts

This section evaluates whether the Revised Oil Well Ordinance (the Project), when considered in combination with other past, present, or reasonably foreseeable future projects, would result in cumulatively considerable impacts to biological resources, as required under CEQA Guidelines Section 15130.

For the purposes of this analysis, the cumulative impacts study area is defined as Los Angeles County, including the unincorporated areas affected by the Project, and extending into adjacent incorporated areas and ecological regions with connected biological resources. This includes the Angeles National Forest and Santa Monica Mountains in the north and northwest, as well as the Santa Ana Mountains in the southeast. This geographic scope reflects the regional scale of biological processes, such as species migration, habitat connectivity, watershed function, and the presence of contiguous or overlapping Significant Ecological Areas (SEAs), riparian corridors, critical habitat, and wildlife movement linkages.

Cumulative biological impacts in this region can result from incremental degradation or fragmentation of native habitats, loss of sensitive species populations, disruption of wildlife corridors, or long-term encroachment into areas identified for conservation. Projects that convert

natural vegetation, impair hydrologic function, increase edge effects, or introduce barriers to wildlife movement all contribute to regional ecological decline.

The analysis below considers whether the Revised Oil Well Ordinance, in conjunction with these regional pressures, would contribute incrementally and meaningfully to such adverse effects—or whether it supports the conservation of sensitive biological resources over time.

Impact 5.4-8: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? [Threshold B-1]

Less than Significant Impact.

Cumulative loss and degradation of habitat for special-status species is a well-documented environmental issue in Los Angeles County. Regional development, infrastructure expansion, fragmentation of habitat corridors, and past land conversion have contributed to the long-term decline of sensitive plant and wildlife species. This trend continues in certain parts of Los Angeles County—particularly in urban-wildland interfaces and foothill areas—despite local, state, and federal protections.

Within unincorporated areas, many species listed or designated as special status under the California Endangered Species Act (CESA), federal Endangered Species Act (FESA), or local planning documents face cumulative threats from multiple sources, including:

- Ongoing urbanization near habitat linkages;
- Invasive species encroachment;
- Wildfire pressure;
- Pollution and hydrologic change;
- And habitat isolation in SEAs and riparian zones.

Notable sensitive species affected by these regional trends include the Coastal California Gnatcatcher, Least Bell's Vireo, Arroyo Toad, Burrowing Owl, Slender Mariposa Lily, and various CNPS-ranked native plant species.

The Revised Oil Well Ordinance is a land use regulation that prohibits new oil development and requires the phase-out and decommissioning of existing oil operations over a 20-year amortization period. As such, it does not introduce new physical disturbance or authorize development that could exacerbate these trends. Instead, the Project represents a reduction in potential adverse effects on special-status species by:

- Phasing out fossil fuel infrastructure that currently degrades adjacent habitat or edge conditions;
- Reducing noise, vehicle activity, and invasive species risk near habitat areas;
- Enabling long-term site restoration and recolonization by native species in areas bordering SEAs, wildlife corridors, and riparian features.

Although decommissioning may generate temporary, localized disturbances, such activities are expected to be dispersed and short in duration, and subject to compliance with CESA, FESA, and the County's SEA regulations. Any site-specific impact to sensitive species would be evaluated at the time of implementation and avoided or mitigated accordingly.

In the context of broader land use patterns in Los Angeles County, the Revised Oil Well Ordinance does not contribute to a cumulative loss of habitat or population viability for special-status species. Rather, it aligns with conservation efforts by reducing long-term industrial pressures and facilitating future ecological recovery in areas previously degraded by oil operations.

Therefore, when considered together with other past, present, and reasonably foreseeable projects in the region, the Project's incremental contribution to cumulative impacts on special-status species would not be cumulatively considerable, and the cumulative impact would be less than significant.

Impact 5.4-9: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? [Threshold B-2]

Less than Significant Impact.

Sensitive natural communities such as riparian woodlands, coastal sage scrub, oak woodlands, wetlands, and vernal pools are increasingly fragmented or degraded across Los Angeles County as a result of historic and ongoing development, transportation infrastructure, altered hydrology, and invasive species pressure. These communities are recognized by the California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), and the General Plan as high-priority biological resources that contribute to species diversity, watershed health, and ecological connectivity.

Cumulative impacts to these habitats stem from the incremental loss of native vegetation, degradation of hydrologic regimes, and edge effects that reduce the structure and function of remaining habitat patches—particularly in urban-wildland interfaces and the foothills of the Santa Susana, San Gabriel, and Santa Monica Mountains.

The Revised Oil Well Ordinance is a regulatory policy that prohibits new oil development and phases out existing oil operations over a 20-year amortization period. The decommissioning requirements of the Project apply to numerous sites within or near areas mapped as Significant Ecological Areas (SEAs), riparian corridors, or degraded coastal scrub habitats. These areas have long experienced impacts from industrial uses, including vegetation clearance, slope grading, invasive species introduction, and runoff from impermeable surfaces.

By requiring the removal of oil-related infrastructure and prohibiting future expansion, the Project reduces chronic stressors that contribute to cumulative degradation of sensitive natural communities. In the long term, the Project supports improved habitat conditions through:

- Elimination of infrastructure and impervious surfaces that interfere with native plant regeneration;
- Reduction in light, noise, and edge effects that affect adjacent habitat;
- Opportunities for passive or active restoration of native vegetation in former well pads and access corridors;
- Improved hydrologic function in riparian areas and wetlands currently impacted by operational grading or altered drainage patterns.

Although decommissioning may result in short-term, localized vegetation removal or soil disturbance, these effects are expected to be temporary, limited in extent, and subject to protective measures under CEQA and applicable biological regulations (e.g., Fish and Game Code §1600, SEA Ordinance, General Plan Policies C/NR 3.3 and 3.11). Any future disturbance to sensitive communities would be assessed at the project-specific level and mitigated through BMPs, seasonal timing, or habitat restoration, as required by law.

When considered alongside regional land use trends and conservation programs, the Revised Oil Well Ordinance does not contribute to a cumulative decline in sensitive natural communities. Instead, it promotes ecological recovery in areas historically affected by incompatible industrial land uses.

Therefore, the Project's contribution to cumulative impacts on riparian habitat and other sensitive natural communities would be less than significant.

Impact 5.4-10: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? [Threshold B-3]

Less than Significant Impact.

Across Los Angeles County, federally and state-protected wetlands—including marshes, vernal pools, coastal estuarine areas, and riparian corridors—have experienced long-term degradation due to cumulative stressors such as development, altered hydrology, sedimentation, invasive species, and industrial encroachment. These wetland systems are critical for maintaining biodiversity, water quality, and flood resilience and are protected under multiple regulatory frameworks, including:

- Clean Water Act Sections 404 and 401 (U.S. Army Corps of Engineers and Regional Water Quality Control Board);
- Porter-Cologne Water Quality Control Act (State Water Resources Control Board);
- And California Fish and Game Code Section 1602 (California Department of Fish and Wildlife).

The Revised Oil Well Ordinance does not authorize new land disturbance or development, nor does it propose infrastructure changes that would result in the direct fill, grading, or conversion of wetlands. Rather, it prohibits new oil production and phases out existing operations over a 20-year amortization period. The Project applies to oil field areas that are typically sited on disturbed lands, but in some locations may occur in proximity to ephemeral drainages, seasonal wetlands, or riparian fringe zones—particularly in the Santa Clara River watershed, Baldwin Hills, and portions of the Antelope Valley.

When considered in a cumulative context, the Revised Oil Well Ordinance contributes positively to the regional health of wetland systems by:

- Eliminating industrial sources of contaminant runoff, sediment loading, and hydrological alteration;
- Reducing long-term risks of spill events, equipment failure, or inadvertent disturbance to sensitive hydrologic features;
- Creating opportunities for buffer zone restoration or passive revegetation adjacent to jurisdictional waters.

Although limited temporary disturbances may occur during decommissioning (e.g., well-capping, access road removal, or contouring), these activities will be managed through regulatory compliance and best management practices. All future ground-disturbing activity within or adjacent to potentially jurisdictional waters would be subject to:

- Wetland delineation and pre-activity biological surveys;
- Avoidance and minimization strategies;
- And any necessary Section 404, 401, or 1602 permits issued by federal and state resource agencies.

General Plan Policy C/NR 3.11 specifically discourages grading, fill, or diversion in riparian and wetland habitats, and the SEA Ordinance provides further restrictions on development near aquatic features. The Project is consistent with these policies and actively reduces pressure on wetland systems by eliminating incompatible land uses over time.

In summary, while cumulative stressors continue to affect wetlands in Los Angeles County, the Revised Oil Well Ordinance does not contribute to those pressures. Instead, it supports long-term wetland resilience and restoration. As such, the Project's incremental contribution to cumulative impacts on state or federally protected wetlands would be less than significant.

Impact 5.4-11: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inches in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)? [Threshold B-4]

Less than Significant Impact.

Across unincorporated Los Angeles County, oak woodlands and other native woodlands—such as those dominated by southern California black walnut, desert juniper, or Joshua tree—are subject to ongoing pressures from regional development, road expansion, utility infrastructure, wildfire risk, and land conversion. These pressures contribute to the incremental loss and fragmentation of native woodland habitats, particularly in foothill and transition zones between urban and wildland areas.

The California Oak Woodlands Conservation Act (Public Resources Code §21083.4) recognizes the ecological and cultural value of oak-dominated communities and requires counties to evaluate and, where feasible, mitigate the conversion of oak woodlands under CEQA. At the local level, the County implements this requirement through its Oak Tree Permit Ordinance (County Code Chapter 22.174) and supports long-term conservation through the Oak Woodland Conservation Management Plan, which emphasizes preservation, on-site integration, and mitigation for unavoidable impacts.

The Revised Oil Well Ordinance does not involve new development, land grading, or intensification of land use. Rather, it is a regulatory land use action that:

- Prohibits the establishment of new oil wells and associated infrastructure in unincorporated County areas;
- Requires the gradual decommissioning of existing oil operations over a 20-year amortization period;
- And mandates site restoration consistent with County and State environmental standards.

Most active oil production sites are in previously disturbed areas that do not support intact oak woodlands or other unique native woodland structures. However, some oil fields lie adjacent to or within proximity to native woodland patches, particularly in the Santa Susana Mountains, Montebello Hills, and foothill areas surrounding the Antelope Valley. In these locations, future decommissioning activities may occur near protected trees or remnant woodland stands, and any such activities will remain subject to:

- The Oak Tree Permit Ordinance, which requires avoidance of tree removal and encroachment into root protection zones unless permitted;
- General Plan Policies C/NR 4.1 and C/NR 3.11, which call for woodland preservation and discourage development in riparian and native woodland habitats;
- Site-specific CEQA review and biological resource assessments, where applicable.

When considered in combination with other past, present, and reasonably foreseeable projects in unincorporated Los Angeles County, the Revised Oil Well Ordinance does not contribute to the cumulative conversion or degradation of oak woodlands or other unique native woodlands. In fact, by phasing out incompatible industrial land uses and supporting habitat recovery, the Project is aligned with local and state woodland conservation objectives.

Therefore, the Project's incremental contribution to cumulative impacts on oak woodlands and other unique native woodland resources would be less than significant.

Impact 5.4-12: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? [Threshold B-5]

Less than Significant Impact.

Cumulative impacts to wildlife movement corridors and nursery sites are a regional concern in Los Angeles County, where decades of land development, road expansion, fencing, and habitat fragmentation have narrowed or severed linkages between key habitat areas. Regional connectivity—especially between the Santa Monica Mountains, Simi Hills, San Gabriel Mountains, and Puente-Chino Hills—has been identified as critical for the long-term viability of species with large home ranges, including mountain lions, bobcats, and mule deer. In lower-elevation zones, riparian corridors such as the Santa Clara, Los Angeles, and San Gabriel Rivers serve as movement routes for small mammals, amphibians, reptiles, and migratory birds.

Industrial activities, including oil production, contribute to these cumulative effects by introducing barriers to wildlife movement, such as noise, lighting, cleared vegetation, and linear infrastructure like pipelines and fences. In certain locations—particularly along the edges of oil fields in Baldwin Hills, Montebello Hills, Santa Clarita Valley, and the Santa Susana Mountains—legacy oil infrastructure overlaps with or borders habitat corridors and wildlife nursery areas.

The Revised Oil Well Ordinance would not result in new construction, grading, or expansion of land uses that impede wildlife movement. Rather, it would:

- Eliminate sources of ongoing physical and sensory disturbance, including fencing, access roads, lighting, and noise;
- Support the restoration of degraded buffer areas and edge habitat, thereby improving permeability across fragmented landscapes;
- Remove long-term industrial operations that currently limit access to nursery sites and safe breeding or rearing habitat;
- And allow for the reestablishment of native vegetation and natural cover in areas that may serve as stepping-stones for wildlife movement.

Although temporary construction-type activity may occur during decommissioning, such as vehicle access or light grading, these effects are expected to be:

- Brief and highly localized;
- Spread over a 20-year implementation window, avoiding concurrent impact on multiple corridor segments;
- Managed through standard best practices such as limiting nighttime work, avoiding key breeding seasons, and preserving vegetated buffers.

The County's General Plan further prioritizes the protection of wildlife movement, including:

- Policy C/NR 3.2, which supports permanent protection of habitat linkages;
- Policy C/NR 3.6, which encourages preservation of species movement corridors;

- Policy C/NR 3.9, which guides development in SEAs to maintain linkages and avoid edge degradation.

When viewed cumulatively with other restoration, conservation, and open space initiatives across the County, the Revised Oil Well Ordinance contributes positively to wildlife movement by removing long-term industrial obstructions and supporting the reestablishment of ecological connectivity. Therefore, the Project's incremental contribution to cumulative impacts on wildlife movement corridors and nursery sites would be less than significant.

The removal of oil production reduces noise, light, and physical barriers that disrupt habitat connectivity. Although decommissioning activities may temporarily disturb wildlife movement, these impacts are brief and limited in extent. Cumulatively, improved habitat conditions and reduced industrial disturbances support enhanced connectivity and wildlife movement, resulting in less than significant impacts on wildlife corridors and nursery sites.

Impact 5.4-13: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? [Threshold B-6]

Less than Significant Impact.

Across Los Angeles County, cumulative impacts to biological resources are influenced not only by direct land disturbance, but also by gradual erosion of protections when local ordinances or policies are not upheld across projects. Over time, fragmentation of habitat, unauthorized tree removal, and inadequate enforcement can diminish the effectiveness of biological resource policies, especially in areas with high ecological sensitivity, such as Significant Ecological Areas (SEAs), oak woodlands, and riparian corridors.

The County has adopted multiple ordinances and policy tools to prevent such degradation, including:

- The Oak Tree Permit Ordinance (County Code Chapter 22.174), which protects native oak trees and their root zones from unauthorized removal or encroachment;
- The Significant Ecological Area (SEA) Ordinance (Chapter 22.102), which requires discretionary permits and compliance with design standards to preserve sensitive biological resources;
- The Hillside Management Area (HMA) Ordinance (Chapter 22.104), which promotes protection of steep-slope habitats and biological resources in hillside settings;
- And conservation policies embedded throughout the General Plan, such as Policies C/NR 3.1, 3.6, 3.10, 3.11, and C/NR 4.1.

The Revised Oil Well Ordinance does not introduce any new development or land uses that would conflict with these protections. Rather, it:

- Phases out existing oil operations that often occur in or near protected habitat areas;
- Reduces cumulative pressure on SEAs and natural woodland corridors; and
- Eliminates the need for new discretionary permit conflicts within protected habitat overlays.

While other development projects in the region may incrementally affect tree resources or biological habitat, the Revised Oil Well Ordinance contributes positively to cumulative outcomes by removing a class of industrial land uses that historically contributed to biological resource degradation. Any short-term activity associated with decommissioning (e.g., grading, equipment removal) would be subject to existing regulatory frameworks, including the SEA and Oak Tree Permit ordinances. In addition, any future land use changes on decommissioned parcels would remain fully subject to discretionary review under applicable County regulations.

For these reasons, the Project would not conflict with local biological policies or ordinances, and its contribution to cumulative policy-related impacts would be less than significant.

Impact 5.4-14: Would the proposed Project, when combined with other past, present, or reasonably foreseeable projects, conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? [Threshold B-7]

No Impact.

The Revised Oil Well Ordinance is a land use policy that prohibits the development of new oil wells and designates existing oil production operations as nonconforming uses, requiring their phase-out over a 20-year amortization period. The Project does not include any new development or infrastructure expansion, nor does it alter land use designations, zoning, or discretionary entitlements within areas governed by a Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

While some areas of unincorporated Los Angeles County fall near or within the geographic boundaries of adopted or in-progress conservation plans—such as the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan—the Revised Oil Well Ordinance does not authorize activity within these planning areas and does not conflict with their biological goals, management standards, or regulatory triggers.

The Project's long-term effect is the removal of infrastructure and operations that currently impact habitat connectivity, ecological integrity, and adjacent open space lands. These changes are compatible with regional conservation planning efforts, including:

- The maintenance and enhancement of wildlife corridors; and
- The reduction of industrial pressure on riparian zones and buffer areas.

Additionally, any future decommissioning activity near a conservation planning area would remain subject to applicable CEQA review and regulatory consultation under the Endangered Species Act (Section 10), California Fish and Game Code, and local ordinances, ensuring continued alignment with any conservation plan requirements.

In the cumulative context, the Revised Oil Well Ordinance supports—rather than undermines—the goals of local, regional, and state conservation frameworks. It reduces the County's overall industrial footprint in sensitive areas and enables long-term habitat stewardship opportunities through decommissioning and restoration.

Because the Project neither facilitates nor contributes to inconsistencies with any adopted HCP, NCCP, or related conservation strategy, it would result in no impact under this threshold.

5.4.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to biological resources resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project's primary long-term effect is a beneficial reduction in industrial hazards and environmental impacts, as it removes incompatible industrial uses from sensitive habitats. Any temporary, short-term risks associated with the decommissioning of existing oil production facilities are minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and local regulations, as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.4.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to biological resources. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks. Because the Project does not result in significant impacts to biological resources, no CEQA mitigation measures are necessary.

5.4.7 Level of Significance After Mitigation

The Project's impacts related to biological resources were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.4.8 References

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CHAPTER 5.5 CULTURAL RESOURCES

This section evaluates the potential for the Revised Oil Well Ordinance (the Project) to cause significant impacts to historical or archaeological resources, or to human remains, in the unincorporated areas of Los Angeles County. This analysis addresses whether implementation of the Project could cause a substantial adverse change in the significance of a historical or archaeological resource, or disturb human remains, in accordance with the California Environmental Quality Act (CEQA) Guidelines (§15064.5) and Appendix G. Tribal Cultural Resources are addressed separately in Section 5.18, in accordance with Public Resources Code §21074 and §21080.3.1 (SB 18 and AB 52 requirements). Paleontological Resources are addressed in Section 5.7, Geology and Soils, in accordance with the current California Environmental Quality Act (CEQA) Guidelines (§15064.5) and Appendix G.

This section provides a description of the regulatory and environmental setting relevant to cultural resources, the thresholds of significance used in the analysis, and the methods and criteria used to evaluate potential impacts. The analysis is policy-level and focuses on the potential for impacts resulting from the adoption and implementation of the Revised Oil Well Ordinance. As described in Section 3, Project Description, the Project is regulatory in nature and does not authorize specific development or physical site disturbance. However, the policy's long-term implementation—including the amortization and decommissioning of existing oil wells and associated infrastructure—may lead to future discretionary actions that could affect previously undisturbed ground or encounter built features with cultural or historical value.

The County received comments regarding the need to protect cultural resources, including potential archaeological and historical sites. As noted in Table 2-1: Summary of Scoping Comments Received, commenters, including the City of Culver City, expressed concern that ground-disturbing activities associated with the project could unearth or damage previously undiscovered cultural resources. The analysis in this chapter is responsive to these comments and evaluates the potential for the project to impact these resources. Paleontological resources are discussed in more detail in Section 5.7 Geology and Soils, while Section 5.18 analyzes the Project's potential to impact Tribal Cultural Resources.

5.5.1 Environmental Setting

5.5.1.1 Regulatory Setting

Federal Regulations

Federal laws and regulations establish the framework for identifying, evaluating, and protecting cultural and archaeological resources on federal lands and in connection with federal undertakings. Although the Revised Oil Well Ordinance is a County-led policy initiative with no direct federal component, these federal statutes are relevant to the analysis because they establish widely recognized standards for resource protection, may apply to future site-specific actions involving federal lands or funding, and help guide best practices for managing cultural resources, including historic oil infrastructure and archaeological sites, during the decommissioning of oil facilities.

Archaeological Resources Protection Act of 1979 (ARPA)

ARPA governs the protection of archaeological resources located on federal and Native American lands. It prohibits the unauthorized excavation, removal, damage, or trafficking of archaeological materials and establishes permitting requirements and criminal penalties for violations. While the Revised Oil Well Ordinance applies to lands under County jurisdiction, not federal, ARPA is relevant in instances where federal lands or resources are affected by the cumulative phase-out of regional oil infrastructure, or where federal lands are within proximity to decommissioned well sites. If future site-specific actions occur near federal lands—such as National Park Service property or Bureau of Land Management land—ARPA may require compliance with federal protection protocols for nearby archaeological sites.

National Historic Preservation Act of 1966 (NHPA), including Section 106

The NHPA establishes the federal government's role in preserving the nation's historical and archaeological resources. Of particular importance is Section 106, which requires federal agencies to consider the effects of their undertakings on historic properties listed or eligible for listing in the National Register of Historic Places (NRHP). Although this policy-level project does not trigger a federal undertaking, the NHPA is relevant in two ways:

- Future site-specific decommissioning activities may involve federal permits or funding (e.g., through CalGEM if federal cost recovery is involved), which would trigger a Section 106 review.
- Historic oil field infrastructure, such as Well No. 4 in Pico Canyon (a National Historic Landmark), is subject to protection under NHPA. While the Revised Oil Well Ordinance does not authorize direct physical changes to such resources, it may prompt long-term actions that intersect with their historical context and should be carefully evaluated in future reviews.

National Register of Historic Places (NRHP)

The NRHP is the official federal list of historic places deemed worthy of preservation. Resources must meet one or more criteria related to their significance in American history, architecture, archaeology, engineering, or culture. Resources such as Well No. 4 in the Santa Clarita Valley—

California's first commercially successful oil well—are listed in the NRHP and receive protections accordingly. While the Ordinance itself does not propose alterations to these resources, this analysis considers whether the indirect effects of the phase-out, such as site remediation or abandonment of infrastructure, could result in adverse changes to listed or eligible properties. Any future discretionary actions that would affect the setting, context, or integrity of such resources may be subject to additional review under CEQA or federal law.

National Historic Landmarks (NHLs)

National Historic Landmarks are properties designated by the Secretary of the Interior as nationally significant. NHLs receive a heightened level of scrutiny under Section 106 of the NHPA. As noted above, Well No. 4 (Pico Canyon) is designated as an NHL. The Revised Oil Well Ordinance does not modify, relocate, or remove any NHL structures, but future actions taken under the Ordinance (e.g., restoration of associated oil field areas) may require consideration of NHL protection standards.

Native American Graves Protection and Repatriation Act (NAGPRA)

NAGPRA mandates the respectful handling and repatriation of Native American human remains and cultural items found on federal or tribal lands. While the Project Area does not include tribal or federal land, the statute is referenced here because tribal consultation (under AB 52 and SB 18) may reveal connections to ancestral remains or items of cultural patrimony that require sensitive handling during decommissioning or restoration. Additionally, should federally affiliated items be inadvertently discovered during site disturbance, NAGPRA principles would help inform best practices for treatment, even on non-federal lands.

Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR § 68)

These Standards guide the appropriate preservation, rehabilitation, restoration, and reconstruction of historic buildings and structures. They are not legally binding on local projects unless federal funds or permits are involved, but they are widely used by local governments—including Los Angeles County—for evaluating alterations to historic resources.

Summary of Federal Cultural Considerations

The federal regulatory framework plays an important contextual and, in some cases, procedural role in the protection of cultural and archaeological resources within Los Angeles County. Although the Revised Oil Well Ordinance itself does not directly authorize ground disturbance or development subject to federal approval, future site-specific activities—such as decommissioning of infrastructure—may implicate federal laws if they involve federal lands, funding, or permitting.

Key statutes such as the National Historic Preservation Act (NHPA) and Native American Graves Protection and Repatriation Act (NAGPRA) establish protocols for the identification, evaluation,

and treatment of historic and cultural resources, including those of tribal significance. The presence of resources such as Well No. 4 in Pico Canyon, a National Historic Landmark, underscores the need for careful planning and coordination to avoid unintentional adverse effects to resources of national significance. Additionally, standards established under the Secretary of the Interior's Guidelines and the Paleontological Resources Preservation Act offer widely accepted methodologies for the stewardship of cultural and scientific resources that may guide future CEQA compliance, even when federal triggers are not present.

Collectively, these federal laws and guidelines help define the significance of certain resource types, reinforce best practices for preservation and mitigation, and provide a foundation for evaluating indirect or cumulative impacts that may arise from implementation of the Revised Oil Well Ordinance over time.

State Laws, Regulations, and Policies

The State of California has enacted a range of statutes, regulations, and policies to identify, protect, and manage cultural, historical, archaeological, and tribal resources. These laws are foundational to environmental review under CEQA and inform how counties like Los Angeles identify, evaluate, and mitigate potential impacts to sensitive resources. The following laws and institutions are particularly relevant to the implementation of the Revised Oil Well Ordinance, especially as future site-specific actions related to decommissioning, remediation, or land conversion may affect resources protected under state jurisdiction.

California Environmental Quality Act (CEQA)

CEQA (Public Resources Code § 21000 et seq.; CEQA Guidelines Title 14 CCR § 15000 et seq.) is the primary environmental statute in California that mandates consideration of impacts on historical, archaeological, and paleontological resources, as well as human remains. Under CEQA, cultural resources are considered a subset of the environment and are subject to environmental review. CEQA requires agencies to identify historical resources that may be affected by a proposed project and avoid or mitigate adverse changes to those resources when feasible.

CEQA defines a "historical resource" as any resource listed in, or eligible for listing in, the California Register of Historical Resources (CRHR), or a local register, or any resource determined significant by a lead agency based on substantial evidence (Guidelines § 15064.5). Substantial adverse changes to the significance of a historical resource—including demolition, relocation, or alteration—are considered significant impacts under CEQA. The CEQA Guidelines also recognize unique archaeological and paleontological resources as sensitive, nonrenewable resources, and provide thresholds for their protection.

For the Revised Oil Well Ordinance, decommissioning of infrastructure may require further CEQA review of resource conditions on a site-by-site basis, particularly in areas of known or potential sensitivity.

California Register of Historical Resources (CRHR)

Established in 1992 (Public Resources Code § 5024.1), the CRHR is the state's authoritative guide to California's significant historical and archaeological resources. The CRHR serves as the primary evaluation framework for historical resources under CEQA. Properties listed in or formally determined eligible for the National Register of Historic Places (NRHP) are automatically included in the CRHR. Other resources may be nominated by local governments, state agencies, or private individuals and must meet one or more of the following criteria:

- Association with events that have made a significant contribution to broad patterns of local, regional, or state history;
- Association with persons important to local, California, or national history;
- Embodiment of the distinctive characteristics of a type, period, or method of construction, or association with a master craftsperson or architect; or
- Potential to yield important information in prehistory or history.

The Revised Oil Well Ordinance affects sites where oil infrastructure, equipment yards, access roads, and other features may be associated with historic oil field operations. In such cases, the County will apply CRHR criteria in evaluating the significance of potential historical features during future project-level CEQA reviews.

California Historical Landmarks and Points of Historical Interest

California Historical Landmarks (CHLs) are properties of statewide historical importance, formally designated by the State Historical Resources Commission (SHRC) and California State Parks. To qualify, resources must meet one of the following criteria:

- Be the first, last, only, or most significant of its type in California or a major region;
- Be associated with individuals or groups having a profound influence on California history;
- Be a prototype or outstanding example of a style, period, or master architect or builder.

Similarly, California Points of Historical Interest are properties of local or regional significance. Many are listed in the CRHR if designated after 1997. These listings, while more locally focused, may still be subject to CEQA's protective framework if a lead agency determines the site is a "historical resource."

The Revised Oil Well Ordinance may affect parcels associated with such designations. For example, Well No. 4 in Pico Canyon—a designated CHL and National Historic Landmark—illustrates the importance of applying appropriate protections and reviewing physical changes under both CEQA and related planning policies.

State Historic Preservation Officer (SHPO) and Office of Historic Preservation (OHP)

The SHPO, appointed by the Governor, leads the Office of Historic Preservation (OHP), the state's coordinating agency for preservation policy. The SHPO oversees the CRHR and maintains the California Historical Resources Inventory (HRI), which consolidates state, local, and federal data on eligible and listed resources. SHPO review may be required for certain undertakings involving federal or state funding or permitting. Additionally, local governments often rely on SHPO guidance when evaluating potential cultural resources, particularly where the historical significance is not well documented.

Native American Heritage Commission (NAHC) and Sacred Lands

Established under Public Resources Code § 5097.91, the NAHC maintains an inventory of sacred lands and cemeteries of religious or cultural significance to California Native American tribes. The NAHC is also empowered to mediate disputes and assist with the identification and treatment of Native American resources, especially those uncovered during construction or grading. Public Resources Code § 5097.98 requires the NAHC to notify Most Likely Descendants (MLDs) when Native American remains are discovered and guide consultation on appropriate treatment.

Because oil decommissioning activities can involve excavation or soil disturbance, the Revised Oil Well Ordinance recognizes that such activities could uncover previously unknown human remains or cultural materials. Compliance with NAHC protocols, in tandem with CEQA and AB 52, is required in such cases.

California Public Resources Code – Resource Protection Provisions

The PRC includes multiple statutes that govern the protection of cultural and archaeological resources:

- § 5097.5: Prohibits unauthorized excavation, removal, or defacement of archaeological or paleontological resources on public lands, including those owned by counties or cities. Violations may be prosecuted as misdemeanors, with penalties including fines and jail time.
- §§ 5020–5029.5: Define the role of the SHRC and outline procedures for evaluating and registering historical resources.
- §§ 5079–5079.65: Establish the responsibilities of the OHP, including management of the California Heritage Fund.
- §§ 5097.9–5097.991: Provide additional protections for Native American sacred sites and authorize the NAHC to intervene when such resources are threatened.

These statutes are especially relevant in oil well abandonment in sensitive locations, including Significant Ecological Areas (SEAs) or previously undeveloped parcels.

California Government Code – Confidentiality Provisions

Government Code § 6254(r) and § 6254.10 protect sensitive cultural resource information from public disclosure under the California Public Records Act. This is particularly important during

CEQA review and tribal consultation processes under AB 52 and SB 18. Confidentiality provisions prevent looting, desecration, or vandalism of sacred or archaeological sites.

California Health and Safety Code §§ 7050.5 and 7052

These statutes govern the discovery and treatment of human remains:

- § 7050.5: Requires that all ground disturbance cease upon discovery of human remains, followed by immediate notification of the County Coroner. If the remains are determined to be Native American, the NAHC must be contacted within 24 hours.
- § 7052: Establishes criminal penalties for the unlawful disturbance or removal of human remains.

The Revised Oil Well Ordinance anticipates that some future site activities associated with decommissioning may trigger these protections. Contractors and agencies will be required to comply with these standards as part of site-specific implementation.

State Historical Building Code (SHBC)

The SHBC (Health and Safety Code §§ 18950–18961) provides alternative building standards for designated historic structures. These allow more flexible approaches to restoration and code compliance while preserving character-defining features.

California Coastal Act of 1976

The Coastal Act (Public Resources Code § 30000 et seq.) protects cultural and archaeological resources within the Coastal Zone, defined as extending inland approximately 1,000 yards, and up to five miles in some rural areas. The Revised Oil Well Ordinance does not apply within the Coastal Zone; however, where infrastructure is located near coastal boundaries, activities such as well closure or site restoration may trigger jurisdictional review by the California Coastal Commission or require coordination with Coastal Plan policies.

Senate Bill 18 (SB 18) – Traditional Tribal Cultural Places

SB 18 (Gov. Code § 65352.3 et seq.) mandates tribal consultation during the adoption or amendment of general or specific plans. Because the Revised Oil Well Ordinance includes amendments to the County General Plan, the County is required to consult with California Native American tribes to determine whether the proposed changes may affect Traditional Tribal Cultural Places (TTCPs). SB 18 establishes timelines, consultation procedures, and reporting requirements designed to preserve tribal heritage in the land use planning process.

Summary of State Cultural Considerations

California's legal framework provides comprehensive protections for cultural, historical, archaeological, and tribal resources. These protections are central to the CEQA process and form the basis for identifying, evaluating, and mitigating the potential impacts associated with the Revised Oil Well Ordinance (the Project). While the Project is a policy-level action, it establishes a regulatory framework that will result in future physical activities, including oil well abandonment, site remediation, and restoration. These actions may involve ground disturbance or alterations to infrastructure, triggering the need for site-specific compliance with state laws protecting cultural resources.

Key state laws such as the California Environmental Quality Act (CEQA), Public Resources Code Sections 5097.5 and 5097.98, and the California Health and Safety Code Section 7050.5 provide protocols for the treatment of archaeological sites, paleontological resources, and human remains, respectively. The California Register of Historical Resources (CRHR), State Historical Landmarks Program, and State Historical Building Code establish the criteria and flexibility for evaluating, designating, and preserving historically significant structures—including those associated with the oil industry.

Additionally, the Project involves General Plan amendments, which trigger statutory consultation requirements under Senate Bill 18 (SB 18) for Traditional Tribal Cultural Places. In conjunction with Assembly Bill 52 (AB 52), these laws require early and meaningful consultation with California Native American tribes regarding impacts to tribal cultural resources. Tribal consultation is a key element of the Project's environmental review and is intended to inform the protection of both known and previously undocumented cultural landscapes.

The Native American Heritage Commission (NAHC) plays a central role in tribal consultation, sacred lands identification, and treatment protocols for human remains, while the Office of Historic Preservation (OHP) and the State Historic Preservation Officer (SHPO) provide oversight of state and federal preservation programs.

Together, these statutes and programs ensure that any future physical effects of the Project—such as those resulting from decommissioning—will be subject to rigorous review and mitigation under CEQA and applicable state laws. These considerations are integral to the impact analysis provided in this section and will continue to guide project implementation and future discretionary review.

Local Regulations

The protection of historical, archaeological, and paleontological resources in unincorporated Los Angeles County is governed by a combination of County General Plan policies, adopted ordinances, and review procedures that align with CEQA and state preservation law. These local regulations serve as the foundation for resource identification, designation, and mitigation during planning, permitting, and environmental review processes.

Implementation of the Revised Oil Well Ordinance is subject to these requirements, particularly as future site-specific actions—such as oil well decommissioning—may result in physical impacts to known or unknown cultural resources. County-level policies ensure that these effects are properly evaluated and addressed.

County of Los Angeles General Plan

The County's General Plan establishes countywide policies to guide the identification, protection, and management of cultural, historical, and paleontological resources. The Plan requires all zoning ordinances, general plan amendments, subdivisions, capital improvement programs, and public works projects to be consistent with adopted goals and policies, including those that protect cultural heritage.

Relevant policies are contained in Goal C/NR 14: Protected historic, cultural, and paleontological resources, which directs land use decisions to avoid or mitigate adverse effects on cultural resources to the maximum extent feasible. The following policies are directly applicable to implementation of the Project:

- Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
- Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
- Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.
- Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
- Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.
- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

These policies are binding on all future actions taken pursuant to the Project and will guide the review of site-specific activities such as well plugging or structure removal within sensitive cultural landscapes.

Los Angeles County Historic Preservation Ordinance (Title 22, Chapter 22.124)

Adopted by the Board of Supervisors in 2015 (Ordinance No. 2015-0033), the Historic Preservation Ordinance (HPO) implements General Plan policy by establishing a formal process for identifying and designating historic resources within the unincorporated areas of the County. The HPO provides criteria for the designation of individual landmarks and historic districts, along with protections to ensure that contributing features are not altered or demolished without appropriate review.

The HPO applies to:

- Privately owned property in unincorporated areas;
- Public landmarks under County jurisdiction (excluding those listed post-demolition or under certain religious exemptions).

To be designated as a Landmark or as a contributing property within a Historic District, a resource must generally be at least 50 years old and meet one or more of the following criteria:

- Association with events that significantly contributed to history;
- Association with important persons in local, state, or national history;
- Embodiment of distinctive architectural characteristics or artistic values, or association with a significant architect, engineer, or builder;
- Potential to yield important information in history or prehistory;
- Formal eligibility or listing in the National Register of Historic Places or California Register of Historical Resources;
- Significance as one of the largest or oldest trees of its species in the County (for tree resources);
- Association with a historic event, person, or neighborhood through a natural feature.

During implementation of the Project, this ordinance ensures that any potential impact to designated or eligible historic resources will require a discretionary review process by County planning staff, the Historic Landmarks and Records Commission (HLRC), and the Board of Supervisors as necessary. This process is fully integrated with CEQA and would be triggered by alterations, removals, or physical site changes resulting from oil infrastructure retirement.

Los Angeles County Historical Landmarks and Records Commission (HLRC)

The HLRC serves as the County's advisory body for historic preservation matters, including the identification and evaluation of potential landmarks and contributing properties. The Commission recommends nominations to the State Historical Resources Commission and supports cultural resource studies, historic surveys, and nominations to the CRHR and NRHP.

As future discretionary decisions are made under the Project, the HLRC may play a critical role in evaluating whether built features meet criteria for local or state significance and in accordance with the Secretary of the Interior's Standards.

Mills Act Ordinance (Ordinance No. 2013-0057)

The County's Mills Act Ordinance allows for voluntary preservation of historic properties through a contractual agreement between the County and the property owner, enabling significant reductions in property taxes in exchange for maintaining and rehabilitating the property in accordance with the Secretary of the Interior's Standards.

Eligibility is currently limited to:

- Properties individually listed on the NRHP or CRHR;

- Contributing resources within a listed or eligible historic district.

While the Mills Act is voluntary, it may serve as an incentive tool for private property owners affected by the Project who seek to preserve former oil production-related structures with historical value.

County Code (Titles 21 and 22) Consistency Requirements

Under Titles 21 (Subdivisions) and 22 (Planning and Zoning) of the Los Angeles County Code, all planning and zoning actions—such as subdivisions, zoning amendments, and discretionary permits—must be consistent with the General Plan. This includes adherence to policies protecting cultural, archaeological, and paleontological resources. The County may require discretionary review to ensure that future development or infrastructure removal under the Project does not adversely affect significant cultural sites without first identifying, evaluating, and mitigating those impacts under CEQA and County code.

Summary of Local Cultural Considerations

The Revised Oil Well Ordinance establishes a phased approach to ending oil extraction in unincorporated Los Angeles County by designating existing oil wells and associated infrastructure as nonconforming uses and requiring their decommissioning over a defined amortization period. While the Project itself is regulatory in nature, its implementation will necessitate a range of physical activities—such as infrastructure removal, grading, well abandonment, site remediation—that may directly or indirectly affect cultural resources.

Los Angeles County's local policies and ordinances provide a comprehensive framework for identifying, evaluating, and protecting historical, archaeological, and paleontological resources that may be impacted by these activities. The General Plan's resource conservation policies (notably Goal C/NR 14 and associated policies), the Historic Preservation Ordinance, and the discretionary review process administered by the Historical Landmarks and Records Commission (HLRC) collectively require that any potential cultural resource impacts be disclosed, analyzed, and addressed in accordance with CEQA and County procedures.

Together, these local regulations ensure that cultural resource protection is fully integrated into the Project's implementation process and that significant resources—whether designated or newly identified during site-level review—are preserved or treated appropriately. These requirements are essential to maintaining consistency with CEQA's intent and the County's long-term preservation goals.

5.5.1.2 Existing Environmental Conditions

Cultural Setting

Prehistoric Cultural Setting

Archaeological evidence indicates that Los Angeles County has been continuously occupied by Indigenous peoples for thousands of years. The cultural chronology of the region is generally divided into five major periods based on changes in material culture, environmental adaptation, and subsistence strategies.

1. Proto-Archaic Period (ca. 9000–6000 B.C.): This period marks the earliest known human occupation in Southern California, including Los Angeles County. The Chumash are believed to have been among the earliest peoples in the region. They were primarily hunter-gatherers and fishers who occupied coastal and inland zones and developed technologies adapted to the region's abundant natural resources.

2. Middle Archaic Period (ca. 6000–3000 B.C.): The Chumash became increasingly sophisticated in their technologies and social organization. This period is marked by advancements in basketry, the invention of the plank canoe (tomol), early bead currency systems made from Olivella biplicata shells, and the use of tar for waterproofing. Trade networks expanded significantly during this period, linking coastal and inland communities.

3. Pacific Period (beginning ca. 2000 B.C.): Large permanent villages emerged along the Pacific coast. Social stratification increased, and trading alliances, craft specialization, and territorial boundaries became more formalized. Material remains from this period include elaborate shell bead assemblages, mortuary features, and ceremonial artifacts.

4. Late Prehistoric Period (ca. A.D. 200–1500): During this period, the Tongva people migrated west from the Mojave Desert area and gradually displaced or absorbed earlier groups in the region. By the time of European contact in the 16th century, the Tongva had established at least 25 villages across the Los Angeles Basin and neighboring valleys. Like the Chumash, the Tongva were hunters, gatherers, and active traders. Both groups managed natural resources extensively and maintained sacred landscapes across what is now Los Angeles County.

5. European contact, beginning with Juan Rodríguez Cabrillo in 1542, introduced new diseases, colonial systems, and significant cultural disruptions. Epidemics such as smallpox, influenza, and measles decimated Native populations from the 16th through the 19th centuries. Despite these impacts, both the Chumash and Tongva today maintain strong cultural ties to their ancestral lands and continue to assert sovereignty and stewardship through tribal governments and participation in environmental review.

Ethnographic Setting

The Spanish colonial period began in 1769, when Father Juan Crespí, a Franciscan missionary, recorded the area now known as Los Angeles. Spanish expeditions, including one led by Gaspar de Portolá, arrived in the region and established settlements along the Los Angeles River.

In 1771, Mission San Gabriel Arcángel was founded as the fourth of the 21 Alta California missions. In 1781, the Pueblo de la Reyna de Los Angeles was established near present-day Los Angeles City Hall. By 1797, the Spanish had extended their mission system into the San Fernando Valley with the founding of Mission San Fernando Rey de España. These missions initiated the forced relocation and conversion of Indigenous peoples, severely disrupting traditional lifeways and territorial sovereignty.

Following Mexican independence in 1821, the region entered the Rancho Period, with large land grants distributed to private citizens. This period saw the privatization of lands formerly under mission control and increased integration into the international trade economy. In 1846, the United States invaded Mexican California. The signing of the Treaty of Cahuenga in 1847 transferred control of California to the U.S., and Los Angeles County was formally established in 1850.

In the decades that followed, gold discoveries—including Francisco López's 1842 strike in Placerita Canyon—and the expansion of agriculture, ranching, and oil extraction spurred population growth and economic development. These changes continued to reshape the County's cultural landscape through the 19th and early 20th centuries.

Historical Setting

Los Angeles County was one of California's original 27 counties, incorporated on February 18, 1850. The City of Los Angeles was its first municipality; today the County includes 88 incorporated cities and many unincorporated communities.

The County quickly became a multi-ethnic population center, including Native Californians, Spanish-speaking Californios, Anglo-American settlers, freed African Americans, and immigrants from Europe, Asia, and Latin America. The Immigration and Nationality Act of 1965 led to a significant increase in foreign-born residents, transforming the cultural profile of the County. By 2000, over 130 languages were spoken in the Los Angeles Unified School District, and Los Angeles had surpassed New York City as the primary U.S. point of entry for immigrants.

This complex historical evolution has resulted in a highly diverse and layered cultural landscape with a dense distribution of archaeological sites, historic structures, and culturally significant places, particularly in unincorporated communities where development and open space often coexist.

Cultural Resources

Historical Resources

Several sites in unincorporated Los Angeles County are listed on the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks list, and as California Points of Historical Interest. Collectively, these resources reflect Indigenous settlement patterns, Spanish and Mexican colonial infrastructure, early American land uses, and the legacy of oil and industrial development in the region.

- Figure 5.5- 1 Historic Resource Sites Policy Map displays the location of listed resources in unincorporated areas.

Figure 5.5-1 - Historic Resource Sites Policy Map



Sources: Los Angeles County (2025), California State Parks (2024), and National Park Service (2024)

- Table 5.5-1 provides a summary of NRHP-listed resources.

Name	Address or Location
Andrew McNally House	654 E. Mariposa St., Altadena, California
Christmas Tree Lane	Santa Rosa Avenue Between Woodbury Avenue and Altadena Drive
Crank House	2186 Crary Street, Altadena, CA 91104
General Charles S. Farnsworth County Park	568 Mount Curve Ave., Altadena, CA 91001
Keyes Bungalow	1337 E. Boston St., Altadena, CA 91001
Pacific Electric Railway Company Substation No. 8	2245 N. Lake Ave., Altadena, CA 91001
Pico Canyon Oil Field Well No. 4	9.5 mi. N of San Fernando, W of U.S. 99
Vasquez Rocks Natural Area Park	10700 W. Escondido Canyon Rd., Agua Dulce, CA 91350
Zane Grey Estate	396 E. Mariposa St., Altadena, CA 91001
Maravilla Handball Court and El Centro Grocery	4787 Hammel St., Los Angeles, CA 90022
Golden Gate Theater	5176 East Whittier Blvd., East Los Angeles
Antelope Valley Indian Museum	15701 E. Avenue M, Lancaster, CA 93535 Lancaster, California, 93535
Dominguez Ranch Adobe	18127 S. Alameda St., Compton, CA 90220
Mount Lowe Railway	N of Altadena in Angeles NF
Scripps Hall	209 E. Mariposa St., Altadena, CA 91001
Woodbury/Story House	2606 Madison Ave., Altadena, CA 91001
Old Ridge Route	Along Old Ridge Rte., roughly bounded by Sandberg and Canton Canyon, Castaic CA
Case Study House No. 20 / Bass House	2275 N. Santa Rosa Ave., Altadena, CA 91001
View Park Historic District	Roughly bounded by Mt. Vernon, Enoro, Northland & Northridge Drs., Kenway S. Victoria & Floresta Aves.
View Park Historic District Contributors	Roughly bounded by Mt. Vernon, Enoro, Northland & Northridge Drs., Kenway S. Victoria & Floresta Aves.
Pan American National Bank of East Los Angeles	3620-3626 E. 1st St., Los Angeles, CA 90063
Zumbrota Yacht	Moored at Fishermen's Village, 13755 Fiji Way, Marina del Rey.
Wadsworth Chapel	Eisenhower Ave and Bonsall Ave. Los Angeles, CA 90049
Sawtelle Streetcar Depot	Pershing and Dewey Aves at the West Los Angeles VA Medical Center
Rogers Dry Lake	Edward's Airforce Base
Walter D. Valentine Cottage	1419 E. Palm St., Altadena, CA 91001
Tamale Building/Casa Garcia Restaurant	6421 Whittier Boulevard
6039-6041 Whittier Boulevard	6039 Whittier Boulevard
Hansel and Gretel Cottage	6144 Whittier Boulevard
Chicano Moratorium March August 29, 1970	various addresses + march route

- Table 5.5-2 lists California Historical Landmarks.

Name	Address or Location
Christmas Tree Lane	Santa Rosa Avenue Between Woodbury Avenue and Altadena Drive
Lang Southern Pacific Station	14000 Lang Station Rd., Santa Clarita, CA 91390
Mentryville	27201 Pico Canyon Rd., Newhall, CA, 91381
Pico Canyon Oil Field Well No. 4	9.5 mi. N of San Fernando, W of U.S. 99
Pomona Water Powerplant Historic Marker	Camp Baldy Rd (PM 2.0), San Antonio Canyon, near Claremont.
St. Francis Dam Disaster Site	San Francisquito Power Plant No. 2, 32300 N San Francisquito Canyon Rd, 9.2 mi N of Saugus
Old Short Cut	N 34.328° W 118.004°, Chilao Visitor's Center, Angeles Crest Hwy
Llano Del Rio Cooperative Colony	On State Hwy 138 (P.M. 64.1), Llano
Rancho San Francisco	The Old Road and Henry Mayo Drive, Valencia
Angeles National Forest / Clear Creek Vista Point	Clear Creek Vista Point, Highway 2 (Milepost 32.8)
Oak of the Golden Dream	19152 Placerita Canyon Rd., Santa Clarita, CA 91321

- Table 5.5-3 identifies Point of Historical Interest designated after 1997 that is also listed in the CRHR.

Name	Description	Address or Location
Topanga Christian Fellowship Church	Church built in 1953.	269 Old Topanga Canyon Rd., Topanga, CA 90290

- The Project Area contains one National Historic Landmark, Well No. 4 in the Pico Canyon Oil Field, located approximately 9.5 miles north of San Fernando. This site is of statewide and national significance as the first commercially successful oil well in California.

Figure 5.5-4 Pico Canyon Oil Field Well No. 4



Sources: National Park Service (2024)

Additional properties may not be formally listed but could still qualify as “historical resources” under CEQA based on integrity, significance, and potential eligibility for state or federal designation.

Archaeological Resources

Archaeological resources include both prehistoric and historic-period materials and may consist of surface or subsurface deposits. These can include artifacts, features (e.g., fire pits, house foundations), and ecological indicators (e.g., pollen, faunal remains). CEQA distinguishes between:

- Historical archaeological resources: those associated with Euro-American, Mexican, or early statehood periods.
- Prehistoric archaeological resources: those associated with Native American groups.
- Unique archaeological resources (PRC § 21083.2): those that contain important scientific data, are the best example of their type, or are linked to a significant historical event or figure.
- Isolates: small, isolated finds that are typically not eligible for listing but still require proper documentation.
- Sacred sites: areas of spiritual or ceremonial importance to Native peoples, sometimes associated with archaeological remains or oral histories.

There are over 3,979 recorded archaeological sites in Los Angeles County. Due to their sensitivity, site locations are not disclosed publicly. Archaeological materials have been recorded in both urban and undeveloped settings and may exist beneath current or former oil infrastructure.

5.5.2 CEQA Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code §§ 5024.1, Title 14 CCR, Section 4852), including the following:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources or is not included in a local register of historical resources, does not preclude a lead agency from determining that the resource may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

CR-1 Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

CR-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

CR-3 Disturb any human remains, including those interred outside of dedicated cemeteries.

5.5.3 Environmental Impacts

5.5.3.1 Methodology

The analysis of potential impacts to cultural resources is based on the CEQA Guidelines, particularly Sections 15064.5 and 21083.2 of the Public Resources Code and the criteria set forth in Appendix G. This section evaluates whether implementation of the Project could result in:

- A substantial adverse change in the significance of a historical resource;
- A substantial adverse change in the significance of an archaeological resource; or
- The disturbance of human remains, including those interred outside of formal cemeteries.

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the physical implementation of decarbonization measures—specifically earth-moving, grading, and infrastructure removal—could generate short-term, potentially significant impacts to previously unknown historical resources, archaeological resources, and human remains. Therefore, this programmatic analysis strictly evaluates the incremental short-term impacts of the Project's decommissioning activities. Because these temporary ground-disturbing activities are strictly governed by mandatory compliance with existing local and state laws (including California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and the County's Historic Preservation Ordinance), this analysis focuses on demonstrating how these existing legal frameworks ensure any short-term cultural resource impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

Although the Revised Oil Well Ordinance is a regulatory land use action rather than a development project, it establishes a framework that will result in future ground-disturbing and structure-altering activities during the phase-out of oil production. These include the removal of existing oil infrastructure, subsurface disturbance during well abandonment, and site restoration. Such actions have the potential to affect known and unknown cultural resources.

This is a policy-level analysis that considers whether the anticipated physical effects associated with implementation of the Project could impact cultural resources, and whether those effects would be significant under CEQA. The analysis is informed by:

- Historical resource inventories, including the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historical Landmarks, and California Points of Historical Interest;
- County-designated landmarks and historic districts maintained by the Los Angeles County Historical Landmarks and Records Commission (HLRC);
- Known archaeological site data maintained by the California Historical Resources Information System (CHRIS);
- Geospatial mapping of known cultural resources in unincorporated Los Angeles County;
- Applicable County regulations, including the Historic Preservation Ordinance, and General Plan policies under Goal C/NR 14 and Land Use Element Policies LU 3.2, LU 4.2, LU 7.1, and LU 10.4; and
- Recent EIRs prepared for similar Countywide planning initiatives, including the General Plan 2035 EIR, 2045 Climate Action Plan PEIR, and Renewable Energy Ordinance Final EIR.

Where appropriate, this section draws upon the framework and terminology used in those documents. The analysis focuses on potential indirect or reasonably foreseeable effects related to infrastructure removal, grading, and soil disturbance that may affect cultural resources. Because future site-specific impacts are not yet defined, this analysis does not make assumptions about resource presence or significance but rather establishes the likelihood of impact and applicable mitigation pathway.

5.5.3.2 Project Characteristics

The Revised Oil Well Ordinance is a County-initiated land use policy that applies to all unincorporated areas of Los Angeles County. The Project amends the Los Angeles County Code (Titles 12 and 22) and the General Plan to prohibit the development of new oil wells and production facilities, and to phase out existing oil operations by designating them as nonconforming uses, subject to a 20-year amortization period. Following amortization, oil operations must cease, and each site must be decommissioned and restored pursuant to County and State regulations.

Although the Project does not authorize specific new development, it establishes a regulatory framework that will lead to physical actions across multiple locations over time. These actions are

governed by the Project's built-in mandates (PDF-LU-1: Decommissioning and Site Restoration Mandate, and PDF-LU-2: Decommissioning and Infrastructure Removal) and include:

- Well plugging and abandonment in accordance with California Geologic Energy Management Division (CalGEM) standards;
- Dismantling and removal of oil-related infrastructure, such as tanks, pipelines, pump jacks, and service roads; and
- Surface restoration and grading, including the recontouring of pads, erosion control, and revegetation.

These activities could directly or indirectly affect archaeological sites, historic buildings, Native American cultural resources, or human remains, particularly where sites are in areas of known sensitivity or in association with legacy oil infrastructure. While many oil production areas are already developed and heavily disturbed, others, especially in hillside or foothill areas, may intersect with intact subsurface cultural deposits or historically significant industrial structures.

Importantly, the Project does not exempt future actions from CEQA. Site-specific environmental review will be required prior to any discretionary approval related to decommissioning or reuse. That review will include cultural resource assessments, as appropriate, based on local inventories, tribal consultation under SB 18 and AB 52, and the regulatory framework described in Section 5.5.1.

In summary, while the Revised Oil Well Ordinance is not a development project, it establishes a clear pathway toward the physical transformation of oil sites across the County, triggering activities that may affect historical and archaeological resources. These activities are foreseeable, measurable, and relevant to CEQA, and therefore warrant analysis of potential cultural resource impacts.

5.5.3.3 Impact Analysis

This section evaluates whether implementation of the Revised Oil Well Ordinance would result in significant impacts to cultural resources within unincorporated areas of Los Angeles County, based on the thresholds of significance identified in Section 5.5.2 and using the methodology described in Section 5.5.3.1. The analysis considers potential impacts that may occur because of physical activities associated with the decommissioning and restoration of oil production sites, including ground disturbance, infrastructure removal, and site grading.

Although the Project does not authorize specific development or construction, it establishes a regulatory framework that will result in long-term physical changes to sites currently used for oil extraction. These activities have the potential to affect cultural resources, including historic buildings, archaeological materials, and human remains, particularly in areas of known or suspected sensitivity. Impacts may occur through direct physical disturbance or indirectly through demolition, relocation, or alteration of historic structures and landscapes.

This analysis is qualitative in nature and focuses on whether implementation of the Project could:

- Cause a substantial adverse change in the significance of a historical resource;
- Cause a substantial adverse change in the significance of an archaeological resource;
- Disturb any human remains, including those interred outside of dedicated cemeteries.

Each subsection below evaluates the Revised Oil Well Ordinance against one of these CEQA significance thresholds. The analysis is informed by existing environmental conditions, applicable policies and regulations, and County precedent regarding treatment of cultural resources. Where relevant, potential cumulative impacts and consistency with the General Plan are also considered.

Impact 5.5-1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5? [Threshold CR-1]

Less than Significant Impact.

The Revised Oil Well Ordinance does not authorize new construction, demolition, or land use intensification. However, it establishes a regulatory framework that will result in the phased decommissioning and restoration of existing oil production sites throughout unincorporated Los Angeles County over a 20-year amortization period. These activities may include removal of surface infrastructure, well plugging, or grading. In certain cases, these actions could occur on or near sites that meet the definition of a "historical resource" under CEQA.

Pursuant to CEQA Guidelines Section 15064.5, a historical resource includes any resource listed in or determined eligible for listing in the California Register of Historical Resources (CRHR), a local register, or any object, building, structure, site, area, or place that a lead agency determines to be historically significant based on substantial evidence.

Two known historical resources with particular relevance to the Project are:

- Cone Trust House (Baldwin Hills) – This resource is located adjacent to the Inglewood Oil Field and is subject to existing protective measures under the Baldwin Hills Community Standards District (CSD). These measures require that adjacent oil production activities be conducted in a manner that does not compromise the structure's physical integrity or historical setting. The Project would not authorize any changes to the Cone Trust House or its immediate surroundings. Ongoing regulatory oversight via the Baldwin Hills CSD would remain in place during the amortization period, and any future discretionary activity at or near the site would be subject to additional environmental review.
- Well No. 4, Pico Canyon Oil Field – Designated as a National Historic Landmark and listed on the National Register of Historic Places, this site is recognized as the first commercially successful oil well in California. The well was plugged and abandoned in 1990, and no further physical activity is proposed at this location under the Project. The site is protected under federal and state law, including the National Historic Preservation Act (NHPA) and CEQA. Any future action involving physical alteration, signage, interpretation, etc. would

require consultation with the State Historic Preservation Officer (SHPO) and/or the National Park Service, as applicable.

Beyond these specific resources, the Project does not propose the removal, relocation, or physical alteration of any structure currently listed or determined eligible for listing in the CRHR or NRHP. Nor does it modify or eliminate any existing local historic designations administered by the Los Angeles County Historical Landmarks and Records Commission (HLRC). If, during implementation of the Project, future decommissioning activities intersect with previously undocumented historical resources, those activities would be subject to CEQA review and the protective measures established under the County's Historic Preservation Ordinance (Title 22) and General Plan Policy C/NR 14.1 (Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible).

To ensure long-term protection, any future discretionary action that could affect a historical resource would be subject to site-specific environmental review, including potential SHPO consultation, public disclosure, and adoption of feasible mitigation measures, as required by CEQA and applicable County procedures.

Because the Revised Oil Well Ordinance does not directly propose physical alteration or removal of historical resources, and because robust County, State, and federal protections will continue to govern treatment of any resources affected during future site-specific implementation, the Project would not cause a substantial adverse change in the significance of a historical resource. Beyond known landmarks, it is reasonably foreseeable that some aging oil infrastructure subject to decommissioning may possess unrecognized historical significance. To address this, any such demolition or alteration will be subject to mandatory compliance with existing regulatory frameworks, including the County's Historic Preservation Ordinance and CEQA Guidelines Section 15064.5. These existing regulations require that, prior to the demolition or alteration of structures with potentially significant impacts on historic architectural resources, a qualified architectural historian conduct a project-specific historic resources assessment to evaluate the resource for eligibility on the California Register of Historical Resources (CRHR). Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the potential for inadvertent destruction of historical resources will be minimized to the maximum extent feasible. Therefore, the impact is considered less than significant.

Impact 5.5-2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5? [Threshold CR-2]

Less than Significant Impact.

The Revised Oil Well Ordinance establishes a regulatory framework that prohibits the development of new oil wells and requires the phase-out of existing oil production facilities in unincorporated Los

Angeles County. As existing operations are decommissioned over a 20-year amortization period, physical activities will occur, including well plugging, pipeline removal, equipment dismantling, and surface restoration. These actions may involve ground disturbance, particularly in previously undeveloped portions of oil lease areas.

CEQA Guidelines Section 15064.5 defines a significant archaeological resource as one that meets the criteria for listing in the California Register of Historical Resources (CRHR). A resource may be considered significant if it:

- Contains information important to the prehistory or history of the region;
- Represents the best example of its type; or
- Is directly associated with an important historic person or event.

Many existing oil fields in the unincorporated County are in areas that have been previously disturbed by drilling, grading, road construction, or industrial use. As a result, the potential for encountering undisturbed archaeological deposits is generally low. However, some legacy oil sites include undeveloped or lightly disturbed areas, particularly in hillside or rural regions such as Santa Clarita Valley, Baldwin Hills, and Montebello Hills, where archaeological sensitivity remains moderate to high due to proximity to former village sites and natural resource areas.

In accordance with General Plan Policy C/NR 14.1 and Title 22 of the County Code, any discretionary ground-disturbing activity under the Project will be subject to standard archaeological resource protection protocols, which include:

- Pre-construction archaeological sensitivity training, as currently required in sensitive areas such as the Baldwin Hills Community Standards District (CSD);
- Immediate work stoppage and notification of a qualified archaeologist if any cultural materials are discovered during decommissioning;
- Evaluation of any discoveries for CRHR eligibility by a County-approved archaeologist;
- Development and implementation of a treatment or recovery plan, if necessary.

In addition, the County is required to consult with Native American tribes under Assembly Bill 52 and Senate Bill 18, where applicable, to identify any known Traditional Cultural Properties or areas of tribal concern that may intersect with decommissioning zones. These consultations will help inform future CEQA review of site-specific activities and guide protective measures as needed.

The County's standard cultural resource protection procedures, combined with existing legal requirements under CEQA (PRC § 21083.2 and § 15064.5), ensure that any significant archaeological resources discovered during implementation of the Project would be appropriately documented, evaluated, and either preserved in place or mitigated through data recovery.

The Project is also consistent with the following General Plan policies:

- Policy LU 3.2: Discourage development in areas with high environmental resources and/or severe safety hazards;

- Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18; and
- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

While ground-disturbing activities associated with decommissioning could potentially encounter archaeological materials, the likelihood of significant undiscovered archaeological resources in previously developed oil fields is low. Furthermore, any discoveries would be subject to well-established County and CEQA review procedures. With implementation of standard protocols and adherence to existing regulations, the Project would not cause a substantial adverse change in the significance of an archaeological resource. To ensure that unexpected subsurface discoveries are handled appropriately, any ground-disturbing activities will be subject to mandatory compliance with existing state and local laws, including Public Resources Code Section 21083.2. Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the potential for inadvertent destruction of archaeological resources is minimized to the maximum extent feasible. Therefore, the impact is considered less than significant.

Impact 5.5-3: Would the Project disturb any human remains, including those interred outside of formal cemeteries? [Threshold CR-3]

Less than Significant Impact.

Implementation of the Revised Oil Well Ordinance will result in the gradual decommissioning and restoration of existing oil wells and production sites over a 20-year amortization period. While no specific development or new construction is proposed by the Project, future activities, including grading, excavation, trenching, and well abandonment, have the potential to disturb previously undisturbed soils.

The Project Area consists largely of industrialized and previously disturbed oil field sites, many of which have been in active use since the early 20th century. As such, the potential for encountering intact human remains is considered low. However, human remains—particularly Native American burials—can occur outside of formal cemeteries and may be present in natural, unmarked burial contexts, especially in foothill, canyon, or coastal areas known to have been occupied by Indigenous communities prior to European colonization.

In accordance with California Health and Safety Code § 7050.5, if human remains are encountered during any ground-disturbing activity, all work must cease in the vicinity of the discovery. The County Coroner must be notified immediately, and no further disturbance may occur until the remains have been examined. If the Coroner determines that the remains are Native American, the Coroner is required to contact the Native American Heritage Commission (NAHC) within 24 hours, pursuant to Public Resources Code § 5097.98.

Upon notification, the NAHC will designate a Most Likely Descendant (MLD) who will be consulted regarding appropriate treatment and disposition of the remains. In many cases, this may involve:

- Reburial of the remains in a culturally appropriate location;
- On-site monitoring by tribal representatives; and
- Modifications to the project's ground-disturbance methods to ensure respectful avoidance.

The County will comply with these procedures and incorporate them into all applicable project-level environmental review, decommissioning permits, or site restoration plans. These measures ensure consistency with CEQA and with the following applicable General Plan policies:

- Policy LU 3.2: Discourage development in areas with high environmental resources or severe safety hazards;
- Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18; and
- Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

The County also maintains procedures for compliance with Assembly Bill 52 (PRC § 21080.3.1), which mandates tribal consultation during environmental review. If future project components subject to discretionary approval are proposed in areas with tribal cultural affiliation or known sensitivity, these consultation requirements will be triggered prior to project approval.

Although the Project primarily affects previously developed oil production sites where the likelihood of encountering human remains is low, future ground-disturbing activities could occur in locations with unknown or unmarked burials. To address this, any ground-disturbing activities will be subject to mandatory compliance with existing state laws, including California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98. These existing regulatory frameworks legally mandate strict adherence to discovery protocols, requiring immediate work stoppage within 50 feet of a discovery, notification of the County Coroner, and coordination with the Native American Heritage Commission (NAHC) and Most Likely Descendant (MLD) if Native American remains are identified. Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the potential to inadvertently disturb human remains is minimized to the maximum extent feasible. Therefore, the impact is considered less than significant.

5.5.4 Cumulative Impacts

This section evaluates whether the Revised Oil Well Ordinance, when considered in combination with other past, present, and reasonably foreseeable future projects in Los Angeles County and the broader Southern California region, would result in cumulatively considerable impacts to cultural resources, consistent with CEQA Guidelines Section 15130.

Cultural resources—particularly historic buildings, archaeological sites, and burial grounds—are finite and nonrenewable. Cumulative impacts to these resources may occur when multiple projects across a region result in the incremental loss of physical integrity, contextual setting, or scientific data associated with cultural sites. Even when individual projects have less-than-significant impacts, the combined effects of long-term regional development may contribute to the permanent degradation or loss of cultural heritage. This analysis addresses:

- Regional cumulative conditions, including ongoing development pressure, infill, infrastructure upgrades, and natural resource extraction; and
- The incremental contribution of the Project to those regional impacts, considering both physical effects and regulatory protections.

5.5.4.1 Cumulative Conditions in Los Angeles County

Los Angeles County has a rich and complex cultural history, with thousands of recorded archaeological sites, hundreds of formally designated historic properties, and ongoing tribal efforts to protect ancestral lands and traditional cultural places. Unincorporated areas contain significant cultural resources from the Chumash and Tongva cultural traditions, the Spanish and Mexican periods, and the industrial oil boom of the late 19th and early 20th centuries. Cumulative pressures on these resources include:

- Urban development, particularly in unincorporated communities experiencing housing and infrastructure expansion;
- Demolition and redevelopment of older industrial sites, some of which contain oil infrastructure with potential historical significance;
- Transportation and utility projects that may disturb subsurface archaeological resources;
- Oil field abandonment and resource extraction in previously undeveloped foothills and hillsides, where Native American cultural resources are likely to remain undisturbed;

Many of these projects are subject to CEQA review and associated mitigation measures, but the cumulative loss of contextual integrity, incremental ground disturbance, and structural modification of cultural landscapes continues to pose a regional concern. Tribal cultural resources and undocumented burial sites are particularly susceptible to disturbance across multiple projects if early consultation and site sensitivity analysis are not consistently applied.

5.5.4.2 Project Contribution to Cumulative Impacts

The Revised Oil Well Ordinance is a policy-level land use action that does not authorize specific development but instead phases out an existing, land-intensive industrial use—oil production—across unincorporated Los Angeles County. As existing operations are retired under a 20-year amortization schedule, physical site activities such as equipment dismantling, well abandonment, and site restoration will occur.

These activities involve limited ground disturbance and are anticipated to take place primarily in areas previously impacted by long-term industrial use. While such conditions reduce the likelihood of encountering intact archaeological resources or unrecorded human remains, isolated areas of cultural sensitivity may remain in undeveloped or less-disturbed portions of oil fields, particularly in foothill and canyon areas. In addition, some standing oil infrastructure may have historic or architectural value and could be eligible for future designation if not previously evaluated.

Importantly, the Project does not introduce new land uses, urban intensification, or large-scale development that would directly increase pressure on cultural resources. Rather, it reduces ongoing physical impacts from continued oil operations and subjects future ground-disturbing activities to CEQA review. This review includes:

- Site-specific cultural and tribal resource evaluations;
- Compliance with California Health and Safety Code § 7050.5 and PRC § 5097.98 regarding treatment of human remains;
- Notification and consultation with California Native American tribes under AB 52 and SB 18;
- Avoidance or mitigation of adverse effects to historical or archaeological resources under CEQA Guidelines § 15064.5; AND
- Oversight by the Los Angeles County Historical Landmarks and Records Commission for properties subject to the County's Historic Preservation Ordinance.

The Project's contribution to cumulative cultural resource impacts is not cumulatively considerable, and the overall cumulative impact would be less than significant, because the Project:

- Does not facilitate or induce new ground disturbance beyond the localized scope of decommissioning;
- Occurs primarily in previously disturbed areas where cultural sensitivity is reduced;
- Is implemented incrementally over a multi-decade period; and
- Includes mandatory compliance with federal, state, and local cultural resource protection laws to ensure any inadvertent discoveries are properly managed.

5.5.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to cultural resources resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project's primary long-term effect does not conflict with cultural resource protections and represents a beneficial reduction in industrial hazards and environmental impacts. Any temporary, short-term risks to previously unknown historical resources, archaeological sites, and human remains associated with the decommissioning of existing oil production facilities are minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and local regulations (including California Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98, and the County's Historic Preservation

Ordinance), as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.5.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to cultural resources. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks governing unanticipated discoveries and historic evaluations. Because the Project does not result in significant impacts to cultural resources, no CEQA mitigation measures are necessary.

5.5.7 Level of Significance After Mitigation

The Project's impacts related to cultural resources were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.5.8 References

Federal

National Historic Preservation Act (NHPA), United States Code, Title 16, §§ 470 et seq.

Archaeological Resources Protection Act (ARPA), United States Code, Title 16, §§ 470aa et seq.

Native American Graves Protection and Repatriation Act (NAGPRA), United States Code, Title 25, §§ 3001 et seq.

National Register of Historic Places, National Historic Landmarks Program documentation.

Secretary of the Interior’s Standards for the Treatment of Historic Properties (36 CFR Part 68).

State of California

California Office of Historic Preservation (OHP).
– California Historical Landmarks.
– California Points of Historical Interest.
– California Register of Historical Resources.

California Health and Safety Code. Section 7050.5: Disturbance of Human Remains.

California Public Resources Code:
– §§ 5020–5029.5: State Historical Resources Commission (SHRC).
– §§ 5079–5079.65: Office of Historic Preservation (OHP).
– §§ 5097.9–5097.99: Protections for Native American cultural resources, sacred sites, and human remains.
– §§ 21083.2 and 21084.1: CEQA treatment of historical and unique archaeological resources.

California Government Code:
– §§ 65352.3 et seq. (Senate Bill 18): Native American consultation requirements.
– §§ 50280 et seq.: Mills Act preservation incentives.

California Code of Regulations. Title 24, Part 8: California Historical Building Code.

Sacred Lands File, Native American Heritage Commission (NAHC).

CEQA Guidelines:
– Appendix G: Environmental Checklist.
– Sections 15064.5 and 15126.4: Evaluation and mitigation of cultural resources.

Los Angeles County Department of Regional Planning

Los Angeles County Historical Landmarks and Records Commission documents.

Environmental Impact Reports for Area Plans and Community Plans.

Revised Oil Well Ordinance Initial Study. March 2025.

Final EIR for the Baldwin Hills Community Standards District. Prepared by Marine Research Specialists, 2008.

Final EIR for the Los Angeles County General Plan Update. Prepared by PlaceWorks, 2014.

Final EIR for the 2045 Climate Action Plan. Prepared by Environmental Science Associates, 2023.

Los Angeles County General Plan 2035:
– Land Use Element
– Conservation and Natural Resources Element
– Parks and Recreation Element
– General Plan Policy Map

Title 22 – Planning and Zoning, Los Angeles County Code:

– Historic Preservation Ordinance (Ordinance No. 2015-0033).
– Mills Act Ordinance (Ordinance No. 2013-0057).
– Baldwin Hills Community Standards District (CSD) regulations.

Other Sources

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Society for California Archaeology (SCA). 2014. “Chronological and Cultural Units: Archaic.” Accessed at: www.scahome.org.

Sapphos Environmental, Inc. 2009. Cultural Resources Technical Report for the County of Los Angeles General Plan EIR.

GIS datasets and cultural sensitivity overlays provided by the Natural History Museum of Los Angeles County and the California Department of Conservation.

CHAPTER 5.6 ENERGY

This section of the Environmental Impact Report (EIR) evaluates the potential impacts of the Revised Oil Well Ordinance (the Project) on energy resources in the unincorporated areas of Los Angeles County. The Project consists of an ordinance and General Plan Amendment to prohibit new oil and gas production and phase out existing operations over a 20-year amortization period. This analysis has been prepared in accordance with the California Environmental Quality Act (CEQA), which requires an evaluation of a project's potential to cause significant environmental effects. CEQA Guidelines Appendix F specifically requires a discussion of a project's energy consumption, demand, and efficiency. This analysis considers the "whole of the action," which includes the adoption of the regulatory ordinance and the reasonably foreseeable physical changes that would result, namely the decommissioning and restoration of existing well sites.

This analysis begins with a description of the federal, state, and local regulatory framework governing energy policy and consumption. It then details the existing environmental conditions related to energy supply and demand in the Project area. Finally, it evaluates the Project's impacts against established CEQA significance thresholds to determine if the Project would:

- Result in the wasteful, inefficient, or unnecessary consumption of energy resources during its construction (decommissioning) or operational phases.
- Conflict with or obstruct the implementation of a state or local plan adopted for the purpose of promoting renewable energy or energy efficiency.
- Cause a significant effect on regional energy supply, delivery infrastructure, or fuel availability.

The analysis is based on information from technical sources including the California Energy Commission (CEC), California Public Utilities Commission (CPUC), California Air Resources Board (CARB), and U.S. Environmental Protection Agency (EPA).

During the public scoping period for this EIR, comments were received regarding potential energy impacts. Several commenters submitted remarks concerning energy, as shown in Table 2-1: Summary of Scoping Comments Received. The issues raised include the potential for a decrease in the local energy supply, the increased energy that would be used to transport replacement oil from other locations, and the potential need to expand other energy infrastructure, like the electrical grid, to meet regional demand if local production ceases. This chapter takes these comments into account and analyzes the project’s potential impacts on energy consumption and supply.

The Project is a land use policy that does not directly authorize new development. Its primary effect on the physical environment involves two countervailing energy components. The first is a short-term energy demand during the decommissioning phase, which will require the consumption of

diesel fuel for off-road equipment and on-road trucks, as well as electricity for certain activities. The second is a long-term, permanent reduction in energy consumption resulting from the cessation of all existing oil and gas extraction and processing operations. The analysis also considers the potential indirect effects of the Project on the broader state energy supply system.

5.6.1 Environmental Setting

5.6.1.1 Regulatory Setting

Federal Regulations

Energy in the United States is governed by federal statutes, regulatory programs, and executive policies that shape national energy production, distribution, infrastructure, and efficiency standards. While the Revised Oil Well Ordinance is a County-level land use regulation and does not require or authorize federal action, it is situated within this broader national policy landscape. This section provides an overview of the major federal laws and executive orders relevant to energy systems and policy, which serve as contextual background for assessing the Project's potential energy-related impacts and consistency with broader policy objectives.

Energy Policy and Conservation Act of 1975 (EPCA)

The EPCA established the foundation for federal energy conservation programs, including the Corporate Average Fuel Economy (CAFE) standards. These standards, administered by the National Highway Traffic Safety Administration (NHTSA), mandate minimum fuel economy for vehicles sold in the U.S. The EPCA has historically been a primary driver of improved fuel efficiency and reduced petroleum dependency. Although not directly applicable to local land use regulations, CAFE standards contribute to statewide energy and emissions trends and affect transportation-related energy consumption within Los Angeles County.

Energy Independence and Security Act of 2007 (EISA)

The EISA significantly expanded the federal government's role in promoting energy efficiency and renewable fuels. Key provisions include:

- Expansion of the Renewable Fuel Standard (RFS2) program, requiring increased blending of renewable fuels into transportation fuel (target: 36 billion gallons by 2022);
- Establishment of GHG performance thresholds for fuel categories to ensure emissions reductions compared to conventional petroleum fuels;
- Requirements for improved building energy performance in federal facilities and public institutions;
- Mandatory efficiency standards for appliances, lighting, and motors; and
- Federal promotion of "green jobs", carbon capture technologies, and advanced research in clean energy systems.

The EPA, in coordination with the Department of Energy (DOE), implements EISA mandates, and the Renewable Fuel Standard continues to be a central element of federal clean energy policy.

These provisions align broadly with California's decarbonization goals and the County's intent to reduce dependence on fossil fuels.

Federal Energy Regulatory Commission (FERC) Authority

FERC, under the Federal Power Act of 1935 and the Natural Gas Act of 1938, regulates the interstate transmission of electricity, oil, and natural gas. It oversees licensing of hydroelectric projects, interstate pipeline construction, and wholesale electricity markets. While the Revised Oil Well Ordinance does not interfere with interstate energy markets or facilities subject to FERC jurisdiction, its implementation supports California's transition to a distributed and decarbonized energy portfolio, consistent with FERC's evolving policies that promote grid resilience and energy storage integration.

Energy Policy Act of 2005 and Related Federal Initiatives

This act encourages development of domestic energy sources, including fossil fuels, nuclear, and renewables, and streamlines federal permitting of energy infrastructure. It also established federal tax incentives for energy efficiency and clean technologies. While the Revised Oil Well Ordinance phases out local fossil fuel production, it does not conflict with these provisions, which are largely incentive-based and do not preempt state or local land use powers.

Recent Executive Orders and Federal Policy Directives (2025)

A series of executive orders (EOs) issued in 2025 have substantially reshaped the federal government's approach to energy regulation and climate policy. Although these orders do not preempt local land use authority under California law, they are relevant to understanding current federal policy context:

- Declaring a National Energy Emergency (January 20, 2025): Declares a nationwide energy emergency, citing inadequate domestic energy infrastructure and high energy costs. Directs federal agencies to expedite leasing, permitting, and development of domestic energy sources, including on federal lands. Also invokes emergency permitting under the Clean Water Act, Rivers and Harbors Act, and Endangered Species Act. While it establishes an expansive federal policy directive to increase fossil fuel production, this EO does not supersede local authority. The Revised Oil Well Ordinance remains a valid proposal under California law as a land use regulation within the County's police powers.
- Unleashing American Energy (January 20, 2025): Revokes more than a dozen climate- and sustainability-focused executive orders from 2021–2023, including EO 14008 (Tackling the Climate Crisis) and EO 14096 (Environmental Justice). Directs all federal agencies to prioritize fossil fuel extraction, eliminate regulatory bias toward electric vehicles, and accelerate permitting for energy infrastructure projects. The County's policy to phase out urban oil operations is grounded in land use compatibility and environmental health—not in vehicle or federal energy mandates—and is therefore not preempted by this EO.
- Zero-Based Regulatory Budgeting to Unleash American Energy (April 9, 2025): Mandates that energy-related federal regulations issued by agencies such as the EPA, BLM, BOEM, and Army Corps of Engineers be subject to automatic expiration ("sunset") unless re-justified. Requires

comprehensive agency review of all energy-sector rules and establishes a regulatory deregulatory framework. This EO may weaken long-standing federal safeguards related to drilling, water protection, or endangered species, but does not alter CEQA or the County's discretion to impose more protective land use policies.

- Protecting American Energy from State Overreach (April 8, 2025): Directs the U.S. Attorney General to challenge state and local energy-related laws deemed unconstitutional, preempted, or discriminatory—particularly those related to climate policy, GHG regulation, or environmental justice. This EO reflects the current federal administration's legal posture but does not carry the force of preemption unless backed by judicial rulings or federal legislation. Local governments retain zoning authority under the California Constitution and remain responsible for enforcing CEQA.

Summary of Federal Energy Considerations

Collectively, these federal statutes and executive orders provide background on the shifting national landscape for energy policy. The Revised Oil Well Ordinance is within Los Angeles County's local land use authority and does not infringe upon any federal regulatory domain. While recent federal actions emphasize fossil fuel production and infrastructure expansion, especially on federal lands, these directives are policy statements and procedural mechanisms that do not limit the County's ability to reduce land use conflicts, mitigate public health risks, and support California's statutorily mandated energy transition by regulating the use of private property.

The Project is consistent with federal energy statutes in that it does not restrict interstate commerce, alter federal land access, or impose emissions regulations. Rather, it withdraws local zoning support for continued oil extraction, a use deemed incompatible with County General Plan goals for environmental quality, land use compatibility, and equitable development. The Project also aligns with federal policies that promote energy efficiency and diversification, particularly through the elimination of aging fossil fuel infrastructure and the opportunity for future clean energy or low-intensity land uses.

State Laws, Regulations, and Policies

California has adopted a comprehensive legal and regulatory framework to guide its transition to a low-carbon, energy-efficient economy. These policies are intended to reduce greenhouse gas emissions, promote clean and renewable energy sources, improve energy efficiency in buildings and vehicles, and reduce dependence on petroleum-based fuels. The Revised Oil Well Ordinance is consistent with the direction of state energy law and policy, which increasingly prioritizes electrification, decarbonization, and the phase-out of fossil fuel infrastructure.

The following are key state-level statutes, executive orders, and regulations that inform the energy analysis in this EIR.

Warren-Alquist Act (1974)

The Warren-Alquist State Energy Resources Conservation and Development Act created the CEC and serves as the foundation of California's energy policy. Key provisions include:

- Establishment of the first statewide energy efficiency standards for buildings and appliances;
- Transfer of electricity demand forecasting responsibilities from investor-owned utilities to the CEC, reducing bias in resource planning; and
- Mandate for a statewide research and development program to explore and deploy alternative and renewable energy sources.

These provisions continue to guide California's energy conservation and planning efforts and inform land use decisions that support energy efficiency and resource diversification.

California Energy Action Plan

The CEC and CPUC jointly adopted the first Energy Action Plan in 2003, with updates in 2005 and 2008. These plans prioritize:

- Energy efficiency;
- Renewable energy;
- Clean fossil generation;
- Transmission and distribution infrastructure improvements.

Subsequent climate legislation (e.g., AB 32, SB 100) has embedded the Action Plan's goals into broader integrated policies, including the Integrated Energy Policy Report (IEPR) process. The Project supports these principles by eliminating a source of fossil energy demand and enabling future low-intensity or renewable land uses.

California Building Standards Code (Title 24, Parts 6 and 11)

Part 6: Establishes the Building Energy Efficiency Standards for residential and nonresidential construction. Updated every three years, current standards (2022) emphasize all-electric readiness, building envelope performance, and distributed generation.

Part 11 (CALGreen): Requires mandatory sustainability measures including:

- EV charging infrastructure,
- Water- and energy-efficient plumbing and HVAC,
- Construction waste reduction, and
- Onsite renewable energy options for some project types.

These codes are directly applicable to any future reuse or redevelopment of oil well sites following decommissioning.

SB 1368 (2006) – Emissions Performance Standard

This law restricts long-term power purchase agreements by California utilities to generation sources emitting no more than 1,100 lbs CO_2/MWh, effectively excluding traditional coal-fired power. It signals California's policy commitment to low-carbon energy sources and constrains future energy imports tied to high-emissions baseload infrastructure.

AB 1493 (2002) – Clean Car Standards

AB 1493 mandates that CARB adopt rules to achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles. The standards apply to model years starting in 2009 and have been harmonized with federal fuel economy regulations. These policies reduce petroleum demand from the transportation sector and support consistency findings under CEQA.

Executive Order S-1-07 – Low Carbon Fuel Standard (LCFS)

This EO requires a 10% reduction in the carbon intensity of transportation fuels sold in California by 2020. The LCFS promotes cleaner fuels, including:

- Biofuels,
- Hydrogen, and
- Electricity for EVs.

This program directly supports CARB's efforts to decarbonize fuel supplies and reduces reliance on oil, aligning with the long-term goals of the Project.

SB 375 (2008) – Sustainable Communities Strategy

This law links regional transportation funding and land use planning to GHG reduction targets. Under SB 375, the Southern California Association of Governments (SCAG) must prepare a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The 2020–2045 RTP/SCS (Connect SoCal) identifies strategies to reduce per capita GHG emissions by:

- Encouraging infill and transit-oriented development;
- Reducing vehicle miles traveled (VMT); and
- Improving transit access and housing/jobs balance.

The Project is consistent with these strategies by eliminating a land use (oil production) that generates regional VMT through hauling, operations, and support services.

CARB Diesel Truck and Bus Regulation

This regulation (amended 2014) requires that by 2023, all diesel trucks over 14,000 pounds in California meet 2010 emission standards. This includes vehicles used in oil field operations. As oil sites are decommissioned, associated truck trips (tanker trucks, service vehicles) will be reduced, contributing to lower emissions and compliance with state air quality mandates.

Advanced Clean Cars Programs (ACC I and II)

ACC I (2012–2025) combined low-emission vehicle (LEV) and zero-emission vehicle (ZEV) standards to cut GHGs and smog-forming emissions.

ACC II (2022 onward) extends those mandates and requires that 100% of new passenger vehicle sales in California be ZEVs by 2035.

These programs accelerate California's transition away from petroleum-based transportation fuels, supporting the Project's rationale to phase out local oil production.

Advanced Clean Trucks Regulation (2020)

This regulation requires manufacturers to sell an increasing percentage of ZEV trucks starting in 2024. Fleets must report usage to inform future mandates. By 2035, the rule requires:

- 55% of light/medium trucks,
- 75% of straight trucks,
- 40% of tractor trucks sold in California to be zero-emission.

This regulation reduces demand for diesel and gasoline, further limiting the long-term role of local oil supply.

Executive Orders B-16-12 and N-79-20 – ZEV Deployment

These EOs direct state agencies to:

- Deploy 1.5 million ZEVs by 2025,
- Require 100% ZEV sales by 2035 (light-duty) and 2045 (medium- and heavy-duty),
- Integrate ZEV infrastructure into state planning, and
- Promote ZEV use in public fleets and freight.

The Project's elimination of petroleum infrastructure supports these objectives by removing supply-side fossil fuel conflicts with state goals.

AB 32, SB 32, AB 1279, and the Cap-and-Trade Program

AB 32 (2006) required statewide GHG emissions be reduced to 1990 levels by 2020. SB 32 (2016) requires a 40% reduction below 1990 levels by 2030. Most recently, AB 1279 (2022) codified a statewide policy of net-zero GHG emissions by 2045, including an 85% direct emissions reduction target. The Cap-and-Trade Program, a key AB 32 mechanism, applies to oil production facilities emitting more than 25,000 $MTCO_2e$ annually. Together, these laws create a legally binding framework that requires a rapid and sustained decline in fossil fuel combustion.

Renewable Portfolio Standard (SB 1078, SB X1-2, SB 350, SB 100, SB 1020)

California's RPS requires retail electricity providers to procure:

- 33% renewable electricity by 2020 (SB X1-2);
- 50% by 2030 (SB 350);
- 60% by 2030, and 100% carbon-free by 2045 (SB 100, SB 1020).

The Project supports these targets by reducing local fossil fuel supply and enabling future transition to non-fossil, renewable-compatible land uses.

AB 1007 (2005) – State Alternative Fuels Plan

This law mandated the development of a comprehensive plan to:

- Reduce petroleum use,
- Promote in-state biofuels production, and
- Minimize environmental harm.

The Project directly aligns with this plan's objectives by removing land uses that perpetuate fossil fuel dependence and enabling future compatibility with clean fuels infrastructure.

Summary of State Energy Considerations

California's statutory and regulatory framework unequivocally favors a long-term shift away from fossil fuel extraction toward renewable, distributed, and zero-carbon energy systems. The Revised Oil Well Ordinance is consistent with these objectives and supports statewide mandates to:

- Reduce GHG emissions,
- Accelerate electrification of transportation and buildings,
- Enhance energy efficiency and demand-side conservation, and
- Phase out petroleum infrastructure incompatible with public health and climate resilience.

While short-term energy use will be required for decommissioning, the Project's overall trajectory is toward reduced fossil fuel consumption, increased land use compatibility, and long-term consistency with the State's energy and climate action framework.

Local Regulations

The Revised Oil Well Ordinance is guided by and supports numerous County-adopted energy policies, climate targets, and building code requirements. These policies are part of a long-standing framework of local land use regulation intended to reduce reliance on fossil fuels, promote energy efficiency, support renewable generation, and ensure consistency with the State's broader decarbonization goals. This section summarizes the applicable local regulatory context.

County of Los Angeles General Plan (2035)

The General Plan 2035 establishes a comprehensive framework for energy conservation, renewable energy development, and climate mitigation in unincorporated Los Angeles County. The Project directly supports and is consistent with the following adopted goals and policies:

- Goal C/NR 12: Sustainable management of renewable and non-renewable energy resources.
    - Policy C/NR 12.1: Encourage the production and use of renewable energy resources.
        - The Project facilitates land use transitions that may enable future renewable energy development.

- Policy C/NR 12.2: Encourage the effective management of energy resources, ensuring that adequate reserves are maintained to meet peak demands.
  - By eliminating inefficient fossil fuel infrastructure, the Project reduces system inefficiencies.
- Policy C/NR 12.3: Encourage the development of distributed energy systems that utilize existing infrastructure and reduce environmental impacts.
  - Decommissioned sites may be repurposed for clean energy projects consistent with this policy.
- Goal ED 1: An economic base and fiscal structure that attract and retain valuable industries and businesses.
  - Policy ED 1.2: Encourage and foster the development of the renewable energy economic sectors.
    - The Project removes regulatory support for fossil fuel uses and promotes economic alignment with green job sectors.
- Goal M 4: An efficient multimodal transportation system that serves the needs of all residents.
  - Policies under this goal promote reduced automobile dependence, expanded transit options, and vehicle electrification. These indirectly support energy and emissions reductions that are synergistic with the Project's long-term benefits.

These policies collectively reinforce Los Angeles County's long-term commitment to energy transition and clean energy infrastructure, and the Revised Oil Well Ordinance is a key regulatory action in support of these goals.

Los Angeles County Code – Title 31: Green Building Standards Code

Title 31 of the Los Angeles County Code adopts by reference the California Green Building Standards Code (CALGreen) and incorporates energy efficiency and conservation requirements for new construction in unincorporated areas. Key provisions include:

- Section 101.4.3.6 (Energy): Mandates compliance with Title 24, Part 6 (California Energy Code) for minimum building energy efficiency.
- Conflict resolution provisions (Section 101.4.1.2): In the case of discrepancies between energy code requirements and other parts of the County Code (Titles 26–30), the more stringent provision governs.

Although the Revised Oil Well Ordinance does not propose new construction, any future redevelopment of decommissioned oil field sites would be subject to these Title 31 standards, resulting in significant improvements in energy efficiency, building performance, and GHG emissions compared to legacy oil operations.

Community Climate Action Plan (CCAP, 2015)

The 2015 CCAP was adopted as part of the General Plan 2035 to reduce GHG emissions consistent with Assembly Bill 32 (AB 32). It focused on:

- Establishing a 2010 baseline inventory;
- Achieving an 11% reduction in community-wide GHG emissions by 2020; and

- Promoting local actions to improve energy use efficiency and renewable deployment.

The Revised Oil Well Ordinance supports the CCAP's objectives by:

- Eliminating petroleum-related stationary sources of emissions;
- Enabling long-term reductions in transportation fuel use and associated GHGs; and
- Creating opportunities for compatible land uses consistent with GHG reduction strategies.

2045 Climate Action Plan (2045 CAP)

The 2045 CAP, adopted by the Board of Supervisors in 2024, builds upon the 2015 CCAP and extends the County's planning horizon through 2045, aligning with SB 100 and California's 2045 carbon neutrality goal. Key features include:

- A pathway to net-zero GHG emissions by 2045;
- Phasing out fossil fuel infrastructure in sensitive and urbanized areas;
- Promoting decarbonization of land uses, including industrial and extractive activities; and
- Expanding support for distributed energy resources, building electrification, and zero-emission vehicles.

The Revised Oil Well Ordinance is explicitly aligned with the CAP's focus on ending the use of fossil energy in land uses incompatible with long-term climate objectives.

Summary of Local Energy Considerations

The Revised Oil Well Ordinance is fully consistent with and supported by local energy and climate policy. By phasing out oil production uses and prohibiting new oil wells in unincorporated areas, the Project:

- Implements General Plan Goal C/NR 12 and associated policies;
- Aligns with Title 31 and CALGreen's focus on energy-efficient built environments;
- Supports the 2045 CAP's long-term goal of carbon neutrality;
- Enables future land use transitions to renewable-compatible, low-carbon, or energy-neutral uses;
- Advances Countywide planning priorities for public health, sustainability, and environmental justice.

In this context, the Project represents a foundational policy action that aligns local land use regulation with state and regional efforts to decarbonize California's energy system and meet climate goals.

5.6.1.2 Existing Environmental Conditions

This section provides a quantitative and contextual description of the energy systems operating in Los Angeles County and California. The baseline energy conditions, reflecting supply, consumption, and infrastructure in the 2022–2023 period, are established as required by CEQA Guidelines §15125. This framework is used to analyze whether the Revised Oil Well Ordinance (Project) would result in wasteful, inefficient, or unnecessary consumption of energy, or cause significant impacts to energy infrastructure.

Electricity

California is one of the largest electricity consumers in the nation but is also a leader in energy efficiency. According to the U.S. Energy Information Administration (EIA), California's total electricity consumption in 2022 was approximately 275,000 gigawatt-hours (GWh). This efficiency is largely driven by state policies like the Title 24 Building Energy Efficiency Standards. In 2021, California's per capita residential electricity use was the second lowest in the U.S., a testament to its mild climate and long-standing commitment to demand-side management.

Southern California Edison (SCE) is the primary electric utility for the unincorporated areas of Los Angeles County. In 2022, SCE's total retail electricity sales were approximately 88,000 GWh. The utility is on a trajectory to decarbonize its supply in line with state mandates. According to SCE's 2022 Power Content Label, 48% of its delivered electricity came from eligible renewable resources, an increase from prior years, with the remainder sourced from large hydroelectric, natural gas, and market purchases.

- Renewable Resources: 48%
    - Solar: 27%
    - Wind: 10%
    - Geothermal: 7%
    - Biomass: 3%
    - Small Hydro: 1%

Los Angeles County's total electricity consumption in 2022 was approximately 45.8 billion kWh (45,800 GWh) for non-residential uses and 23.5 billion kWh (23,500 GWh) for residential uses.

Oil production is an energy-intensive industrial land use. Electricity is required for pumping units (jack pumps), fluid injection, lighting, control systems, and vapor recovery equipment. The energy intensity varies significantly based on the extraction method; for instance, wells using enhanced oil recovery (EOR) techniques like water or steam flooding consume substantially more energy than conventional wells. While an average conventional well might use 50-60 kWh per day, this figure can be several times higher for more complex operations.

Collectively, the oil and gas extraction sector (NAICS 211) in California consumed over 8,000 GWh of electricity in 2022, making it one of the most electricity-intensive industries in the state. The phase-out of oil production under the Project will therefore directly reduce this high-intensity, non-residential electricity demand, contributing a net positive impact by freeing up grid capacity and reducing the energy footprint of local land uses.

Natural Gas

California consumed approximately 2.1 trillion cubic feet (Tcf) of natural gas in 2022. About 90% of this supply is imported. While natural gas remains a key fuel for power generation, industrial processes, and building heating, its role is projected to decline. The Southern California Gas Company (SoCalGas), the primary provider for Los Angeles County, forecasts a gradual decrease

in demand due to building electrification mandates and improvements in energy efficiency. In 2022, SoCalGas delivered approximately 750 billion cubic feet of natural gas across its service territory.

Within oil and gas operations, natural gas is a primary fuel source. Its uses include:

- Powering internal combustion engines for pumpjacks and compressors.
- Generating steam for Enhanced Oil Recovery (EOR), a common practice in mature California fields to extract heavier crude oil. This is by far the most energy-intensive use.
- Process and space heating at separation and processing facilities.

The Project's phase-out of oil production will eliminate this on-site consumption of natural gas, a fossil fuel that contributes to both regional air pollution and greenhouse gas emissions. This aligns directly with state and local decarbonization goals by removing a significant source of industrial fossil fuel demand.

Petroleum

Petroleum is the dominant energy source for California's transportation sector. In 2022, the state consumed approximately 575 million barrels of petroleum products, with transportation accounting for over 85% of this total. This equates to a daily consumption of about 1.57 million barrels.

Unincorporated Los Angeles County contains numerous active oil wells. While the production from these wells constitutes a small fraction of California's total supply (the state produced about 115 million barrels in 2022), it represents a direct source of fossil fuel extraction within a region striving for decarbonization.

The Revised Oil Well Ordinance directly eliminates this local crude oil production. This action has two key energy implications:

- Reduces Supply-Side Energy Demand: It ceases the energy-intensive activities of extraction, processing, and transportation (via pipeline or truck) of crude oil, thereby reducing the associated consumption of electricity, natural gas, and diesel fuel.
- Aligns with State Decommissioning Goals: The phase-out of local production is consistent with the broader state policy trajectory aimed at reducing in-state fossil fuel dependency and managing a deliberate and just transition away from an oil-based economy, as signaled by laws like SB 1137 (Setbacks) and AB 1279 (Carbon Neutrality).

The elimination of this local supply source occurs within a policy context designed to aggressively shrink petroleum demand through programs like the Advanced Clean Cars II regulation (mandating 100% ZEV sales by 2035) and the Low Carbon Fuel Standard. The Project is therefore consistent with both the supply-side and demand-side objectives of California's climate and energy policy.

Summary of Existing Energy Conditions

Energy in Los Angeles County is delivered primarily through a decarbonizing electricity grid, a declining natural gas network, and a petroleum transportation system in transition. The Revised Oil Well Ordinance does not introduce new energy demands but results in indirect, long-term reductions in:

- On-site fossil fuel consumption (electricity, natural gas, diesel),
- Upstream and downstream petroleum system energy losses, and
- Emissions associated with oil production energy use.

Existing energy infrastructure is adequate to support decommissioning activities, and future land uses would be heavily regulated by state and local energy codes.

5.6.2 CEQA Thresholds of Significance

In accordance with the County's Environmental Checklist Form (Initial Study) and Appendix G of the State CEQA Guidelines, the applicable thresholds of significance regarding energy are listed below. A project may have a significant impact if it would:

E-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction and operation.

E-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.6.3 Environmental Impacts

5.6.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the programmatic, countywide implementation of decarbonization strategies, including the phase-out of fossil fuels, would result in a less than significant impact regarding the wasteful, inefficient, or unnecessary consumption of energy resources. The Project's decommissioning activities and long-term operational phase-out are entirely consistent with this programmatic finding.

This analysis evaluates the Project's potential energy impacts based on the criteria in Appendix F of the CEQA Guidelines. The Project, a regulatory ordinance to phase out oil and gas production, does not involve a specific development proposal. Therefore, this analysis focuses on the reasonably foreseeable direct and indirect physical changes resulting from the ordinance's implementation. It quantifies the net change in energy consumption by comparing the short-term

energy required for decommissioning against the permanent, long-term energy reductions from ceasing oil and gas operations.

This methodology does not speculate on the energy impacts of potential future development on remediated sites. Any such future projects would be subject to independent, project-level CEQA review, including a detailed analysis of their specific energy demands.

Analysis of Short-Term Energy Consumption (Decommissioning)

The short-term energy use is primarily diesel fuel consumed by heavy-duty equipment and trucks during well plugging, facility demolition, and site restoration. A "first principles" approach, grounded in projected activity levels and equipment-specific fuel consumption rates, was used.

- Off-Road Equipment Fuel Consumption: The analysis compiled a representative fleet of heavy equipment required for decommissioning activities, including workover rigs, cranes, excavators, loaders, water trucks, and generators.
    - Activity Data: The total number of operational hours for each equipment type was estimated by multiplying the number of wells to be decommissioned by typical timelines required for each phase (well plugging, infrastructure removal, grading).
    - Fuel Consumption Factors: Equipment-specific fuel consumption rates (gallons per hour) were derived from the CARB OFFROAD2021 model's emission factor database and supplemented with manufacturer specifications to ensure accuracy for the anticipated equipment fleet. Total fuel consumption is the sum of fuel used by each piece of equipment over the full duration of the decommissioning program.

- On-Road Vehicle Fuel Consumption: This component quantifies fuel used by haul trucks and worker vehicles.
    - Truck Fuel: This includes fuel for trucks transporting demolition debris to designated landfills, potentially contaminated soil to licensed disposal facilities, and cement for well plugging. The total number of truck trips was calculated based on estimated debris volumes and truck capacities. Total Vehicle Miles Traveled (VMT) were derived from representative trip lengths to appropriate facilities. Fuel consumption was then calculated using VMT and average fuel economy factors (miles per gallon) for heavy-duty diesel trucks from the U.S. Environmental Protection Agency's (EPA) EMFAC2021 model.
    - Worker Vehicle Fuel: Commute-related fuel use was estimated based on the projected number of workers, average commute distances within Los Angeles County, and average fuel economy for light-duty vehicles.

Analysis of Long-Term Energy Effects (Cessation of Operations)

The permanent effect of the Project is a net reduction in energy consumption resulting from the termination of all oil and gas extraction and processing activities.

- Electricity Savings: This is the most significant long-term benefit. Baseline electricity consumption was estimated using a multi-source approach for maximum accuracy:
- Production-Based Intensity: The primary method used data from the California Energy Commission (CEC) and Lawrence Berkeley National Laboratory (LBNL) on the average electricity intensity of California oil production (measured in kWh per barrel of oil). This factor was applied to the most

recent five-year average annual production data for the subject wells, obtained from the CalGEM WellSTAR database.

- Direct Data (Where Available): For any larger production sites subject to GHG reporting under CARB's Mandatory Reporting Regulation (MRR), publicly available reports were reviewed to identify directly reported electricity consumption, providing a more precise baseline for those facilities.
- Natural Gas Savings: The analysis accounts for the elimination of on-site natural gas combustion used for engines, heaters, and steam generation in enhanced oil recovery. This was quantified using data from CalGEM records and, where applicable, MRR reports, which specify fuel consumption.
- Elimination of Extracted Fossil Fuel Energy: The Project will permanently halt the extraction of crude oil and associated natural gas. The average annual production volume from the past five years (per CalGEM data) was converted to British Thermal Units (BTUs) to quantify the total energy content of the fossil fuels that will remain in the ground. This calculation is provided for informational purposes to contextualize the magnitude of the prevented fossil fuel extraction, consistent with the disclosure goals of CEQA.

5.6.3.2 Proposed Project Characteristics

The Project is a regulatory action designed to alter land use by prohibiting new oil and gas production and phasing out existing operations. Its characteristics directly influence long-term energy consumption patterns in the unincorporated areas. The primary project characteristics relevant to the energy analysis are detailed below.

Prohibition of New Oil and Gas Development

The ordinance's immediate prohibition on the establishment of any new oil and gas wells or production facilities is a key project feature. This action prevents the introduction of new, long-term, energy-intensive industrial operations. By averting the energy consumption associated with the construction and operation of future wells, this prohibition results in a permanent "avoided energy demand" for electricity, natural gas, and diesel fuel relative to the existing baseline, where such development could otherwise occur.

Mandatory Cessation and Decommissioning of Existing Operations

The Project deems existing oil and gas facilities to be nonconforming uses and requires their complete cessation and decommissioning at the end of a 20-year amortization period pursuant to the Project's built-in mandates (PDF-LU-1: Decommissioning and Site Restoration Mandate, and PDF-LU-2: Decommissioning and Infrastructure Removal). This creates a direct, long-term reduction in existing energy demand. The primary effects are:

- Elimination of Operational Electricity Demand: The ordinance will permanently eliminate the electricity required to power oil field equipment, such as pumpjacks, compressors, injection pumps, and lighting.
- Elimination of Operational Natural Gas Demand: It will eliminate the on-site combustion of natural gas used for steam generation, engines, and process heating.

- Elimination of Operational Diesel Fuel Demand: It will terminate the consumption of diesel fuel by heavy-duty trucks hauling oil, water, and equipment, as well as by engines on workover rigs and other mobile equipment used for routine maintenance.

Application of New Performance Standards

During the 20-year amortization period, all remaining facilities must comply with a new suite of mandatory performance standards that have energy implications.

- Lighting Standards (PDF-AE-3): The requirement that all lighting be minimal, shielded, and directed downward will reduce wasteful electricity consumption from inefficient or unnecessary site illumination during the phase-out period.

Promotion of Energy-Efficient Future Land Uses

By mandating the full remediation and restoration of former oil sites, the Project facilitates their potential future reuse. While this EIR does not analyze specific future projects, any subsequent development would be legally required to comply with all applicable energy regulations at the time of its proposal. This includes the state's Title 24 Building Energy Efficiency Standards and the CALGreen Code, which mandate high levels of energy efficiency, all-electric readiness for new construction, and installation of electric vehicle charging infrastructure. This ensures that the long-term land use transition guided by the Project will align with state and local goals for an energy-efficient, electrified building stock.

5.6.3.3 Impact Analysis

Impact 5.6-1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction and operation? [Threshold E-1]

Less than Significant Impact.

The Project would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during either its short-term decommissioning activities or its long-term operational phase. The Project's short-term energy use is a necessary and temporary expenditure to achieve the permanent environmental benefits of ceasing oil and gas production. The long-term effect of the Project is a substantial net reduction in energy consumption.

Short-Term Energy Consumption (Decommissioning Phase)

Decommissioning activities—including well plugging, demolition of facilities, and site restoration—will require a temporary, short-term expenditure of energy. As detailed in the methodology, this energy will be consumed primarily as diesel fuel for heavy off-road equipment (e.g., workover rigs, excavators) and on-road haul trucks. This consumption of energy is not considered wasteful, inefficient, or unnecessary for the following reasons:

- Necessary for Environmental Protection: The energy consumed during decommissioning is a necessary expenditure to achieve the Project's primary objectives of protecting public health and the environment by ensuring wells are properly plugged to prevent leaks, contamination is remediated, and sites are safely restored. This is a required action under both the proposed ordinance and state law, not a wasteful or optional activity.
- Finite and Temporary: The energy use at each site is temporary, lasting only for the duration of the decommissioning work. Once restoration is complete, this energy demand ceases permanently.
- Regulated for Efficiency: Decommissioning activities will be subject to stringent state regulations, including the California Air Resources Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation, which mandates the turnover of older, inefficient engines in favor of modern, high-tier, fuel-efficient equipment. This existing regulatory framework ensures that the necessary work is performed efficiently, minimizing unnecessary fuel consumption.

Therefore, the short-term energy consumption required for decommissioning is a necessary component of achieving the Project's environmental goals and is managed for efficiency. The impact is less than significant.

Long-Term Energy Effects (Operational Phase)

The long-term "operation" of the Project is the permanent cessation of oil and gas extraction activities. The Project's primary operational effect is a substantial and permanent reduction in energy consumption across the unincorporated areas. By halting oil and gas production, the Project eliminates the associated baseline energy demands, including:

- Electricity: The significant, ongoing electricity demand required to power pumpjacks, compressors, injection pumps, processing facilities, and site lighting will be permanently eliminated.
- Natural Gas: The on-site combustion of natural gas for steam generation, process heat, and powering engines will be terminated.
- Diesel Fuel: The routine consumption of diesel fuel for heavy trucks transporting crude oil and water, as well as for vehicles used in daily maintenance, will end.

This permanent reduction in the consumption of both electricity and fossil fuels is not wasteful or inefficient; to the contrary, it represents a significant energy conservation benefit. The Project's long-term operational characteristic is a net positive impact on energy resources.

Conclusion

While the Project requires a temporary, short-term expenditure of fuel for decommissioning, this use is necessary, finite, and regulated for efficiency. This temporary consumption is vastly outweighed by the permanent, long-term reduction in electricity and fossil fuel use from halting all oil and gas production activities. The Project's net effect is a substantial decrease in energy consumption. Consistent with the programmatic findings of the CAP PEIR, the Project will not result in a wasteful, inefficient, or unnecessary consumption of energy resources, and therefore the impact is less than significant.

Impact 5.6-2: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency? [Threshold E-2]

No Impact.

The Project does not conflict with or obstruct any state or local plan related to renewable energy or energy efficiency. On the contrary, the Project is a direct implementation of key local energy and climate plans and is highly consistent with the goals of state-level plans. By mandating the phase-out of fossil fuel extraction, the Project directly supports the transition to a decarbonized energy system.

Consistency with State Plans

The Project is not only consistent with but also directly implements and advances the primary objectives of California's foundational energy, climate, and public health policies. The phase-out of local oil and gas production aligns with a suite of legislative and regulatory mandates aimed at decarbonizing the state's economy and protecting its communities.

- Renewable Electricity Goals (RPS & SB 100): The state's Renewables Portfolio Standard (RPS) program, which culminates in the goals of SB 100, requires a transition to 100% zero-carbon electricity by 2045. Oil and gas extraction is an energy-intensive industry that creates significant, localized electricity demand. By eliminating this demand, the Project reduces the overall load on the grid, making it easier and more efficient to meet statewide demand with renewable and zero-carbon resources. This action directly supports the goals of SB 100.
- Climate Neutrality Mandate (AB 32, SB 32, and AB 1279): The Project is a direct local implementation of the state's GHG reduction framework. This framework began with AB 32 and SB 32 and is now legally codified by AB 1279 (The California Climate Crisis Act), which mandates statewide carbon neutrality by 2045. CARB's 2022 Climate Change Scoping Plan, the official strategy to meet this goal, explicitly identifies a managed decline of in-state fossil fuel production as a core pillar of its strategy. The Project, by prohibiting new drilling and phasing out existing production, is a tangible action that fulfills the Scoping Plan's call for local government to facilitate this transition.
- Transportation Sector Decarbonization (ACC II, ACT, LCFS): California has adopted a world-leading suite of regulations to eliminate demand for petroleum in the transportation sector. These include the Advanced Clean Cars II rule, which mandates 100% of new passenger vehicle sales be zero-emission by 2035, and the Advanced Clean Trucks regulation, which sets aggressive targets for zero-emission truck sales. The Low Carbon Fuel Standard (LCFS) further requires a steady reduction in the carbon intensity of all transportation fuels sold in the state. The Project perfectly complements these demand-side regulations. While state policy systematically eliminates the demand for gasoline and diesel, the Project addresses the supply side by phasing out the local extraction of crude oil, the primary feedstock for those fuels. This creates a consistent and mutually reinforcing policy signal.

Consistency with Local Plans

The Project is a direct response to, and a primary implementation mechanism for, the County's own adopted energy, climate, and sustainability plans. It is not only consistent with these plans but is, in many cases, the specific action called for to achieve their goals.

- Los Angeles County General Plan: The Project includes a General Plan Amendment specifically to ensure internal consistency between the County's primary policy document and the proposed ordinance. The amendments to the Land Use, Conservation and Natural Resources, and Safety Elements resolve potential conflicts with older policies that may have supported mineral extraction . By explicitly prohibiting new oil operations and establishing a clear policy for phasing out existing ones, the Project aligns the County's foundational planning document with its current public health and environmental priorities.
- 2045 Climate Action Plan (CAP): The Project is a cornerstone of the County's CAP. It directly and fully implements Measure ES-1, which explicitly calls for the County to "develop a sunset strategy and phase out all oil and gas operations in unincorporated areas". Therefore, the Project is not merely consistent with the CAP but is the essential and specific action required for its successful implementation.
- OurCounty Sustainability Plan: The Project strongly supports and implements multiple goals and actions of the OurCounty plan. It is a key action for achieving Goal 1 ("A fossil fuel-free LA County") by eliminating local supply; Goal 2 ("Healthy and safe communities") by removing industrial hazards from neighborhoods; Action 2 ("Expand setbacks for oil operations from sensitive uses") by taking a comprehensive phase-out approach; Action 3 ("Develop a closure plan for abandoned and idled wells") by mandating decommissioning; and Action 84 ("Collaborate on a regional sunset strategy"). The Project is a clear fulfillment of the plan's vision.
- Future Land Use and Energy Efficiency: The Project ensures that any future development on restored oil sites will adhere to the highest energy efficiency standards. All subsequent projects will be subject to the mandatory requirements of California's Title 24 Building Energy Efficiency Standards and the County's Green Building Standards Code. These codes require advanced energy efficiency measures, all-electric readiness, and electric vehicle charging infrastructure, ensuring that the long-term land use transition contributes positively to regional energy conservation goals.

Conclusion

The Project is fundamentally aligned with state and local plans for renewable energy and energy efficiency. It is a direct implementation of adopted County policy aimed at phasing out fossil fuels and directly supports the state's long-term decarbonization mandates. It creates no conflict and instead serves as a model for local implementation of regional sustainability goals. Therefore, there is no impact.

5.6.4 Cumulative Impacts

This section analyzes the Project's potential to contribute to cumulative impacts on energy resources. A cumulative impact is defined in CEQA Guidelines Section 15355 as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The analysis considers whether the Project's incremental

energy impacts, when combined with those of other past, present, and reasonably foreseeable future projects, would be cumulatively considerable.

Cumulative Conditions in Los Angeles County

The geographic scope for the analysis of cumulative energy impacts is the State of California. Energy markets, electricity grids, and climate policies operate on a statewide and even broader basis. The cumulative context is defined by a powerful, long-term trend, driven by state legislation and regulations, away from fossil fuel consumption and toward energy efficiency and renewable energy.

This trend is established by the state and local plans discussed in Section 5.6.3.3, including:

- Statewide mandates for 100% zero-carbon electricity (SB 100) and economy-wide carbon neutrality (AB 1279).
- Aggressive regulations to phase out gasoline and diesel vehicles (Advanced Clean Cars II and Advanced Clean Trucks regulations).
- Local and regional actions by other jurisdictions to promote building electrification, expand public transit, and restrict fossil fuel infrastructure.

The cumulative condition is one of a massive, planned transition of the entire state energy system. Within this context, other reasonably foreseeable projects include ongoing renewable energy development (solar, wind, geothermal), grid-scale battery storage projects, transportation electrification infrastructure, and similar local government actions to phase out fossil fuel uses.

Project Contribution to Cumulative Impacts

The Project's incremental impact is not cumulatively considerable. In fact, the Project's contribution to the cumulative energy picture is beneficial.

- Contribution to Reduced Energy Consumption: The Project's primary effect is the permanent elimination of an energy-intensive industrial land use. By halting the consumption of electricity, natural gas, and diesel fuel associated with oil extraction, the Project contributes directly and positively to the statewide trend of reducing fossil fuel energy demand. When combined with other projects and policies aimed at energy conservation, the Project's effect is to help achieve, not hinder, regional and state energy reduction goals. While the Project may indirectly result in increased marine fuel consumption from an estimated 12 to 24 additional marine tanker trips per year to replace the displaced local oil supply (as analyzed in Section 5.3, Air Quality), this indirect energy use is negligible in the context of the massive global marine shipping network and is entirely outweighed by the permanent elimination of the energy-intensive local extraction and processing operations.
- Consistency with Cumulative Energy Plans: As established in Impact 5.6-2, the Project is highly consistent with all applicable state and local plans for renewable energy and energy efficiency. It is a direct implementation of the County's CAP and OurCounty Sustainability Plan and aligns perfectly with the state's goals for decarbonization. Therefore, its contribution to the cumulative trend is one of policy alignment and support, not conflict or obstruction.

The short-term energy required for decommissioning is minor in the context of regional and statewide energy consumption and is a necessary expenditure to achieve the permanent beneficial impact. This temporary use of energy does not create a considerable contribution to any cumulative adverse impact.

The cumulative context for energy is a statewide transition toward greater efficiency and renewable resources, driven by a comprehensive framework of plans and regulations. The Project's incremental effect is to reduce fossil fuel energy consumption and directly implement the goals of these plans. Therefore, the Project's contribution is not cumulatively considerable, and the cumulative impact on energy resources is less than significant.

5.6.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to energy resources resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project's primary long-term effect is a substantial and permanent beneficial reduction in energy consumption. Any temporary, short-term energy use required for the decommissioning of existing oil production facilities is a necessary expenditure managed for efficiency, and impacts are minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and local fuel-efficiency and fleet regulations, as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.6.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to energy resources. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project—specifically PDF-LU-1 (Decommissioning and Site Restoration Mandate) and PDF-LU-2 (Decommissioning and Infrastructure Removal), which mandate the permanent cessation of operational energy use—as well as mandatory compliance with existing regulatory frameworks. Because the Project does not result in significant impacts to energy resources, no CEQA mitigation measures are necessary.

5.6.7 Level of Significance After Mitigation

The Project's impacts related to energy resources were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.6.8 References

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CHAPTER 5.7 GEOLOGY AND SOILS

The Project is a regulatory action that prohibits new oil and gas production and mandates the decommissioning and restoration of all existing well sites. The analysis therefore focuses on whether these required physical activities could:

- Expose people or structures to significant risk from seismic events, including surface fault rupture, strong ground shaking, or liquefaction.
- Create or contribute to geologic instability, such as landslides or operational subsidence.
- Cause substantial soil erosion or the loss of topsoil.
- Result in the destruction of unique paleontological resources during excavation and grading.

Pursuant to the CEQA Guidelines and the General Plan, which designates oil and gas deposits as a mineral resource, the separate issue of the Project's effect on the loss of availability of those resources is addressed in detail in Section 5.12, Mineral Resources, of this EIR and is not discussed further in this section.

The geology of the Project Area is defined by the active tectonic environment of Southern California and the presence of fossil fuel deposits within deep sedimentary basins. Many existing oil fields are co-located with active fault zones, areas susceptible to landslides, and geologic formations known to be rich in scientifically significant fossils. Furthermore, decades of historical oil production have resulted in the potential for ground subsidence and soil contamination. The following sections evaluate the Project's interaction with these existing physical conditions.

The County received comments regarding the need to protect cultural resources, including potential archaeological and historical sites. As noted in Table 2-1: Summary of Scoping Comments Received, commenters, including the City of Culver City, expressed concern that ground-disturbing activities associated with the project could unearth or damage previously undiscovered paleontological resources. The analysis in this chapter is responsive to these comments and evaluates the potential for the project to impact these resources.

5.7.1 Environmental Setting

5.7.1.1 Regulatory Setting

Federal Regulations

Federal laws and regulations establish a framework for the protection of geologic, soil, and paleontological resources, primarily on lands under federal jurisdiction. Although the Revised Oil

Well Ordinance is a local regulatory action that does not involve federal lands or approvals, federal statutes provide important context for resource management and may be relevant to future site-specific activities that could require federal permits.

Paleontological Resources Preservation Act (PRPA)

The Paleontological Resources Preservation Act (PRPA) protects scientifically significant paleontological resources on federal land and promotes inventory and monitoring programs. While the Revised Oil Well Ordinance applies to unincorporated County areas and not federal lands, the regulation is relevant as a benchmark for paleontological resource sensitivity. The standards established under the PRPA inform the treatment protocols for any potential future discovery of fossils during the well removal, site grading, or restoration activities prompted by the Project. Although not legally binding on County projects, these standards are instructive and commonly referenced in CEQA mitigation programs. As noted in the Cultural Resources section of this EIR and in accordance with current CEQA Guidelines, paleontological resources are discussed in this section.

State Regulations

The most relevant state laws that regulate geology and soils in the Project Area are the Alquist-Priolo
Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and the California Building Code, each of which is described below.

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures used for human occupancy.[1] The main purpose of the Act is to prevent the construction of buildings used for human occupancy on top of the traces of active faults. Although the Act addresses the hazards associated with surface-fault rupture, it does not address other earthquake-related hazards, such as seismically induced ground shaking, liquefaction, or landslides.[2]

The law requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones) around the surface traces of active faults, and to publish appropriate maps that depict these zones.[3] The maps are then distributed to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. In general, construction within 50 feet of an active fault trace requires a fault investigation prior to issuing permits.

[1] Originally titled the Alquist-Priolo Special Studies Zones Act until renamed in 1993, Public Resources Code Division 2, Chapter 7.5, Section 2621.

[2]California Geological Survey – Seismic Hazards Program, Alquist-Priolo Earthquake Fault Zones, http://www.conservation.ca.gov/cgs/alquist-priolo, accessed on December 2, 2024.

[3] Earthquake Fault Zones are regulatory zones around active faults. The zones vary in width, but average about one-fourth mile wide. http://www.conservation.ca.gov/cgs/alquist-priolo, accessed on December 2, 2024.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was passed in 1990. It addresses earthquake hazards other than surface fault rupture, including liquefaction and seismically induced landslides.[4] Under this Act, seismic-hazard zones have been mapped by the State Geologist to assist local governments in land use planning. The Act states that "it is necessary to identify and map seismic-hazard zones in order for cities and counties to adequately prepare the safety element of their general plans and to encourage land-use management policies and regulations to reduce and mitigate those hazards to protect public health and safety."[5] Section 2697(a) of the Act states that "cities and counties shall require, prior to the approval of a project located in a seismic-hazard zone, a geotechnical report defining and delineating any seismic hazard."[6]

Surface Mining and Reclamation Act

The California Geological Survey (CGS) provides geologic expertise and information about California's diverse non-fuel mineral resources. As required by the Surface Mining and Reclamation Act (SMARA) of 1975, the State Geologist classifies these resources in an effort to locate economically significant mineral deposits and potential areas of deposits based upon scientific data. Information relating to California's nonfuel resources, naturally occurring mineral hazards, and active and historic mining activities are collected to classify land under the Mineral Resources and Mineral Hazards Mapping Program. To date, the CGS has completed 97 mineral land classification studies that cover about 34 percent of the state. Of these, only 32 classification studies (covering approximately 25 percent of the state) include the resource areas that provide construction aggregate to over 90 percent of California's population. Construction aggregate is California's primary mineral resource. Please refer to *Section 5.12, Mineral Resources*, for a complete discussion of SMARA and the mineral resources located within the Project Area.

California Building Code

The state regulations protecting structures from geo-seismic hazards are contained in the California Building Code (CBC) (24 CCR, Part 2), which is updated on a triennial basis. These regulations apply to public and private buildings in the state. The 2022 CBC, effective January 1, 2023, is based on the current (2021) International Building Code and enhances the sections dealing with existing and new structures. Many of the recent CBC and IBC updates are related to enhanced fire-safety measures; however, changes set forth in the 2019 CBC requiring seismic-resistant construction design to meet more stringent technical standards have been retained in the 2022 CBC.

[4]California Geological Survey – Seismic Hazards Program, Alquist-Priolo Earthquake Fault Zones, http://www.conservation.ca.gov/cgs/alquist-priolo, accessed on December 2, 2024.

[5] California Public Resources Code, Division 2, Chapter 7.8, Section 2691(c).

[6] California Public Resources Code, Division 2, Chapter 7.8, Section 2697(a).

Chapters 16 and 16A of the 2022 CBC include structural design requirements governing seismically resistant construction, including (but not limited to) factors and coefficients used to establish seismic site class and seismic occupancy category for the soil/rock at the building location and the proposed building design. Chapters 18 and 18A include (but are not limited to) the requirements for foundation and soil investigations (Sections 1803 and 1803A); excavation, grading, and fill (Sections 1804 and 1804A); damp-proofing and water-proofing (Sections 1805 and 1805A); allowable load-bearing values of soils (Sections 1806 and 1806A); the design of foundation walls, retaining walls, embedded posts and poles (Sections 1807 and 1807A), and foundations (Sections 1808 and 1808A); and design of shallow foundations (Sections 1809 and 1809A) and deep foundations (Sections 1810 and 1810A). Chapter 33 of the 2022 CBC includes (but is not limited to) requirements for safeguards at work sites to ensure stable excavations and cut or fill slopes (Section 3304).

California Division of Occupational Safety and Health

The Division of Occupational Safety and Health, better known as Cal/OSHA, protects and improves the health and safety of working men and women in California. Cal/OSHA Regulations (Title 8 of the California Code of Regulations, Chapter 4, Division of Industrial Safety, Subchapter 4, Construction Safety Orders, Article 6, Excavations, Section 1541.1, Requirements for Protective Systems), includes protections to avoid excavation cave-ins, design of sloping and benching systems, and design of support systems.

Construction General Permit (State Water Resources Control Board Order 2009-0009-DWQ, as Amended)

For stormwater discharges associated with construction activity in the state, the State Water Resources Control Board has adopted the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit) to avoid and minimize water quality impacts attributable to such activities. In accordance with National Pollutant Discharge Elimination System (NPDES) Phase I Permit requirements, the Construction General Permit applies to all projects in which construction activity disturbs one acre or more of soil. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, such as stockpiling and excavation. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan (SWPPP), which would include and specify water quality best management practices (BMPs) designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving waters. Routine inspection of all BMPs is required under the provisions of the Construction General Permit, and the SWPPP must be prepared and implemented by qualified individuals as defined by the State Water Resources Control Board.

Local Regulations

Los Angeles County Code

In addition to the adoption of the CBC by reference, the Los Angeles County Code also contains rules and regulations that govern activities that could result in soil erosion or slope instability. These rules and regulations are organized as Title 26, Appendix J–Grading, where provisions for excavation, grading, and earthwork construction have been established; permitting procedures are set forth; and plan approval and grading inspection protocols and procedures have been identified.[7] Section J110 of this chapter also contains provisions for construction-related erosion control, including the preparation of cut-and-fill slopes and the implementation of erosion control measures such as check dams, cribbing, riprap, or other devices or methods.

The ordinances also include seismic safety requirements for certain building types, such as older concrete tilt-up buildings and unreinforced masonry bearing wall buildings (refer to Title 26, Chapters 95 and 96). The stated goal of these ordinances is to promote public safety and welfare by reducing the risk of death or injury that could result from earthquake damage to certain types of older buildings during moderate or strong earthquakes. Based on the findings of required structural analysis, deficient buildings may need to be strengthened or demolished.

Existing Conditions

This section presents a discussion of the existing geological conditions and soil resources within the Project Area as well as their regional setting.

Topographic Setting

U.S. Geological Survey's (USGS) Los Angeles, Long Beach, San Bernardino, and Santa Ana 1:250,000 scale topographic map sheets provide broad topographic information for the County. The Project Area's topography is highly varied, ranging from the flat, low-lying coastal plains of the Los Angeles Basin to the steep, rolling hills of the Puente Hills and Baldwin Hills, and the rugged terrain of the Santa Susana, Santa Monica, and San Gabriel Mountains. This diverse landscape includes coastal plains, alluvial fans, foothills, and prominent mountain ranges. Elevations range from near sea level at the coast to over 10,000 feet in the San Gabriel Mountains. Many of the County's oil fields are located within these hillside areas, which are characterized by moderate to steep slopes that can exceed 50 percent.

Geologic Setting

The surficial and bedrock geology underlying the Project Area has been mapped by a variety of agencies and organizations, including the USGS and the California Division of Mines and Geology, now, the California Geological Survey (CGS).

[7] LACounty Code, Title 26, Appendix J–Grading, https://library.municode.com/ca/los_angeles_county/codes/code_of_ordinances, accessed on December 2, 2024.

A significant portion of the Project Area lies in the Transverse Ranges geomorphic province, a band of east-west trending mountains and valleys that generally vary from 30 to 100 miles in width and span roughly 250 miles from Point Arguello on the west to the San Bernardino Mountains on the east.[8] The east-west orientation of this province marks a change from the general northwesterly trends of the Peninsular Ranges Province to the south and the northwesterly grain of the California Coast Ranges and the Great Valley to the north.

In many regards, the Transverse Ranges are an anomaly when compared to the general structural grain of the North American Continent. Although geologically recent tectonic activity (i.e., middle Miocene and younger) accounts for much of the present rock distribution, the distributions of different crystalline basement rocks point to older tectonic episodes. The distinctive physiography and structural geology of the Transverse Ranges province are overprinted on an older pattern of Precambrian through early Cretaceous igneous and metamorphic basement rocks, which generally occur as fault-bounded blocks. Major basement rock boundaries are not only found along the edges of the Transverse Ranges, but they are also encountered within the province. For example, the northwest-trending Verdugo Fault separates the Precambrian to Cretaceous crystalline basement of the San Gabriel Mountains from the Jurassic metamorphic basement of the Santa Monica Mountains.

The bedrock units of the Project Area can be discussed as two groups: 1) basement rocks–early Cretaceous and older, crystalline metamorphic and igneous rocks; and 2) the overlying sequence of late Cretaceous and Tertiary strata. The basement rocks of the San Gabriel Mountains are comprised of Precambrian, Paleozoic, and pre-middle-Cretaceous Mesozoic metamorphic and igneous rocks. These are the oldest rocks in the Project Area, and they appear to represent old continental crust at the west edge of the North American continent.

In the east part of the Los Angeles Basin, and in the Santa Monica Mountains, the basement rocks largely consist of metamorphosed sedimentary and volcanic rocks of Jurassic age that were probably deposited on oceanic crust, and later accreted to the continental margin. The basement rocks of the west part of the Los Angeles Basin also are associated with oceanic crust, although their metamorphic characteristics are suggestive of low-grade metamorphism in a subduction zone.

A sequence of Upper Cretaceous and Tertiary sedimentary and volcanic strata lies unconformably atop the basement rocks discussed above. Regional unconformities of Upper Cretaceous age have been mapped in the Santa Monica Mountains, as well as an unconformity at the base of the Paleogene section in the western Santa Monica Mountains and Simi Hills. The aforementioned sedimentary deposits are dominated by thick sections of marine Miocene- and Pliocene-age sediments in the Los Angeles Basin.

[8] USGS, 2005. Preliminary Geologic Map of the Los Angeles 30´ × 60´ Quadrangle, Southern California, Open-File Report OpenFile Report 2005-1019, Compiled by Robert F. Yerkes and Russell H. Campbell.

Previous mapping has often regarded the Los Angeles Basin boundaries as the extent of middle and upper Miocene marine deposition, so as to include sedimentary rocks found in the Santa Monica Mountains, San Fernando Valley, south edge of the San Gabriel Mountains, San Jose Hills, Puente-Chino Hills, Chino Basin, northern Santa Ana Mountains, San Joaquin Hills, and Palos Verdes Hills.[9] [10]

The Tertiary sedimentary units identified in the San Gabriel and San Fernando Valleys are the Topanga, Puente, Repetto, and Pico Formations, which range in age from Miocene to Pliocene.[11] With one exception, these formations are found underlying the unconsolidated alluvium that forms the chief aquifers in these basins.

The Topanga and Puente Formations are marine deposits of middle and upper Miocene age. They are composed of interbedded siltstones, sandstones, conglomerate, and shale with local volcanic horizons. These formations outcrop in places along the base of the San Gabriel Mountains and in the South Hills, and constitute a major part of the low hills, which form the basin boundary on the east, south, and west.

The Repetto Formation overlies the Topanga and Puente Formations in parts of the Repetto, Merced, Puente, and San Jose Hills. The sedimentary beds that form the Repetto Formation were laid down during early Pliocene time in the last and most extensive of the seas that invaded the San Gabriel Valley toward the end of the Tertiary period. A typical section of the Repetto Formation, more than 2,000 feet thick, is exposed in the Repetto Hills, and consists of micaceous siltstone with lesser amounts of sandstone and conglomerate. Other outcrops of the Repetto Formation are found in the Puente and San Jose Hills.

The Pico Formation was deposited in shallow water during the late Pliocene Epoch as the sea receded from the area which now constitutes the San Gabriel Valley. It crops out in the Repetto, Merced, Puente, and San Jose Hills, where it overlies the lower Pliocene Repetto Formation. Small isolated outcrops of the Pico Formation are also exposed low on the south flank of the San Gabriel Mountains, north of the Santa Fe Dam.

Based on differences in lithology and paleontology, the Pico Formation can be divided into lower and upper members. The lower member consists of greenish-gray micaceous siltstone and fine-to-coarse, light-gray feldspathic sandstone interbedded with claystone and shale. The upper Pico Formation is generally composed of sand, silt, and clay interbedded with marine gravels. Beds of gravel and sand range in thickness from 20 to 100 feet and are locally separated by layers of

[9] USGS, 2006. Geologic Map of the San Bernardino and Santa Ana 30´ x 60´ Quadrangles, Southern California, Open-File Report 2006-1217, Compiled by Douglas M. Morton and Fred K. Miller.

[10] California Department of Water Resources, 1961. Planned Utilization of Ground Water Basins of the Coastal Plain of Los Angeles County, Bulletin 104.

[11] California Department of Water Resources, 1961. Planned Utilization of Ground Water Basins–San Gabriel Basin, Bulletin 104-2.

siltstone and clay. The Pico Formation has been encountered in several oil wells drilled in the Whittier Narrows area north of the Merced Hills.

Geologic Setting

For more than 100 years, the soils in the Project Area have been periodically studied and mapped by various agencies and researchers, including the U.S. Department of Agriculture Natural Resource Conservation Service (formerly, the Soil Conservation Service). Soil surveys of the area have long recognized the diverse soil types and conditions in Los Angeles County. An early 20th century investigation identified as many as 17 different soil types in the region.[12] Most of the soils were comprised of sands, loams, sandy loams, and adobe, whereas granitic gravel was locally noted in soils found close to major drainages or along mountain fronts.

Previous countywide environmental studies have discussed soil types based on three geographic settings: Coastal Lowlands, Central Mountains, and Northern Desert areas.[13] The Coastal Lowlands, which are comprised of the Los Angeles Coastal Plain; the Santa Monica and Verdugo Mountains, the Repetto, San Rafael, Puente, and San Jose Hills; and the San Fernando, San Gabriel, and Santa Clarita Valleys, are reportedly dominated by soils that are generally amenable to urban development. Certain areas near the margins of the coastal plain reportedly pose problems with respect to such development. For example, in the Palos Verdes Hills, corrosive soils and soils with high expansion potential have been identified. Most of the San Gabriel Valley and the central San Fernando Valley are reportedly underlain by soils well-suited for urban development, although in the vicinity of the City of Calabasas, corrosive soils and soils with high expansion potential have been mapped. Portions of the Antelope Valley are reportedly underlain by soils that may be susceptible to hydrocollapse.

In recent years, Public Works has compiled a GIS database for major soil types that have been mapped within the Project Area.[14] The information in that database describes nearly two dozen soil types, including loams; clayey, silty, and sandy loams; clay adobes; and various alluvial and mountain soil types, as shown on Figure 5.7-1. The prevailing soil types in each of the 11 Planning Areas are summarized in the following Table 5.7-1.

[12] USDA Bureau of Soils (now Natural Resource Conservation Service), 1903. Soil Survey of the Los Angeles Area, California, Mesmer, Louis B.

[13] Environmental Systems Research Institute, 1976. Land Capability/Suitability Study Natural Resources Inventory: Capability for Development Considering Interpretations of Soil Conditions" (Variable 22).

[14] Los Angeles County Department of Public Works, Los Angeles County GIS Data Portal, Soil Types, https://egis-lacounty.hub.arcgis.com/search?q=soil%20types, accessed on December 2, 2024.

Figure 5.7- 1 Map of Prominent Soil Types in Los Angeles County

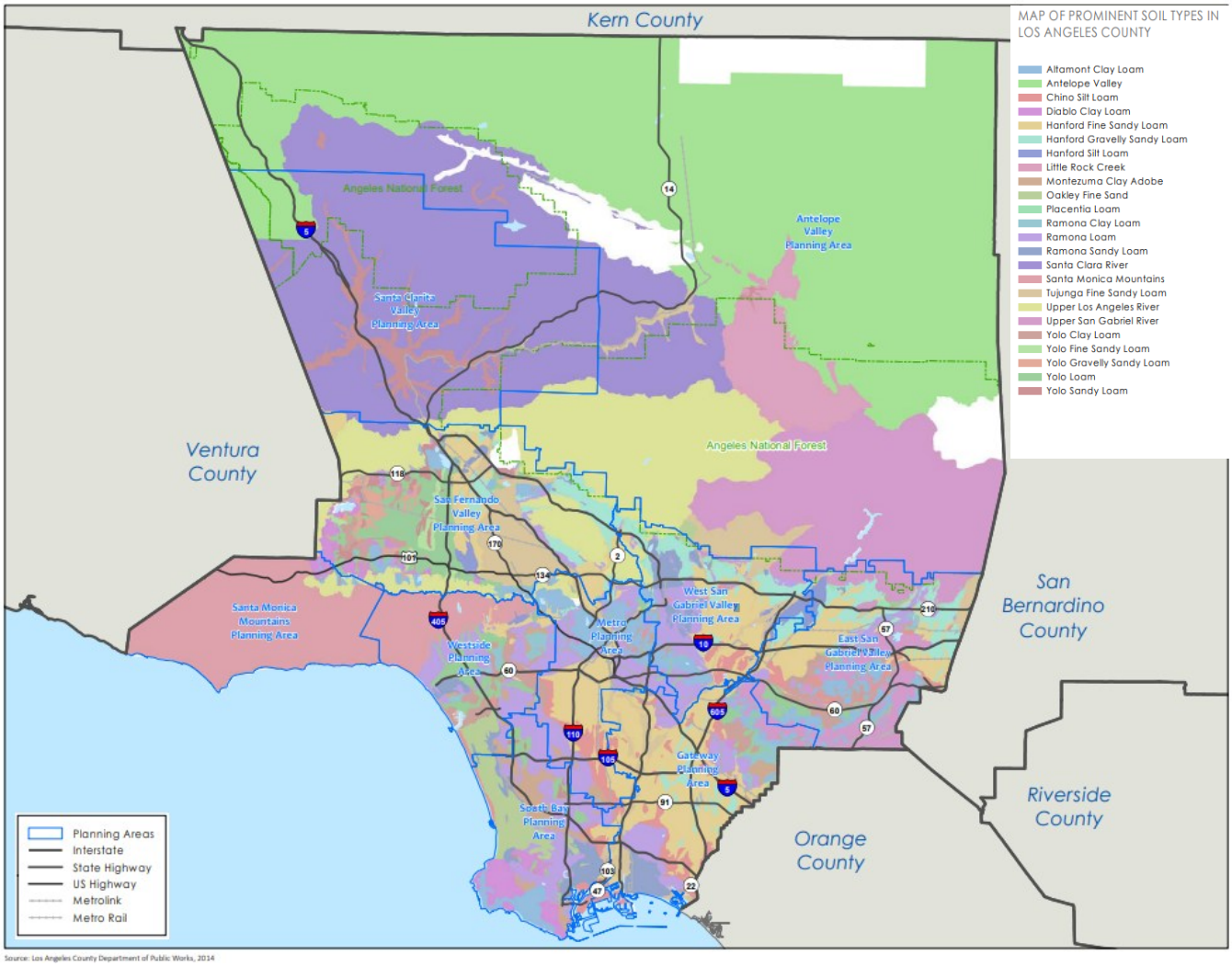


Table 5.7-1 Predominant Soil Types by Planning Area

Planning Area	Predominant Soil Types*
Antelope Valley Planning Area	Antelope Valley Series (predominantly loam, gravelly loam, and sandy loam in area immediately northeast of San Andreas Fault[17])
Coastal Island Planning Area	Loam, clay loam, and gravelly loam, often derived from weathering of parental volcanic bedrock.[18]
East San Gabriel Valley Planning Area	Hanford Fine Sandy Loam Hanford Gravelly Sandy Loam Yolo Clay Loam
Gateway Planning Area	Hanford Fine Sandy Loam Chino Silt Loam
Metro Planning Area	Hanford Fine Sandy Loam Ramona Loam Altamont Clay Loam
San Fernando Valley Planning Area	Yolo Loam Tujunga Fine Sandy Loam Hanford Fine Sandy Loam
Santa Clarita Valley Planning Area	Yolo Sandy Loam Santa Clara River Series
Santa Monica Mountains Planning Area	Santa Monica Mountains Series
South Bay Planning Area	Yolo Loam Montezuma Clay Adobe Oakley Fine Sand
West San Gabriel Valley Planning Area	Hanford Fine Sandy Loam Chino Silt Loam Tujunga Fine Sandy Loam
Westside Planning Area	Ramona Loam Ramona Sandy Loam Yolo Loam

* Source: Los Angeles County Department of Public Works, GIS Data Portal, Soil Types, 2014.

Regional Faulting and Seismic Setting

The Project Area is one of the most seismically active, urban settings in North America.[15] Assessments of the earthquake hazards in California have concluded that catastrophic earthquakes are inevitable in the Los Angeles region.[16] The probability that a large earthquake will occur sometime during the next 30 years along the nearby San Andreas Fault is currently estimated to be 40 percent or greater.[17] Projected losses of billions of dollars and estimated casualties of tens of thousands could surpass any previous natural disaster in the United States. A catastrophic earthquake would severely strain the emergency-response and recovery capabilities of federal, state, and local governments.

From a tectonic perspective, the San Andreas Fault system is a zone of relative motion between the North American and Pacific Plates. The tectonic-driven crustal deformation now taking place in Southern California is dominated by the intersection of the San Andreas and the Transverse Ranges fault systems. The manifestations of this intersection are varied, ranging from the

[15] USGS, 1987. Evaluating Earthquake Hazards in the Los Angeles Region-An Earth-Science Perspective, Professional Paper 1360, J. I. Ziony, Editor.

[16] Federal Emergency Management Agency, 1980. An Assessment of the Consequences and Preparations for a Catastrophic California Earthquake.

[17] Wesson and Wallace, 1985. Predicting the Next Great Earthquake in California: Scientific American, v. 252, no. 2.

considerable topographic relief along the south flank of the San Gabriel Mountains, or in transitory events, such as earthquakes. Although these fault systems are part of a long-term, ongoing tectonic process now more than five million years old, they are currently responding to strain related to motion of the Pacific and North American plates through horizontal slip (aka strike-slip) along the San Andreas Fault system or by vertical (aka thrust) slip on Transverse Ranges faults. Seismic hazards present within Los Angeles County are shown on Figure 5.7-2, *Map of Seismic Hazards Los Angeles County*.

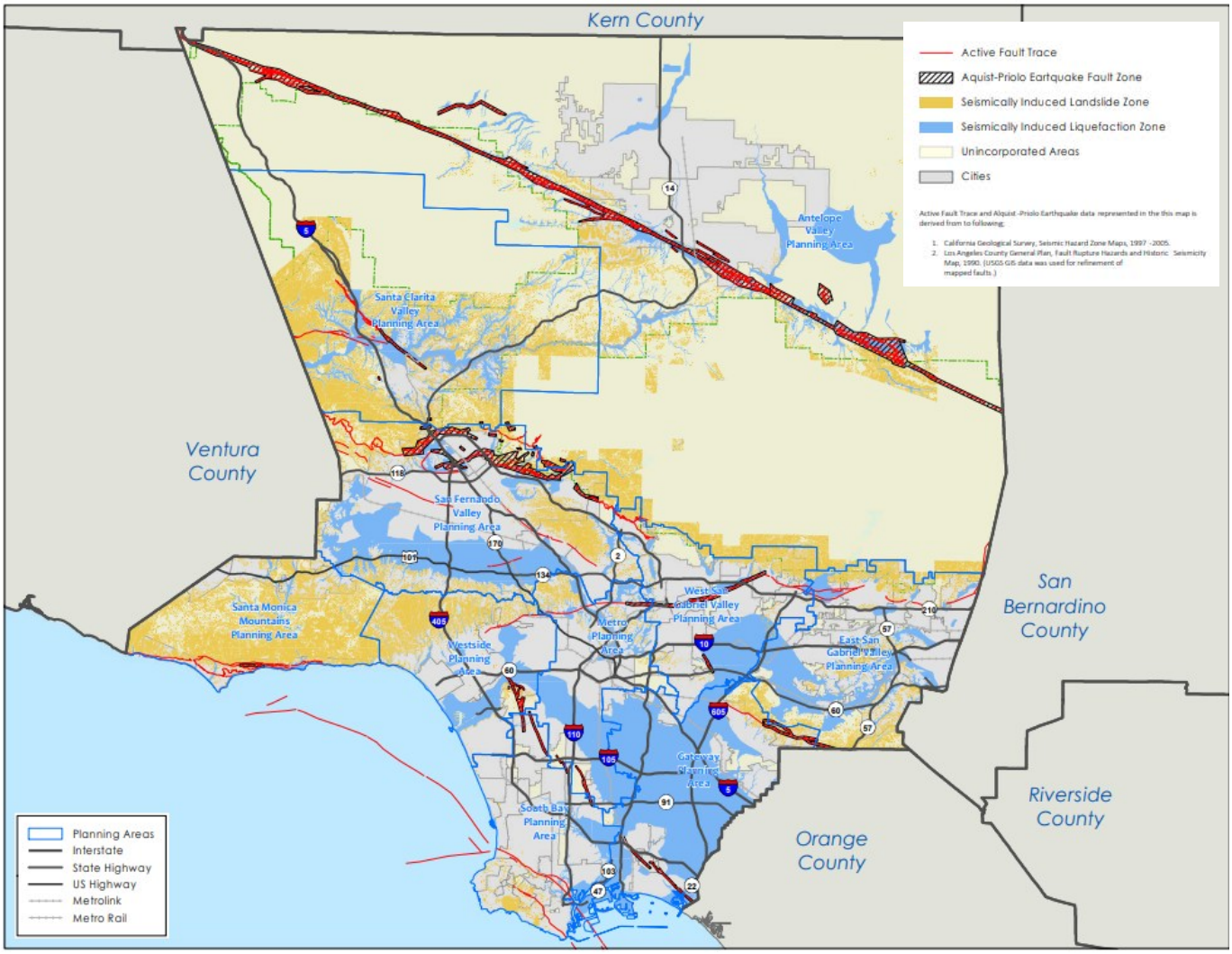
Based on subsurface trenching and exploratory borings, surface observations, geomorphologic/topographic patterns, geophysical data, and other evidence, more than one dozen faults within the Project Area have been classified as “active faults” by the California Geological Survey. By definition, such faults must exhibit evidence of seismic failure within the past 11,000 years. Under the 1972 Alquist-Priolo Earthquake Fault Zoning Act, California law requires the State Geologist to identify such faults, establish protective regulatory zones known as “Earthquake Fault Zones” (or prior to 1991, “Special Studies Zones”) about the traces of these faults, then publish and disseminate maps of these zones. Some of the more significant state-mapped active faults in the Project Area are listed in Table 5.7-2, along with the Planning Areas in which they are located. This table is not intended to be all-inclusive. Instead, its purpose is to highlight prominent earthquake faults that have been associated with significant Los Angeles-area seismic events.

Table 5.7-2 Prominent Active Faults in the Planning Areas

Fault Name	Planning Area Location	Comments
Hollywood Fault	Westside Planning Area Metro Planning Area Santa Monica Mountains Planning Area	Composed of strands that flank the south flank of the Santa Monica Mountains, with a prevailing reverse to reverse-oblique movement. Heretofore not mapped as active, although recent observations during construction north of Hollywood Blvd. have prompted the publication of new draft earthquake fault zone maps.
Newport-Inglewood Fault	Westside Planning Area South Bay Planning Area	Includes Inglewood, Potrero, Avalon-Compton, Cherry Hill, and Reservoir Hill-Seal Beach segments. Predominantly right-lateral or right-oblique movement. Associated with 1933 magnitude (M_W) 6.4 Long Beach Earthquake.
Raymond Fault	West San Gabriel Valley Planning Area	Prevailing reverse and reverse-oblique movement. Associated with 1998 M_W 5.0 Pasadena Earthquake.
San Fernando Fault	San Fernando Valley Planning Area	Composed of Reservoir, Mission Wells, Sylmar, Tujunga, and Lake View segments. Prevailing reverse and left-oblique movement. Associated with 1972 M_W 6.5 San Fernando (Sylmar) Earthquake.
San Gabriel Fault	West San Gabriel Valley Planning Area Santa Clarita Valley Planning Area	Complex range of movement sense/offset, consisting of a zone of north-dipping, en-echelon fault segments.
Sierra Madre Fault System	West San Gabriel Valley Planning Area	Interconnected fault strands that occupy a zone as wide as one kilometer. Prevailing reverse displacement.
San Andreas Fault System	Antelope Valley Planning Area	Traversing the north part of the Project Area and as a tectonic plate boundary, it may represent the single most significant earthquake fault zone in California. Quiescent for many decades, it was the site of the 1857 Fort Tejon Earthquake with an estimated magnitude M_W 7.9 and surface rupture that extended more than 350 kilometers.

Source: Southern California Earthquake Data Center, 2014; US Geological Survey Earthquake Hazards Program, 2014.

Figure 5.7-2 Map of Seismic Hazards in Los Angeles



Seismic Hazards

Active Faults

Slip along a fault may result in one or more geologic effects that can damage or destroy structures and injure their inhabitants. In general, ground shaking and surface fault rupture are the effects of greatest concern when an earthquake occurs along a fault in the Los Angeles region. A related effect, the possible generation of tsunamis by submarine earthquakes, may be of concern to coastal areas. For certain structures such as pipelines, canals, and coastal facilities, the regional scale uplift and subsidence that can result from some large earthquakes could pose a minor hazard.

Seismic records and data, particularly those dating from the mid-20th century, underscore the probability and severity of large earthquakes in the Project Area. Table 5.7-3 summarizes the most significant seismic events from 1930 to the present time. The listed earthquakes are those whose

epicenters/hypocenters lay within the Project Area. Thus, some larger, recent events located outside of Los Angeles County, such as the June 1992 magnitude (Mw) 7.2 Landers Earthquake, have not been included. In total, the listed earthquakes resulted in more than $21 billion in damage and the loss of nearly 250 lives.

Table 5.7-3 Summary of Significant Earthquakes in the Project Area (post-1930)

Seismic Event	Date	Fault	Magnitude (M_w)	Damage/ Casualties
Northridge EQ	January 1994	Northridge Thrust Fault	6.5	$20B/57
Sierra Madre EQ	June 1991	Clamshell-Sawpit Canyon Fault	5.8	$40M/2
Pasadena EQ	December 1988	Raymond Fault	5.0	Minor/none
Whittier Narrows EQ	October 1987	Unnamed blind thrust fault	5.9	$358M/8
Sylmar/San Fernando EQ	February 1971	San Fernando Fault Zone	6.5	$500M/65
Long Beach EQ	March 1933	Newport-Inglewood Fault	6.4	$50M/120

Source: Southern California Earthquake Data Center.

Surface Fault Rupture

Surface fault rupture can occur during significant seismic events. The process generally involves the sudden failure and displacement of the earth's surface along a fault trace or fault zone. The magnitude and geometry of such ground displacement is highly variable. In general, strike-slip faults such as the San Andreas Fault are more likely to produce lateral offsets in the ground surface, with one side of the fault plane or zone "sliding" past the opposing side. Similarly, faults that generally fail under compressional stress, such as thrust or reverse faults, are more prone to vertical offsets in the ground surface. In either case, buildings or other man-made structures that lie atop the fault can experience serious damage or catastrophic failure during a strong earthquake.

Strong Seismic Ground Shaking

An earthquake of moderate to high magnitude generated within the Project Area could cause significant ground shaking within any of the 11 Planning Areas. The exact degree of shaking experienced at a given location would depend on a host of site-specific factors, such as: the magnitude of the seismic event, the duration of the seismic event, the distance from a given site to the zone of rupture (i.e., hypocenter), local site-specific geologic conditions (i.e., nature, thickness, and extent of underlying soil and/or bedrock), and broader, often regional geologic factors such as basin geometry. In general, the severity of seismic ground shaking tends to abate with increasing distance from the event hypocenter. Seismic ground shaking, if sufficiently intense and sustained, can result in significant damage to, or catastrophic failure of buildings or other man-made structures.

Seismically Induced Slope Failure

An earthquake of moderate to high magnitude generated within the Project Area could result in slope failure such as landslides. Although landslides can manifest as a variety of earth movements,

a recent study of earthquake-related slope failures found that the following were the most prevalent (in order of decreasing frequency): 1) rock falls, disrupted soil slides, and rock slides; 2) soil lateral spreads, soil slumps, soil block slides, and soil avalanches; and 3) soil falls, rapid soil flows, and rock slumps. The potential for such slope failure is often highly site-specific, and can be exacerbated where saturated soil/bedrock is present, steep and/or eroded slopes are noted, and evidence of historical slides or slide-prone soil or bedrock types.

Liquefaction

Liquefaction is a process whereby strong seismic shaking causes unconsolidated, water-saturated sediment to temporarily lose strength and behave as a fluid. This process can lead to near-surface or surface ground failure that can result in extensive damage to or catastrophic failure of buildings, roads, utility lines, and other man-made structures. Liquefaction can manifest as lateral ground spreading or flow, localized sand boils (i.e., eruptions of fluidized sediment), or rapid subsidence and an accompanying loss of bearing strength. In order to preliminarily evaluate a region's susceptibility to liquefaction, several factors ought to be considered, including:

- The anticipated intensity and duration of ground shaking.
- The origin, texture, and composition of shallow sediments. In general, cohesionless, fine-grained sediments such as silts or silty sands, or areas of uncompacted or poorly compacted fills are more prone to liquefaction. By contrast, coarser grained, poorly sorted sediments such as coarse sands and gravels are less susceptible to liquefaction. Liquefiable sediments are found in a variety of depositional environments, including bays, estuaries, river floodplains and basins, lakes, and Aeolian deposits such as dunes and loess.
- The presence of shallow groundwater. Saturated sediments are necessary for seismically induced liquefaction to occur. In general, the highest liquefaction susceptibility is found in fine-grained sediments of late Holocene to late Pleistocene age (i.e., 1,000 to 15,000 years before present [B.P.]) in areas where the groundwater is shallower than about 50 feet below ground surface.

The above-referenced geological settings and conditions are not unusual and they are found in many parts of Southern California. A more detailed overview of the state-mapped seismic hazard zones in the 11 Planning Areas is presented in the following Table 5.7-4. In preparing this overview, descriptive terms such as "limited" are intended to provide a very generalized, qualitative way in which the Planning Areas might be compared to one another. Comprehensive, project-specific or site-specific evaluations necessarily require more detailed information, beginning with quadrangle-level maps and ranging to invasive sampling and testing.

Table 5.7-4 Overview of Mapped Seismic Hazards in the Planning Area

Planning Area	Seismic-Induced Landslide Zones	Seismic-Induced Liquefaction Zones
Antelope Valley Planning Area	Limited landslide hazard zones have been identified; most lie in foothills/mountain front areas south of San Andreas Fault.	Several liquefaction hazard zones have been identified. Most are associated with washes/arroyos that drain to Mojave Desert.
Coastal Island Planning Area	Not mapped by CGS.	Not mapped by CGS.
East San Gabriel Valley Planning Area	Several landslide hazard zones have been identified; most lie in foothill areas along south front of San Gabriel Mountains or hilly areas such as the San Jose, Puente, and Whittier Hills.	Several liquefaction hazard zones have been identified. Most are associated with existing drainages and alluvial valleys such as Walnut and San Jose Creeks.
Gateway Planning Area	Limited landslide hazard zones have been identified; most lie in hilly areas such as south flank of the Whittier Hills.	Large liquefaction hazard zones have been identified. The largest are associated with present-day and ancestral San Gabriel and Los Angeles Rivers.
Metro Planning Area	Limited landslide hazard zones have been identified; most lie in hilly areas such as Mount Washington, Silver Lake, and Griffith Park.	Limited liquefaction hazard zones have been identified. Most are associated with present-day and ancestral Los Angeles River.
San Fernando Valley Planning Area	Several landslide hazard zones have been identified; most lie in foothill areas along north front of Santa Monica Mountains, south front of Santa Susana Mountains, or hilly areas such as the Verdugo Mountains.	Large liquefaction hazard zones have been identified. The largest are associated with present-day and ancestral Los Angeles Rivers.
Santa Clarita Valley Planning Area	Numerous landslide hazard zones have been identified; most lie in steep-sloped terrain of the Santa Susana Mountains.	Largest liquefaction hazard zones have been identified. The largest are associated with present-day Santa Clara River and its tributary streams and canyons.
Santa Monica Mountains Planning Area	Numerous landslide hazard zones have been identified; most lie in steep-sloped terrain of the Santa Monica Mountains.	Limited liquefaction hazard zones have been identified. Most are associated with narrow canyons incised in the Santa Monica Mountains.
South Bay Planning Area	Limited landslide hazard zones have been identified; most lie in hilly areas such as the Palos Verdes Hills.	Limited liquefaction hazard zones have been identified. The most prominent lie northeast of the Baldwin Hills.
West San Gabriel Valley Planning Area	Limited landslide hazard zones have been identified; most lie in foothill areas along south front of San Gabriel Mountains or hilly areas such as the San Rafael, Montebello, and Monterey Hills.	Several liquefaction hazard zones have been identified. Most are associated with existing drainages such as Eaton Wash, Arroyo Seco, as well as present-day and ancestral San Gabriel River.
Westside Planning Area	Several landslide hazard zones have been identified; most lie in hilly areas such as the Santa Monica Mountains and Baldwin Hills.	Several liquefaction hazard zones have been identified. Most are associated with present-day and ancestral Ballona Creek.

Source: CA Geological Survey, Seismic Hazard Zonation Program, 2014.

Buildings Prone to Seismic Damage

Earthquake risks are not limited to ground shaking, fault rupture, or liquefaction, but also embrace the damage to inhabited buildings or sensitive, manmade infrastructure. Advances in the field of seismic engineering and strengthened building codes have significantly reduced the potential for catastrophic collapse in newly constructed buildings. Nevertheless, many older buildings were designed and constructed before modern seismic design standards were incorporated into the building code. Certain building types are of particular concern:

- Unreinforced Masonry Buildings: In the late 1800s and early 1900s, unreinforced masonry was the most common type of construction for commercial buildings and multi-story apartments and hotels. These were recognized as a collapse hazard following the 1906 San Francisco Earthquake, the 1925 Santa Barbara Earthquake, and again, in the aftermath of the 1933 Long Beach Earthquake. These buildings are generally recognized as the most susceptible to seismic damage.

- Precast Concrete Tilt-up Buildings: This commercial/industrial building type gained popularity in the late 1950s and 1960s. Extensive damage to concrete tilt-up buildings during the 1971 San Fernando Earthquake revealed the need for seismic reinforcement, such as better anchoring of walls to the roof, floor, and foundation elements, as well as stronger roof diaphragms.

5.7.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

GEO-1 Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

a) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)

b) Strong seismic ground shaking.

c) Seismic-related ground failure, including liquefaction.

d) Landslides.

GEO-2 Result in substantial soil erosion or the loss of topsoil.

GEO-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

GEO-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

GEO-5 Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

GEO-6 Conflict with the Hillside Management Area Ordinance (LA County Code, Title 22, Chapter 22.104).

GEO-7: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

5.7.3 Relevant General Plan Goals and Policies

Following is a list of the policies of the Project that are intended to reduce potentially significant adverse effects concerning geology or soils.

Conservation and Natural Resources Element

- Policy C/NR 11.1: Require mineral resource extraction and production activities and drilling for and production of oil and natural gas to comply with County regulations and state requirements, such as SMARA, and DOGGR regulations.

- Policy C/NR 11.4: Require that mineral resource extraction and production operations as well as activities related to the drilling for and production of oil and natural gas be conducted to protect other natural resources and prevent excessive grading in hillside areas.

- Policy C/NR 13.5: Encourage required grading to be compatible with the existing terrain.

- Policy C/NR 13.8: Manage development in (Hillside Management Areas) HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.

Safety Element

- Policy S 1.1: Discourage development in Seismic Hazard and Alquist-Priolo Earthquake Fault Zones.

- Policy S 1.2: Prohibit construction of structures for human occupancy adjacent to active faults unless a comprehensive fault study that addresses seismic hazard risks and proposes appropriate actions to minimize the risk is approved.

- Policy S 1.3: Require developments to mitigate geotechnical hazards, such as soil instability and landslides, in Hillside Management Areas through siting and development standards.

- Policy S 1.4: Support the retrofitting of unreinforced masonry structures and soft-story buildings to help reduce the risk of structural and human loss due to seismic hazards.

5.7.4 Environmental Impact

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that physical implementation of decarbonization measures involving earth-moving and grading could generate short-term, potentially significant impacts to paleontological resources, but that existing building codes largely mitigate standard geotechnical hazards. Therefore, this programmatic analysis strictly evaluates the incremental short-term impacts of the Project's decommissioning activities. Because these temporary earth-moving activities are governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with existing local and state laws (including the California Building Code, local grading ordinances, and California Public Resources Code Section 5097.5), this analysis focuses on demonstrating how these existing legal frameworks ensure any short-term impacts to geology, soils, and paleontological resources remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The following impact analysis addresses thresholds according to Appendix G of the CEQA Guidelines of significance.

Impact 5.7-1(i): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. [Threshold GEO-1(a)]

Less Than Significant Impact.

The Project Area encompasses numerous active and potentially active faults, and several oil fields are located within Alquist-Priolo Earthquake Fault Zones as delineated by the State Geologist. The purpose of the Alquist-Priolo Earthquake Fault Zoning Act (California Public Resources Code §§ 2621-2630) is to prevent the construction of structures intended for human occupancy on the surface traces of active faults. A structure for human occupancy is defined as one that is expected to have a human occupancy rate of more than 2,000 person-hours per year. The Act requires that before a project can be permitted within a designated zone, a geologic investigation must be conducted by a licensed geologist to demonstrate that proposed buildings would not be constructed across an active fault. If an active fault is identified, a structure for human occupancy cannot be placed over its trace and must be set back, typically a minimum of 50 feet.

The Revised Oil Well Ordinance is a regulatory, policy-level action that does not propose or authorize the construction of any new structures for human occupancy. The reasonably foreseeable physical activities resulting from the project are limited to the decommissioning and removal of existing industrial oil and gas infrastructure and the restoration of those sites. The only human presence associated with these activities would be a temporary construction workforce. This transient presence does not meet the "human occupancy" threshold that triggers the core prohibitions of the Alquist-Priolo Act. Therefore, the project itself does not create a conflict with the Act's primary purpose.

This conclusion is further supported by local plans and ordinances. Policy S 1.2 of the General Plan Safety Element prohibits the construction of structures for human occupancy adjacent to active faults until a comprehensive fault study has been completed and appropriate setbacks are established. The project is consistent with this policy because it does not propose any such construction. The project's activities—the removal of infrastructure—do not increase long-term risk or occupancy in these hazardous areas.

While the Project facilitates the restoration of sites for potential future redevelopment, this EIR does not analyze the project-specific impacts of any such hypothetical future uses, which would be speculative. Any future proposal to construct buildings on a decommissioned site would be

considered a separate project under CEQA. That subsequent project would be subject to its own discretionary review process by the County, which would, at that time, require a comprehensive, site-specific geologic investigation and ensure full compliance with the Alquist-Priolo Act, General Plan Policy S 1.2, and the stringent seismic design requirements of the County Building Code (Title 26).

In summary, because the Project's physical activities are limited to the removal of existing infrastructure and do not involve the construction of new structures for human occupancy, it does not directly or indirectly cause potential substantial adverse effects involving the rupture of a known earthquake fault. Compliance with existing state and local regulations would ensure that any potential future development on these sites would not occur without a thorough evaluation of fault rupture hazards. Therefore, the impact is considered less than significant.

Impact 5.7-1(ii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking? [Threshold GEO-1(b)]

Less Than Significant Impact.

The Project Area, like all of Los Angeles County, is in a seismically active region with numerous active and potentially active faults, including the San Andreas, Newport-Inglewood, and Whittier fault systems. Consequently, strong to severe seismic ground shaking is a significant and unavoidable baseline environmental hazard that is very likely to occur within the useful life of any structure in the region. The intensity of shaking at any given location depends on the earthquake's magnitude, the distance from the epicenter, and the underlying soil and geologic conditions. This pervasive risk is not unique to the project sites but is a regional characteristic of Southern California.

To address this known hazard, the State of California regulates development through the California Building Code (CBC), which contains rigorous standards for building design and construction intended to safeguard against major structural failures and protect life safety during and after an earthquake. The County of Los Angeles has adopted the most recent version of the CBC by reference in its own County Building Code, Title 26. These codes require that all new structures be designed and built to withstand the anticipated level of ground motion at their specific location. Compliance is ensured through the County's mandatory building plan check and development review process. A key requirement for most new development is the preparation of a detailed, site-specific geotechnical investigation. This investigation must calculate seismic design parameters pursuant to CBC requirements and provide foundation and structural design recommendations to reduce hazards to people and structures arising from strong ground shaking.

The Revised Oil Well Ordinance is a regulatory action that does not propose the construction of any new structures for human occupancy. Instead, the project's reasonably foreseeable physical activities are limited to the decommissioning and removal of existing oil and gas infrastructure,

some of which may have been constructed prior to the implementation of modern seismic codes. The removal of this older industrial infrastructure represents a long-term reduction in the overall inventory of structures that could potentially fail during an earthquake, which is a beneficial outcome. The temporary workforce present on-site during these decommissioning activities does not constitute a new, permanent exposure of people to the seismic ground shaking hazard.

Furthermore, while the Project facilitates the restoration of sites for potential future redevelopment, this EIR does not analyze the impacts of any such hypothetical future uses, as they are speculative. Any future proposal to construct buildings on a decommissioned site would be considered a separate project under CEQA and would be subject to its own discretionary review. At that time, that future project would be legally required to demonstrate full compliance with the County Building Code (Title 26) and the CBC, including the preparation of a site-specific geotechnical investigation and the incorporation of all required seismic-resistant design features.

Because the Project removes existing infrastructure rather than building new structures, and because mandatory compliance with the CBC would reduce seismic shaking hazards for any potential future development to a less than significant level, the project would not cause or exacerbate the potential for substantial adverse effects involving strong seismic ground shaking. Therefore, the impact is less than significant.

Impact 5.7-1(iii): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction and lateral spreading? [Threshold GEO-1(c)]

Less Than Significant Impact.

Seismic-related ground failure, particularly liquefaction, is a known geologic hazard in certain parts of Los Angeles County. Liquefaction is a phenomenon in which water-saturated, loose, granular soils lose their strength during strong ground shaking and behave like a fluid. This can lead to building foundation failure, lateral spreading, and differential settlement. The California Geological Survey, pursuant to the Seismic Hazards Mapping Act (Public Resources Code §§ 2690-2699.6), delineates official Seismic Hazard Zones where conditions may be present for liquefaction or earthquake-induced landslides. Portions of the Project Area, particularly the low-lying coastal plains and river floodplains which include parts of the Wilmington and other coastal oil fields, are located within these State-designated

Liquefaction Hazard Zones

State and local regulations are in place to mitigate these risks for new development. The Seismic Hazards Mapping Act requires that a site-specific geotechnical investigation be conducted for most new projects proposed within a designated Liquefaction Hazard Zone. The purpose of the investigation is to evaluate the liquefaction potential at the site and recommend engineering and design solutions to ensure the safety of new structures. Conformance with the recommendations

of the geotechnical report, as well as the seismic design requirements of the California Building Code (CBC) and the County Building Code (Title 26), reduces impacts associated with ground failure to the maximum extent practicable. Standard mitigation practices can include densification of soils, soil reinforcement, and drainage to reduce pore water pressure.

The Revised Oil Well Ordinance is a regulatory action that does not propose the construction of new residential, commercial, or other structures for human occupancy that would be exposed to liquefaction hazards. The reasonably foreseeable physical activities associated with the project are limited to the decommissioning and removal of existing oil and gas infrastructure. This action reduces, rather than increases, the number of structures located within these designated hazard zones. The temporary presence of a construction workforce during decommissioning does not represent a new, permanent exposure of people to the risk of liquefaction.

Furthermore, any future proposal for development on a restored site is speculative and not analyzed as part of this Project. A future project proposed within a designated Liquefaction Hazard Zone would be subject to its own independent, project-level environmental review and discretionary approval process. As part of that process, the future project would be required to comply with all applicable state and local laws, including the preparation of a comprehensive geotechnical investigation and the implementation of all necessary engineering solutions to ensure that potential damage related to liquefaction and lateral spreading would be minimized.

Because the Project removes existing infrastructure rather than constructing new buildings, and because mandatory compliance with existing state and local regulations would reduce liquefaction hazards for any potential future development to a less than significant level, the project would not directly or indirectly cause potential substantial adverse effects involving seismic-related ground failure. Therefore, the impact is less than significant.

Impact 5.7-1(iv): Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides? [Threshold GEO-1(d)]

Less Than Significant Impact.

A landslide is the movement of rock, soil, and debris down a slope and can be triggered by intense rainfall or seismic ground shaking. The California Geological Survey, pursuant to the Seismic Hazards Mapping Act, delineates official Seismic Hazard Zones for areas with a potential for earthquake-induced landslides. The Environmental Setting confirms that many of the County's oil fields are in hillside areas with moderate to steep slopes that are susceptible to landslides, including the Baldwin Hills, Puente Hills, and the mountains bordering the Santa Clarita and San Fernando Valleys. Therefore, a portion of the sites subject to the Project are located within these designated landslide hazard areas.

The County of Los Angeles regulates development in these areas through multiple layers of policy and code to mitigate potential risks. The General Plan Safety Element and the Hillside

Management Area (HMA) Ordinance (County Code Chapter 22.104) establish standards for development on steep slopes to preserve geologic stability and protect public safety. For any new development proposed in a designated landslide zone or HMA, the County requires a site-specific geotechnical investigation. This report must evaluate slope stability and provide recommendations for grading, drainage, foundations, and structural design to ensure that the project does not create or exacerbate a landslide hazard. Compliance with these recommendations and the County's stringent grading and building codes (Title 26) is mandatory.

The Project is a regulatory action that does not involve the construction of new structures for human occupancy that would be exposed to landslide risk. The physical activities associated with the Project are limited to the decommissioning and restoration of existing well sites. These actions, which can include the re-contouring of existing well pads and access roads, will be conducted in a manner that improves, rather than degrades, long-term site stability.

While the Project facilitates the restoration of these sites for potential future redevelopment, this EIR does not analyze the impacts of any such hypothetical future uses, which are speculative. Any future development proposal on a decommissioned site located within a designated landslide hazard zone or HMA would be considered a separate project under CEQA. That subsequent project would be subject to its own discretionary review process, which would require a comprehensive geotechnical investigation and full compliance with all County grading and building codes to mitigate landslide hazards.

Because the Project removes existing infrastructure from hillside areas and does not construct new habitable structures, and because the decommissioning activities themselves are required to be engineered for stability, the Project would not directly or indirectly cause potential substantial adverse effects involving landslides. Therefore, the impact is less than significant.

Impact 5.7-2: Would the project result in substantial soil erosion or the loss of topsoil? [Threshold GEO-2]

Less Than Significant Impact.

The reasonably foreseeable physical activities associated with the Project involve the decommissioning and restoration of existing oil and gas well sites. These activities will inherently require ground disturbance, including the excavation and removal of wellheads, pipelines, and foundations; the dismantling of surface equipment; and the grading and re-contouring of well pads and access roads to restore natural topography. Such activities will temporarily expose soils, creating the potential for erosion by wind and water, particularly on the numerous Project sites located in hillside areas with steep slopes.

However, this potential impact is addressed through a comprehensive, multi-layered regulatory framework that is mandatory for all such ground-disturbing activities in the County. Compliance with these existing regulations, which are designed to control construction-related erosion, is not considered mitigation under CEQA but is a standard requirement of any project.

First, any significant grading activity is subject to a permit from County Public Works, pursuant to the County Grading Code (Title 26, Appendix J). As a standard condition of this permit, the operator must prepare and implement a site-specific Erosion and Sediment Control Plan. This plan must specify the Best Management Practices (BMPs)—such as silt fences, fiber rolls, gravel bags, and stabilized construction entrances—that will be used to prevent erosion and retain sediment on-site during all phases of work.

Second, for any decommissioning site where ground disturbance is one acre or larger, the operator will be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) Construction General Permit, which is administered by the State Water Resources Control Board. This permit mandates the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a comprehensive document that identifies all potential pollutant sources, including sediment, and prescribes specific BMPs to be deployed before, during, and after storm events to minimize soil loss and protect water quality.

The long-term outcome of the Project is site restoration, which involves the permanent stabilization and revegetation of disturbed areas, ultimately reducing long-term erosion potential compared to the baseline condition. Any potential future redevelopment of these sites would be subject to the County's Low Impact Development (LID) Ordinance (Title 12), which requires the implementation of permanent, post-construction measures to manage stormwater runoff and control hydromodification.

While the Project's decommissioning activities will temporarily disturb soil and create a potential for erosion, this impact is rendered less than significant through mandatory compliance with County grading permits, state NPDES and SWPPP requirements, and the Project's own enforceable Project Design Feature. Therefore, the Project would not result in substantial soil erosion or the loss of topsoil.

Table 5.7-5 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind.	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales.
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping.
Wind Erosion Controls	The aims and methods of wind erosion control are similar to those of "Erosion Control," above.	See "Erosion Controls," above.
Tracking Controls	Minimize the tracking of soil offsite by vehicles.	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.
Nonstorm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

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Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

Impact 5.7-3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? [Threshold GEO-3]

Less Than Significant Impact.

The Project Area is geographically expansive and encompasses a wide variety of geologic settings and soil types. While many sites are geologically stable, some existing oil fields are in areas known to have potentially unstable geologic units or soils, including those susceptible to landslides, liquefaction, and subsidence as previously discussed. This threshold addresses two distinct considerations: 1) whether the Project would expose people or structures to hazards by being located on unstable ground, and 2) whether the Project's activities would themselves cause or worsen ground instability.

First, the Project does not propose the construction of new structures for human occupancy that would be exposed to risks from existing unstable soils. The Project's primary action is the removal of existing industrial infrastructure from these locations. This represents a long-term reduction in the intensity of use and the number of facilities in geologically sensitive areas. The historical issue of subsidence related to the large-scale withdrawal of underground fluids will also cease upon the termination of oil extraction activities, which is a beneficial impact.

Second, the physical activities associated with decommissioning, such as grading and re-contouring of well pads, could have the potential to cause instability if not properly engineered. However, this potential impact is addressed by both existing regulations and by a specific, enforceable feature of the Project itself. Any significant grading activities are subject to review and permitting by County Public Works under the County Grading Code (Title 26). This process requires the preparation of site-specific grading plans and, where necessary, soils and geology reports to address slope stability and other geologic issues.

Finally, any potential future development on these restored sites is speculative and not part of the Project scope. Any such subsequent project would undergo its own environmental review and would be required to comply with all applicable state and County regulations, including the recommendations of a site-specific geotechnical report and General Plan Safety Element Policy S 1.3, which requires developments to mitigate geotechnical hazards like soil instability.

In summary, the Project does not place new structures or people at risk from existing unstable soils. The decommissioning activities themselves are required by Project design and existing regulations to be engineered in a manner that ensures geologic stability. Therefore, the Project would not result in substantial adverse effects related to unstable soils or geologic units, and the impact is less than significant.

Impact 5.7-4: Would the project be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial risks to life or property? [Threshold GEO-4]

Less than Significant Impact.

Expansive soils are soils with high clay content that are prone to significant volume changes—swelling when wet and shrinking when dry. This shrink-swell behavior can exert immense pressure on building foundations, pavement, and underground utilities, potentially causing substantial

damage. While there are no comprehensive maps showing the distribution of expansive soils in Los Angeles County, they are known to occur locally throughout the geologically diverse Project area.

The potential hazards associated with expansive soils are addressed through the mandatory requirements of the California Building Code (CBC) and the County Building Code (Title 26). These codes require a site-specific geotechnical investigation for new construction projects to identify soil characteristics, including the soil's expansion potential. If soils are determined to be expansive, the codes prescribe specific, non-discretionary engineering solutions to prevent structural damage. These can include removal and replacement of the soil, treatment of the soil to reduce its expansion potential, or the design of specialized foundations (such as post-tensioned slabs or deep-pier foundations) that can withstand soil movement.

The Project is a regulatory action that does not involve the construction of new buildings, foundations, or other permanent structures that would be subject to risks from expansive soils. The reasonably foreseeable physical activities are limited to the decommissioning and removal of existing oil and gas infrastructure and the restoration of the sites. These temporary activities do not create new, permanent risks to life or property from expansive soils.

Furthermore, any future proposal for development on a restored site is speculative and not analyzed as part of this Project. A subsequent development project would be subject to its own independent, project-specific environmental review and the County's building plan check process. As part of that process, the future project would be legally required to conduct a geotechnical investigation. If expansive soils were found, the project would be mandated to comply with all applicable CBC and County Building Code requirements, incorporating the necessary engineered solutions to mitigate any potential issues.

Because the Project removes existing infrastructure rather than constructing new buildings, and because mandatory compliance with the County Building Code would reduce hazards from expansive soils for any potential future development to a less than significant level, the Project would not create substantial direct or indirect risks to life or property. Therefore, the impact is less than significant.

Impact 5.7-5: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? [Threshold GEO-5]

No Impact.

This threshold is intended to evaluate projects that generate wastewater and require a disposal method in areas not served by public sewers, such as new residential or commercial developments. The Project is a regulatory action to phase out industrial oil and gas operations. It

does not involve the construction or operation of any new land uses that would generate domestic wastewater or require the use of septic tanks or any alternative wastewater disposal systems.

The physical activities associated with the Project are limited to the decommissioning of industrial equipment and the environmental restoration of the sites. These activities do not generate wastewater requiring an Onsite Wastewater Treatment System (OWTS). Because the Project does not create any new source of wastewater, it does not create any demand for new septic tanks. Therefore, the capacity of the soils on the Project sites to support a septic system is not relevant to the environmental impacts of this Project, and no impact would occur.

Furthermore, any potential future development on these restored sites is speculative and not part of this Project's scope. Should a future land use be proposed on a decommissioned site in an area not served by a public sewer, that new project would be subject to a separate discretionary review process. It would be required to demonstrate full compliance with all County regulations governing OWTS, including Titles 11 and 28 of the County Code. This would involve submitting a feasibility study and soil percolation tests to the Department of Public Health to prove soil capability before any permit for an OWTS could be issued. As the Project itself creates no need for wastewater disposal, it will have no impact related to soil suitability for septic systems.

Impact 5.7-6: Would the project conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)? [Threshold GEO-6]

Less than Significant Impact.

The County Hillside Management Area (HMA) Ordinance regulates development on natural slopes of 25 percent or greater. Its purpose is to ensure that new development in these areas is sited and designed to minimize geologic hazards, control erosion, and protect the natural and scenic character of the County’s hillsides. The Environmental Setting confirms that a significant number of the oil and gas facilities subject to the Project are located in hilly or mountainous terrain that qualifies as an HMA.

The HMA Ordinance is primarily applicable to new development projects, such as the construction of buildings or the subdivision of land. The Project is a regulatory action that does not authorize or propose any such new development. Instead, its reasonably foreseeable physical activities involve the decommissioning of existing industrial infrastructure and the restoration of the land to a more natural state. These actions are not in conflict with the goals of the HMA Ordinance; in fact, the removal of industrial uses and the stabilization of graded pads and access roads are consistent with the ordinance's objectives of minimizing hazards and protecting natural terrain.

While decommissioning activities will involve grading, these actions are subject to the permitting requirements of the County Grading Code (Title 26), which ensures that all earthwork is engineered for slope stability.

Any potential future development on a restored site is speculative and not analyzed as part of this Project. A subsequent development project proposed within an HMA would be subject to its own independent, project-specific environmental review and discretionary approval process. At that time, that future project would be required to demonstrate full compliance with all applicable provisions of the HMA Ordinance, including its Hillside Design Guidelines, to ensure that development is sited and designed in a sensitive manner.

Because the Project does not involve the type of new development regulated by the HMA Ordinance and its own physical activities are consistent with the ordinance's goals of enhancing geologic stability, the Project would not conflict with the HMA Ordinance. Therefore, the impact is less than significant.

Impact 5.7-7: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? [Threshold GEO-7]

Less than Significant Impact.

As described in the Environmental Setting, Los Angeles County contains geologic formations with high paleontological sensitivity, having yielded numerous scientifically significant fossils. The Project is a regulatory action that does not authorize new development; however, it mandates the decommissioning and restoration of existing oil well sites (PDF-LU-1 and PDF-LU-2).

These ground-disturbing activities (e.g., grading, concrete pad removal, pipeline extraction) will occur almost exclusively within the previously disturbed footprints of existing oil and gas facilities. In these locations, the native soils and upper geologic units have already been altered, graded, or replaced with artificial fill during the decades-long operation of the oil field. Decommissioning does not typically require deep, massive excavations into previously undisturbed bedrock where intact paleontological resources are most likely to be encountered. Furthermore, any unauthorized collection or destruction of paleontological resources on public lands is prohibited under California Public Resources Code Section 5097.5. While the Project's physical activities are largely confined to previously disturbed industrial sites, site remediation and contaminated soil removal could occasionally require deeper excavations into sensitive, undisturbed native bedrock. To ensure that unexpected fossil discoveries are handled appropriately, any such excavations will be subject to mandatory compliance with existing state laws, including California Public Resources Code Section 5097.5, and standard County grading permit requirements. These existing regulatory frameworks enforce strict unanticipated discovery protocols, mandating the immediate cessation of ground-disturbing work within a 50-foot radius of a fossil find until a qualified paleontologist can evaluate and recover the resource. Because the Project relies on mandatory compliance with these existing legal frameworks rather than project-specific mitigation, the potential to inadvertently destroy unique paleontological resources is minimized to the maximum extent feasible. Therefore, the impact would be less than significant.

5.7.5 Cumulative Impacts

This section evaluates whether the Project's impacts on geology, soils, and paleontological resources, when combined with other past, present, and reasonably foreseeable future projects, would be cumulatively considerable. The geographic scope for this analysis is Los Angeles County and the broader Southern California region, which shares a common geologic and seismic setting.

Cumulative Conditions in Los Angeles County

Geologic and soil impacts are typically site-specific, as hazards like fault rupture, liquefaction, and soil instability are dependent on the conditions at a particular location. However, a cumulative impact can occur when widespread regional development incrementally increases the exposure of people and property to these baseline hazards. The cumulative context for the region is one of continued growth in a seismically active area. This growth, including residential, commercial, and infrastructure projects, will place more people and structures in areas subject to geologic risks.

However, all cumulative development projects within Los Angeles County and adjacent jurisdictions are subject to the same comprehensive and mandatory regulatory framework. This includes the California Building Code (CBC), the Alquist-Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and local grading and building ordinances. These regulations require that each new project conduct site-specific geotechnical investigations and incorporate engineered solutions to mitigate site-specific hazards. Because every project must independently comply with these stringent safety standards, cumulative impacts related to geologic hazards are considered less than significant.

Paleontological resources, which are non-renewable, present a different cumulative issue. Widespread grading and excavation from regional development can result in the incremental destruction of scientifically important fossils, leading to a significant cumulative loss of scientific data.

Project Contribution to Cumulative Impacts

The Project's contribution to cumulative geologic and seismic risk is not considerable; in fact, by removing industrial infrastructure from hazardous locations and not increasing the permanent population, the Project has a neutral or beneficial effect on cumulative risk exposure.

Regarding paleontological resources, the Project's decommissioning activities will involve ground disturbance in geologic formations known to have high paleontological sensitivity and therefore could theoretically contribute to a cumulative loss. However, the Project's incremental contribution is not cumulatively considerable because the mandated decommissioning activities will be confined almost exclusively to the previously disturbed footprints of existing industrial oil facilities. The Project does not authorize new, deep excavations into undisturbed bedrock that would typically contribute to the regional cumulative loss of fossil resources. Furthermore, any temporary,

short-term earth-moving activities are subject to strict unanticipated discovery protocols under existing state laws (such as California Public Resources Code Section 5097.5) to ensure any accidental finds are preserved.

Conclusion on Cumulative Impacts

Because the Project does not increase exposure to geologic hazards and requires mandatory compliance with existing state laws to prevent the unmitigated loss of paleontological resources, its contribution is not cumulatively considerable, and the cumulative impact is less than significant.

5.7.6 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to geology, soils, and paleontological resources resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project is a regulatory action to phase out industrial land uses and does not involve the construction of new structures for human occupancy. Any temporary, short-term risks associated with the decommissioning of existing oil production facilities—including earth-moving activities that could encounter unique paleontological resources—are minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and local regulations (including the California Building Code, County Building and Grading Codes, the Alquist-Priolo Earthquake Fault Zoning Act, the Seismic Hazards Mapping Act, and California Public Resources Code Section 5097.5), as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.7.7 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to geology, soils, or paleontological resources. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs) that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks governing grading, seismic safety, and unanticipated paleontological discoveries. Because the Project does not result in significant impacts to geology, soils, or paleontological resources, no CEQA mitigation measures are necessary.

5.7.8 Level of Significance After Mitigation

The Project's impacts related to geology, soils, and paleontological resources were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.7.9 References

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CHAPTER 5.8 GREENHOUSE GAS EMISSIONS

This section of the Environmental Impact Report (EIR) evaluates the potential for the proposed Revised Oil Well Ordinance (Project) to result in significant impacts related to greenhouse gas (GHG) emissions and climate change. The analysis describes the existing regulatory and environmental setting for GHG emissions, evaluates the Project's consistency with applicable federal, state, and local GHG reduction plans, and analyzes the Project's potential to generate GHG emissions during its implementation. This includes a discussion of short-term emissions associated with the decommissioning and restoration of existing well sites, as well as the long-term effects resulting from the permanent cessation of oil and gas extraction activities.

This section is also responsive to comments and known areas of controversy raised during the public scoping process. Specifically, the analysis addresses the issue of "carbon leakage"—the potential for GHG emissions to be displaced to other jurisdictions as a result of phasing out local oil production—and considers this in the context of statewide regulations such as California's Low Carbon Fuel Standard (LCFS).

The analysis is based on a review of federal, state, and local GHG reduction policies, including:

- The County General Plan, including the 2045 Climate Action Plan (CAP)
- The OurCounty Sustainability Plan
- Guidance from the South Coast Air Quality Management District (SCAQMD) and the Antelope Valley Air Quality Management District (AVAQMD)
- The California Air Resources Board (CARB) 2022 Climate Change Scoping Plan, which provides the statewide framework for achieving carbon neutrality

Many comments were submitted regarding the project's potential effect on greenhouse gas (GHG) emissions, which are a primary cause of climate change. As shown in Table 2-1: Summary of Scoping Comments Received, commenters expressed different perspectives on this issue. Environmental and community groups stated that the project is a necessary climate action to reduce GHG emissions by phasing out local fossil fuel extraction. In contrast, oil industry representatives and other individuals argued that the Project would result in a net increase in global GHG emissions because imported oil has a higher carbon footprint due to transportation and less stringent production regulations in other countries. The analysis in this chapter considers these points and evaluates the project’s potential GHG emissions.

5.8.1 Environmental Setting

5.8.1.1 Regulatory Setting

Federal Regulations

The United States Environmental Protection Agency (U.S. EPA) is the federal agency responsible for regulating greenhouse gas (GHG) emissions. The authority for this regulation stems from the federal Clean Air Act (CAA) and was clarified by a series of U.S. Supreme Court rulings and subsequent administrative actions. The federal approach to GHG regulation encompasses standards for mobile and stationary sources, as well as broader national energy policy.

Clean Air Act Authority and Endangerment Finding

The U.S. Supreme Court's decision in Massachusetts v. U.S. EPA, 549 U.S. 497 (2007), was a foundational ruling for federal climate policy. The Court found that GHGs are "air pollutants" as defined under the Clean Air Act and directed the U.S. EPA to determine whether GHG emissions from new motor vehicles cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare.

On December 7, 2009, the U.S. EPA Administrator signed two distinct findings in response to the Court's ruling. The first, the "Endangerment Finding," determined that the elevated atmospheric concentrations of six key GHGs—carbon dioxide (CO2), methane (CH4), nitrous oxide (NO), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6)—threaten the public health and welfare of current and future generations. The second, the "Cause or Contribute Finding," determined that the combined GHG emissions from new motor vehicles contribute to the air pollution that endangers public health and welfare. These findings established the legal basis for the U.S. EPA to regulate GHG emissions under the Clean Air Act.

Regulation of Stationary Sources

Following the Endangerment Finding, the U.S. EPA also began regulating GHG emissions from large stationary sources, such as power plants and industrial facilities.

- Greenhouse Gas Reporting Program: The U.S. EPA implemented the Greenhouse Gas Reporting Program (40 C.F.R. Part 98), which requires large GHG emitters, including certain oil and gas production facilities, to collect and report their emissions data annually. This provides a national inventory of GHG emissions.
- Permitting for Large Emitters: The U.S. EPA also phased in requirements for large stationary sources to obtain Prevention of Significant Deterioration (PSD) and Title V operating permits for their GHG emissions, requiring them to implement best available control technologies.

Regulation of Mobile Sources and Fuel Economy

Federal regulation of GHGs has heavily focused on reducing emissions from the transportation sector through vehicle emissions standards and fuel economy requirements.

- Energy Independence and Security Act of 2007 (EISA): This act established several key measures to reduce national GHG emissions, including increasing the supply of alternative fuels by setting a mandatory Renewable Fuel Standard and raising the Corporate Average Fuel Economy (CAFE) standards for the combined fleet of cars and light trucks to 35 miles per gallon (mpg) by model year 2020.
- Joint EPA and NHTSA Vehicle Standards: Following the Endangerment Finding, the U.S. EPA and the National Highway Traffic Safety Administration (NHTSA) have issued a series of joint final rules to set coordinated GHG emissions and CAFE standards for light-duty, medium-duty, and heavy-duty vehicles. These standards have evolved through several phases:
    - Initial standards were set for model years 2012-2016.
    - More stringent standards were adopted in 2012 for model years 2017–2025, which were projected to achieve an industry fleet-wide average equivalent to 54.5 mpg by 2025.
    - In 2019, the "Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule Part One" attempted to freeze these standards at 2020 levels and revoke California's authority to set its own, more stringent standards. However, this action was subsequently reversed.
    - In March 2022, NHTSA finalized new, more stringent CAFE standards that require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026.

National Climate and Energy Policy

The Inflation Reduction Act of 2022 (IRA): This act represents the most significant investment in climate and energy reform in U.S. history. The IRA allocates substantial federal funding to accelerate the transition to a clean energy economy through tax credits and incentives for renewable energy infrastructure (e.g., solar and wind), the purchase of electric vehicles, and improvements in residential energy efficiency. The act is projected to reduce national GHG emissions by approximately 40 percent below 2005 levels by 2030.

State Regulations

California has established a comprehensive and legally binding framework to reduce GHG emissions and address climate change. This framework, the most advanced in the nation, consists of legislation, executive orders, and agency-led plans that set ambitious targets for emissions reductions across all sectors of the economy. The Proposed Project is consistent with, and in many cases directly implements, the State's clear policy direction to transition away from fossil fuel dependency. All activities associated with the Project, and any future land uses on the decommissioned sites, will be required to comply with these various regulatory measures.

Statewide Climate Change Targets

California’s climate policy is driven by a series of landmark legislative acts that establish declining GHG emission caps over time, creating a legally binding framework for decarbonization as described in the following sections.

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

The foundation of the State's climate policy is Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006. AB 32 provided the initial framework to reduce California's GHG emissions to 1990 levels by 2020, a goal that the state successfully met. In 2016, Senate Bill (SB) 32 codified the State's more aggressive mid-term climate target, legally requiring California to reduce statewide GHG emissions to at least 40 percent below 1990 levels by 2030.

Carbon Neutrality Goals (EO B-55-18 and AB 1279)

Executive Order (EO) B-55-18, issued in 2018, established a statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net-negative emissions thereafter. This goal was codified into law with the passage of AB 1279, the California Climate Crisis Act, in 2022. AB 1279 declares that it is the policy of the state to achieve net-zero GHG emissions no later than 2045 and requires that this be accomplished in part by reducing statewide anthropogenic GHG emissions to at least 85 percent below 1990 levels.

CARB Climate Change Scoping Plan

As required by AB 32, the California Air Resources Board (CARB) prepares a Climate Change Scoping Plan, updated every five years, which serves as the State's primary strategy for achieving its GHG reduction targets.

The 2022 Scoping Plan is the current strategy designed to guide the state toward its 2030 and 2045 climate goals. The plan outlines an ambitious path that relies on a rapid transition away from fossil fuels, focusing on the large-scale electrification of vehicles and buildings and the decarbonization of the electricity supply. Notably, the 2022 Scoping Plan identifies a managed decline of in-state fossil fuel production as a necessary component of its strategy. CARB's analysis concluded that phasing out oil extraction is essential to align the state's energy supply with its climate goals, reduce public health harms in frontline communities, and support the transition to a carbon-neutral economy. This provides direct state-level policy support for the objectives of the Proposed Project.

Regulations Pertaining to Oil and Gas Production

In addition to broad climate targets, the State has enacted legislation and regulations specifically targeting the public health and environmental impacts of oil and gas extraction, described in the following sections.

CARB Oil and Gas Methane Regulation

To control potent, short-lived climate pollutants, CARB adopted a specific regulation for GHG emissions from crude oil and natural gas facilities (California Code of Regulations, Title 17, §§ 95665-95677). This regulation targets methane and volatile organic compound (VOC) emissions by requiring operators to implement robust Leak Detection and Repair (LDAR) programs, replace high-bleed pneumatic devices, and control emissions from separators, tanks, and wells. The

Project supports the ultimate goal of this regulation by phasing out the very sources of emissions it seeks to control.

SB 1137 (Health Protection Zones and Setbacks)

Enacted in 2022, SB 1137 prohibits the construction of new oil and gas wells within a 3,200-foot 'health protection zone' around sensitive receptors like homes and schools. It also mandates stringent engineering and air monitoring controls for existing wells within these zones. Following the withdrawal of a referendum in June 2024, the law is now fully in effect and represents a clear, active policy directive from the State Legislature to protect communities from the health risks associated with proximity to oil and gas operations.

Executive Order N-79-20 (Transitioning Away from Fossil Fuels)

While primarily focused on zero-emission vehicles, EO N-79-20 also explicitly addresses the future of oil extraction. It directs state agencies to develop strategies to "manage and expedite the responsible closure and remediation of former oil extraction sites as the State transitions to a carbon-neutral economy." The Proposed Project is a direct local implementation of this state-level directive.

Sector-Specific GHG Regulations

Building Energy and Efficiency (Title 24)

While the Project does not propose new construction, any future redevelopment of the decommissioned sites would be subject to California's Building Energy Efficiency Standards (Title 24, Part 6) and the California Green Building Standards Code (CALGreen, Title 24, Part 11). These codes ensure that the long-term land use transition facilitated by the Project will align with state energy efficiency and building decarbonization goals.

Renewable Energy Procurement (SB 100)

California's Renewable Portfolio Standard (RPS) program, culminating in SB 100, requires that renewable and zero-carbon resources supply 100 percent of all retail electricity in California by 2045. The Project supports this goal by reducing demand from an energy-intensive industrial sector, thereby alleviating load on the grid.

Mobile Source Emissions (ACC II, ACT, and LCFS)

CARB's Advanced Clean Cars II (ACC II) and Advanced Clean Trucks (ACT) regulations mandate a transition to 100 percent zero-emission new vehicle sales by 2035 for light-duty vehicles and by 2045 for most medium- and heavy-duty vehicles. These regulations systematically eliminate the long-term demand for petroleum fuels. The Low Carbon Fuel Standard (LCFS) complements this by requiring a reduction in the carbon intensity of all transportation fuels sold in the state.

Sustainable Communities Strategy (SB 375)

SB 375 links regional transportation planning with land use to reduce vehicle miles traveled (VMT), further reducing transportation-related GHG emissions.

Summary of State Regulatory Framework

Collectively, California's climate change statutes and regulations create a comprehensive and legally binding framework that requires a decisive, economy-wide transition away from fossil fuels. The State's policies for energy, transportation, and land use are all aligned toward achieving deep GHG emissions reductions and eventual carbon neutrality. The Proposed Project, by phasing out local oil and gas production, is not only consistent with this framework but is a direct local implementation of the State's strategic goals.

Local Regulations

GHG emissions and climate change policy in the unincorporated areas of Los Angeles County are addressed through a multi-layered framework of regional and local plans. This framework includes guidance from regional air districts, transportation and land use planning from the Southern California Association of Governments (SCAG), and the County's own adopted climate, sustainability, and general plans. The Proposed Project is not only consistent with these local plans but is a direct implementation of several of their core strategies.

Regional Air Quality Management Districts

The County of Los Angeles spans two regional air districts that provide CEQA guidance for GHG analysis:

- South Coast Air Quality Management District (SCAQMD): The SCAQMD is the primary air pollution control agency for the South Coast Air Basin, where all the County's current oil production occurs. The SCAQMD has formally adopted an interim GHG significance threshold of 10,000 MTCO2e/year (metric tons of CO2 equivalent per year) for stationary industrial projects. The agency also proposed a threshold of 3,000 MTCO2e/year for non-industrial projects, but this was a recommendation and has not been formally adopted.
- Antelope Valley Air Quality Management District (AVAQMD): The AVAQMD has jurisdiction over the northern portion of Los Angeles County. Like the SCAQMD, it provides guidance for the evaluation of GHG emissions from projects within its boundaries.

Southern California Association of Governments (SCAG)

Pursuant to SB 375, SCAG is the metropolitan planning organization responsible for developing a long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) to integrate land use and transportation planning and reduce regional VMT and associated GHG emissions.

The current plan is the 2024–2050 Connect SoCal plan. This plan sets forth a forecasted development pattern that, when integrated with transportation measures, is designed to meet CARB's regional GHG reduction targets for the passenger vehicle sector. Connect SoCal's strategy focuses on concentrating new housing and job growth in high-quality transit areas and other opportunity zones to create more walkable, transit-rich communities. The

Project supports the overarching goals of Connect SoCal by phasing out a sprawling, VMT-intensive industrial land use. This action reduces regional truck and employee commute trips associated with oil production and makes formerly industrial parcels available for potential future uses that could be more consistent with Connect SoCal's goals for infill development and land use efficiency.

County of Los Angeles Plans and Policies

The County has adopted a suite of forward-looking, integrated plans that establish a clear policy directive to transition away from fossil fuels and reduce GHG emissions, described below.

OurCounty Sustainability Plan

Adopted in 2019, the OurCounty plan is a comprehensive framework for improving the environmental, social, and economic sustainability of the region. The plan establishes ambitious goals and actions to guide the County's future. The Proposed Project is a direct and foundational implementation of several of the plan's key goals, including:

- Goal 1: "A fossil fuel-free LA County"
- Goal 2: "Healthy and safe communities"
- Goal 4: "A prosperous Los Angeles County that provides opportunities for all residents and businesses and supports the transition to a green economy"

By phasing out oil extraction, the Project directly advances the vision of OurCounty to create an economy that runs on renewable energy instead of fossil fuels.

General Plan

The General Plan provides the overarching policy framework for land use, conservation, and mobility that supports GHG reduction. The Project, which includes amendments to the General Plan, is designed to ensure consistency with this framework. The Project directly supports and implements numerous General Plan policies aimed at climate action, energy conservation, and sustainable land use, including the following:

Climate Action and Energy: The Project helps the County achieve its climate goals as required by Policy AQ 3.1 (Facilitate the implementation… of the Community Climate Action Plan). By phasing out an energy-intensive industrial use and facilitating the potential for future renewable-compatible

land uses, the Project supports Policy C/NR 12.1 (Encourage the production and use of renewable energy resources).

Sustainable Land Use and VMT Reduction: The Project supports policies that encourage infill development on underutilized or brownfield sites (Policy LU 4.1) and promote land use patterns that reduce VMT (Policy LU 5.3). By removing a sprawling industrial use, the Project reduces land use conflicts (Policy LU 7.1) and helps protect communities from noxious impacts and health risks (Policy LU 1.6), consistent with the General Plan's vision for healthier, more sustainable communities.

2045 Climate Action Plan (CAP): The 2045 CAP, a component of the General Plan, is the County's primary planning document for achieving its GHG reduction targets and setting a course toward carbon neutrality by 2045, consistent with state goals. The 2045 CAP superseded the County's previous 2015 Community Climate Action Plan. The Project is not only consistent with the 2045 CAP; it is a cornerstone of its implementation. The Project directly executes Measure ES-1 of the CAP, which explicitly calls for the County to "develop a sunset strategy and phase out all oil and gas operations in unincorporated areas". Therefore, the adoption of the Revised Oil Well Ordinance is a required action for the County to meet its adopted climate goals.

Summary of Local Regulations

Local regulations and plans create a multi-layered framework that guides GHG reduction efforts in Los Angeles County. The Proposed Project is not only consistent with this framework but is a direct implementation of several key local climate and sustainability mandates.

- Regional Air Districts: The South Coast Air Quality Management District (SCAQMD) and Antelope Valley Air Quality Management District (AVAQMD) provide the regulatory framework and technical guidance for GHG analysis under CEQA.
- Southern California Association of Governments (SCAG): The regional transportation plan, Connect SoCal, aims to reduce vehicle miles traveled (VMT) and associated GHG emissions. The Project supports these goals by phasing out a VMT-intensive industrial use.
- OurCounty Sustainability Plan: The Project directly implements key goals of this plan, including the vision for a "fossil fuel-free LA County”.
- General Plan: The General Plan provides the foundational land use, conservation, and mobility policies that support GHG reduction. The Project includes a General Plan Amendment to ensure full consistency with these goals. Furthermore, the Project is a cornerstone of the County's adopted 2045 Climate Action Plan, as it is the specific action required to implement Measure ES-1, which calls for the "phase out all oil and gas operations in unincorporated areas”.

5.8.1.2 Existing Environmental Conditions

This section describes the existing environmental setting for greenhouse gas (GHG) emissions. Climate change is a global phenomenon, driven by the cumulative accumulation of GHGs in the earth's atmosphere. Unlike criteria air pollutants which can have localized effects, the impacts of GHG emissions are global in nature. Therefore, the baseline for this analysis is the context of

global, national, state, and local GHG emission inventories, with a specific focus on the emission sources that the Proposed Project would affect.

Climate Change

Climate change refers to a significant change in climate measures, such as temperature, precipitation, or wind, lasting for an extended period. The Earth's temperature depends on the balance between energy entering and leaving the planet's system. The "greenhouse effect" is the natural process by which certain gases in the atmosphere trap and build up heat, regulating the Earth's temperature and creating a livable environment. Human activities that emit additional GHGs into the atmosphere increase the amount of heat that gets absorbed, enhancing the greenhouse effect and causing the Earth's surface temperature to rise.

While the Earth's climate has varied naturally over geologic time, the scientific consensus, as articulated by the Intergovernmental Panel on Climate Change (IPCC), is that it is "extremely likely" that human activities have been the dominant cause of the warming observed since the mid-20th century. This human influence is evident from the increasing GHG concentrations in the atmosphere, which have risen to levels unprecedented in the last 800,000 years, primarily from fossil fuel emissions.

Greenhouse Gases and Global Warming Potential

A GHG is any gas that absorbs infrared radiation in the atmosphere. As defined in California Health and Safety Code Section 38505(g), the primary GHGs of concern are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), and several manufactured fluorinated gases.

- Carbon Dioxide (CO2): The principal anthropogenic GHG, released primarily through the combustion of fossil fuels (coal, oil, and natural gas) for energy and transportation.
- Methane (CH4): The primary component of natural gas, methane is a potent GHG produced by the anaerobic decomposition of waste in landfills, animal digestion, and from leaks in the production and distribution of natural gas and petroleum.
- Nitrous Oxide (N2O): Primarily produced through agricultural and industrial activities, as well as the combustion of fossil fuels.

To compare the heat-trapping ability of different gases, the IPCC developed the concept of Global Warming Potential (GWP). GWP is a measure of how much energy the emissions of 1 ton of a gas will absorb over a given period, relative to the emissions of 1 ton of CO2. For this analysis, GHG emissions are measured in metric tons of CO2 equivalent (MTCO2e), using the GWP values from the IPCC's Fourth Assessment Report (e.g., methane has a GWP of 25).

Sources of Greenhouse Gas Emissions

Global and National Inventories: According to the U.S. EPA's *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, total United States GHG emissions were approximately 5,981 million metric tons (MMT) CO2e in 2020. The primary source was fossil fuel combustion.

State of California Inventory: According to CARB's 2022 GHG inventory edition, California emitted 369.2 MMT CO2e in 2020. The primary sources of these emissions are broken down in the table below.

Source Category	2020 Annual GHG Emissions (MMT CO2e)	Percent of Total
Transportation	136.60	37%
Industrial	73.84	20%
Electric Power	59.07	16%
Commercial & Residential	36.93	10%
Agriculture	33.22	9%
High GWP Substances	22.15	6%
Recycling and Waste	7.38	2%
Total	**369.2**	**100%**
Source: CARB 2022b. Total may not sum due to rounding.		

Local Inventory (Unincorporated Areas): The County's 2045 CAP provides a GHG emissions inventory for the unincorporated areas, with the most recent baseline year being 2018. Transportation is the largest source of local emissions.

Source Category	2018 Annual GHG Emissions (MT CO2e)	Percent of Total
Transportation	2,704,685	53%
Stationary Energy	1,698,809	33%
Waste	469,382	9%
Industrial Processes	239,505	5%
Agriculture and Forestry	60,860	1%
Total	**5,137,240**	**100%**
Source: Los Angeles County 2045 CAP. Total may not sum due to rounding.		

Existing Emissions from Project Area Facilities: The existing oil and gas facilities that are the subject of the Project are known sources of GHG emissions. As established in this EIR's Environmental Setting, a precise, quantitative inventory for all facilities is considered speculative. The primary sources of GHG emissions from these facilities include:

- Fugitive Methane (CH4) Emissions: Unintentional releases from wellheads, valves, connectors, tanks, and other components.
- Stationary Combustion (CO2) Emissions: Emissions from the on-site combustion of fossil fuels in engines, heaters, and flares to power operations.
- Mobile Source (CO2) Emissions: Emissions from heavy-duty trucks and worker commute vehicles.

Potential Effects of Climate Change

Continued GHG emissions are projected to cause further warming and significant changes to the climate system. The Fourth California Climate Change Assessment provides detailed projections for the Los Angeles region, which include:

- Increased Temperatures: Average maximum temperatures in the Los Angeles region are projected to increase by 4°F to 5°F by mid-century, with the number of extremely hot days also expected to rise.
- Changes in Precipitation: While average precipitation may not change significantly, both dry and wet extremes are expected to increase, with more severe droughts and more intense atmospheric river events.
- Sea-Level Rise: Projections indicate roughly 1 to 2 feet of sea-level rise by mid-century, threatening coastal communities.
- Increased Wildfire Risk: Projections indicate that the risk of wildfire may increase over Southern California.

5.8.2 Thresholds of Significance

In accordance with the County's Environmental Checklist Form (Initial Study) and Appendix G of the State CEQA Guidelines, the applicable thresholds of significance regarding greenhouse gas emissions are listed below. A project may have a significant impact if it would:

GHG-1: Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment.

GHG-2: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

5.8.3 Environmental Impacts

5.8.3.1 Methodology

As described in Chapter 3, Project Description, the Revised Oil Well Ordinance is a policy-level Project that does not include or propose any site-specific development. The analysis in this EIR is therefore programmatic and evaluates the reasonably foreseeable physical changes to the environment that could occur because of the Project's implementation.

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the implementation of the CAP, driven heavily by energy decarbonization measures like Measure ES1, would result in a massive net decrease in GHG emissions across unincorporated Los Angeles County (CAP PEIR, 3.9-35). The CAP PEIR determined that short-term construction-related GHGs are an unavoidable byproduct of implementing decarbonization strategies, but that the long-term operational impact is overwhelmingly beneficial. Because the CAP PEIR concluded that programmatic GHG impacts

were less than significant, no GHG-specific mitigation measures were adopted in the CAP PEIR. Therefore, this analysis strictly evaluates the incremental short-term GHG emissions of ROWO's decommissioning activities against the permanent GHG reduction benefits, consistent with the CAP PEIR's findings. Because these short-term decommissioning activities are governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with existing state efficiency regulations (such as California Air Resources Board emissions standards), this analysis focuses on demonstrating how these existing frameworks ensure the Project's overall GHG impacts remain less than significant.

Consistent with CEQA Guidelines (§15064.4), the significance of the Project's GHG impacts is determined primarily through a qualitative evaluation of its net effect on GHG emissions and its consistency with applicable GHG reduction plans. While air districts like the South Coast Air Quality Management District (SCAQMD) have developed quantitative, emissions-based screening thresholds, this guidance was specifically designed for land use development projects that generate new, long-term operational emissions.

These quantitative thresholds are not the appropriate metric for evaluating the Proposed Project, which is a regulatory action that results in a net reduction of long-term operational emissions. Therefore, the analysis is based on the two primary GHG thresholds from Appendix G of the CEQA Guidelines, as described below.

Methodology for Threshold GHG-1 (Generate Significant GHG Emissions)

An impact would be considered significant under this threshold if the Project resulted in a substantial net increase in GHG emissions. The analysis for this threshold is twofold:

- Long-Term Operational Effects: The long-term "operational" effect of the Project is the permanent cessation of oil and gas production. This analysis qualitatively describes the GHG emission sources that will be eliminated—including fugitive methane (CH4), stationary combustion of fossil fuels (CO2), and mobile source emissions (CO2)—to determine the Project's overall net effect on long-term emissions.
- Short-Term Decommissioning Emissions: The analysis acknowledges that temporary GHG emissions will occur during the decommissioning and restoration phase from the use of diesel-powered equipment. A precise quantitative estimate of these emissions is speculative for a programmatic EIR, as the exact timing, location, and equipment fleet for each of the hundreds of well abandonments over a 20-year period is unknown. These temporary emissions are assessed qualitatively in the context of the much larger, permanent operational reductions.

Methodology for Threshold GHG-2 (Conflict with Applicable Plans)

This is the primary threshold for evaluating the significance of a policy-level action like the Proposed Project. An impact would be significant if the Project would obstruct or conflict with the implementation of an applicable plan adopted for the purpose of GHG reduction. The analysis evaluates the Project's consistency with the State's and the County's foundational climate

strategies, including CARB's 2022 Scoping Plan, SCAG's Connect SoCal plan, and the General Plan.

A quantitative, model-based analysis (such as with CalEEMod) based on future development buildout is not used because it would be speculative. The Project does not entitle any specific future land uses on the restored sites. Any such future proposals would be considered separate projects and would be subject to their own independent, project-level CEQA review, at which time a quantitative analysis would be appropriate.

5.8.3.2 Project Characteristics

The Revised Oil Well Ordinance is a countywide regulatory initiative that will amend the Los Angeles County Code (Titles 12 and 22, including the Baldwin Hills Community Standards District and the Newhall Ranch Specific Plan) and the County General Plan to prohibit new oil and gas wells and to designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. By the end of that amortization period, these facilities must cease operations and be decommissioned, plugged, and restored in accordance with the Project's established performance standards and relevant State and federal laws. Because the Project is a policy-level action that does not entitle any site-specific development, the characteristics relevant to greenhouse gas (GHG) emissions are the regulatory provisions governing the cessation of oil and gas production, the physical activities required to decommission existing facilities, and the resulting permanent change in operational conditions.

Greenhouse gas-related project characteristics include:

- Prohibition of New Oil and Gas Wells and Facilities: No new oil and gas wells or associated production facilities may be established in any zone in the unincorporated areas, except within the Coastal Zone. This provision prevents the introduction of new, long-term sources of GHG emissions—including fugitive methane (CH4), stationary combustion of fossil fuels (CO2), and mobile-source emissions (CO2)—that would otherwise accompany new oil and gas development.
- Designation of Existing Wells as Nonconforming Uses: Existing, legally established oil wells and production facilities operating without a discretionary land use permit will become legally nonconforming under Section 22.172 of the County Code and will be phased out over a 20-year amortization period. During this period, these facilities must operate in compliance with the Project's performance standards, and operators may voluntarily plug, abandon, and restore their sites at any time, allowing the associated emission reductions to begin in advance of the final amortization deadline.
- Required Decommissioning and Site Restoration: Upon cessation of operations, wells must be plugged and abandoned in accordance with California Geologic Energy Management Division (CalGEM) requirements, associated equipment and pipelines must be removed, and sites must be restored, pursuant to the Project's non-discretionary mandates (PDF-LU-1: Decommissioning and Site Restoration Mandate, and PDF-LU-2: Decommissioning and Infrastructure Removal). These activities generate temporary, short-term GHG emissions—primarily carbon dioxide (CO2) from the combustion of diesel fuel in off-road

equipment, such as workover rigs, excavators, and loaders, and in on-road haul and worker-commute vehicles. Because decommissioning is staggered across hundreds of sites over the 20-year amortization period, these temporary emissions would be intermittent, geographically dispersed, and limited to the active work period at each location.

- Permanent Elimination of Operational Emission Sources: The cessation of oil and gas extraction, processing, and transport permanently eliminates the ongoing operational emissions associated with these facilities. The sources removed include fugitive methane (CH4) from wellheads, valves, connectors, and storage tanks; stationary-combustion carbon dioxide (CO2) from engines, compressors, heaters, and the flaring of excess gas; and mobile-source carbon dioxide (CO2) from the hauling of crude oil and produced water and from employee and contractor trips.
- Implementation of County Climate Policy: The Project includes a General Plan Amendment that revises the Land Use, Conservation and Natural Resources, and Safety Elements to remove policies supporting oil and gas production and to establish the phase-out of existing operations. In doing so, the Project directly executes Measure ES-1 of the County's 2045 Climate Action Plan (Develop a Sunset Strategy for All Oil and Gas Operations)—the County's adopted strategy for reducing GHG emissions—and provides the basis for this analysis.
- Application to All Unincorporated Areas (Except the Coastal Zone): The Project applies throughout the unincorporated areas of Los Angeles County, which span both the South Coast and Antelope Valley Air Basins. Based on CalGEM data as of April 2025, the regulated infrastructure comprises 609 active and 529 idle extraction wells distributed across 337 parcel numbers and approximately 19,064 acres, with the highest concentrations in the Santa Clarita Valley, Metro, Westside, and Gateway Planning Areas and within the Baldwin Hills Community Standards District overlying the Inglewood Oil Field. This infrastructure represents the baseline emission sources that the Project will permanently eliminate.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in a substantial, long-term net reduction in GHG emissions by permanently eliminating the fugitive methane, stationary-combustion, and mobile-source emissions associated with oil and gas production throughout the unincorporated County. While temporary GHG emissions would occur during the decommissioning process—primarily from diesel-powered equipment and haul trucks—these effects would be short-term, geographically dispersed, and minimized through compliance with applicable CalGEM and California Air Resources Board (CARB) requirements.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for greenhouse gas emissions, considering both the temporary emissions generated during decommissioning and the permanent reductions resulting from the cessation of oil and gas production.

5.8.3.3 Impact Analysis

This section evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts related to GHG emissions and climate change, based on the thresholds of significance identified in Section 5.8.2. The Project establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule.

From a GHG emissions standpoint, the Project is expected to result in two primary types of effects:

- Short-Term GHG Emissions: Temporary emissions will occur during the decommissioning and restoration of existing facilities. These emissions will primarily result from the combustion of diesel fuel in heavy equipment, haul trucks, and worker vehicles. Such effects would be intermittent, geographically dispersed, and of limited duration.
- Long-Term GHG Emissions Reductions: The Project will result in the permanent elimination of ongoing operational GHG emissions from the sites. This includes fugitive methane (CH4) from equipment leaks, stationary source carbon dioxide (CO2) from engines and flares, and mobile source CO2 from routine truck and vehicle traffic. These actions would result in a permanent net reduction in the County's overall GHG emissions inventory.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds. The analysis uses a qualitative, plan-based consistency approach that considers both the temporary emissions and the permanent reductions. The analysis also considers the Project's consistency with relevant local, regional, and state GHG reduction plans and climate policies, including the known area of controversy regarding the potential for carbon leakage.

Impact 5.8-1: Would the proposed Project Generate GHG emissions, either directly or indirectly, that may have a significant effect on the environment? [Threshold GHG-1]

Less Than Significant Impact.

The Project would not generate GHG emissions that would have a significant adverse effect on the environment. The temporary, short-term emissions generated during the decommissioning phase are vastly outweighed by the permanent, long-term reductions in GHG emissions resulting from the complete cessation of oil and gas production activities. The Project's overall net effect is a substantial reduction in GHG emissions, which is a beneficial impact.

Short-Term Decommissioning Emissions

The reasonably foreseeable physical activities associated with the Project—the decommissioning and restoration of well sites—will generate temporary, short-term GHG emissions. The primary source of these emissions will be the combustion of diesel fuel in off-road heavy equipment (such as workover rigs, excavators, and cranes) and on-road vehicles (including haul trucks for debris removal and worker commute vehicles). These emissions will consist primarily of carbon dioxide (CO2).

However, these temporary emissions are not considered significant for several reasons. First, they are finite and of limited duration, occurring only during the active work period at each individual site and ceasing permanently upon completion of restoration. Second, these activities will be geographically dispersed across numerous sites throughout the unincorporated County and phased over a 20-year amortization period. This prevents the concentration of emissions in any single location or time period. Finally, decommissioning activities will be subject to stringent state regulations, including the California Air Resources Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation, which mandates the turnover of older, inefficient engines in favor of modern, high-tier equipment, ensuring that even these temporary emissions are minimized.

Long-Term Operational Emissions Reductions

The primary, permanent, and defining effect of the Project is the elimination of the baseline GHG emissions associated with ongoing oil and gas extraction, processing, and transport. The cessation of these industrial operations will result in a substantial and permanent reduction of both carbon dioxide and potent, short-lived climate pollutants like methane. The sources of GHG emissions that will be permanently eliminated include:

- Fugitive Methane (CH4) Emissions: Oil and gas infrastructure is a major source of fugitive methane, a potent GHG with a high global warming potential. The Project will permanently eliminate these emissions from thousands of potential leak points, such as wellheads, valves, connectors, pumps, compressors, and storage tank vents.
- Stationary Combustion (CO2) Emissions: The Project will halt the continuous, on-site combustion of natural gas and diesel fuel used to power engines, compressors, pumps, heaters, and other processing equipment. Emissions from the flaring of excess gas will also be eliminated.
- Mobile Source (CO2) Emissions: The Project will eliminate the routine, ongoing vehicle trips required for operations, including those from heavy-duty trucks hauling crude oil and produced water, as well as the daily commute trips of employees and contractors.

Net Emissions Effect

Consistent with the programmatic findings of the CAP PEIR (Impact 3.9-1), while the Project will result in temporary and minor GHG emissions during decommissioning, these are treated as a necessary, short-term byproduct of implementing the County's decarbonization strategies. These temporary emissions are vastly outweighed by the substantial and permanent GHG reductions achieved through the complete cessation of all oil and gas production activities. The Project's overall net effect is a massive reduction in GHG emissions, which is a beneficial impact that supports local, state, and global efforts to combat climate change. Therefore, the Project would not generate GHG emissions, either directly or indirectly, that may have a significant adverse effect on the environment. The impact is considered less than significant.

Impact 5.8-2: Would the proposed Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. [Threshold GHG-2]

No Impact.

The Project is not only consistent with, but is a direct implementation of, local, regional, and state plans adopted for the purpose of reducing GHG emissions. By prohibiting new oil wells and phasing out existing fossil fuel production, the Project aligns with the core strategies of California's climate policy framework and would not conflict with any applicable plan.

Consistency with State Plans and Policies

The Project is fully aligned with the State of California's comprehensive strategy to transition away from fossil fuels and achieve carbon neutrality:

- CARB 2022 Scoping Plan: The Scoping Plan is California's official blueprint for achieving its 2030 and 2045 GHG reduction targets. A core strategy identified in the plan is the "managed decline of in-state fossil fuel production" to align the state's energy supply with its climate goals. The Project, by prohibiting new drilling and requiring the phase-out of existing production in the nation's most populous county, is a direct local implementation of this statewide strategy.
- Other State Policies: The Project's action on the supply side of fossil fuels is consistent with and complements the State's numerous policies to reduce the demand for petroleum, including the Advanced Clean Cars II and Advanced Clean Trucks regulations, which mandate a transition to zero-emission vehicles, and SB 100, which requires a 100% zero-carbon electricity grid by 2045.

Consistency with Regional and Local County Plans

The Project is a foundational component of the County's own adopted climate and sustainability plans. A project cannot be considered to "conflict" with the plans that it is specifically designed to implement:

- OurCounty Sustainability Plan: The Project directly implements the plan's vision for a "fossil fuel-free LA County," as stated in Goal 1, and supports the transition to a green economy as called for in Goal 4.
- SCAG's 2024 Connect SoCal Plan: The regional plan's primary GHG goal is to reduce VMT. The Project is consistent with this goal by phasing out a VMT-intensive industrial land use, thereby eliminating routine truck hauling and employee commute trips associated with oil production.
- General Plan: The Project includes a General Plan Amendment specifically to ensure internal consistency with the County's primary land use policy document, resolving potential conflicts with older policies that may have supported mineral extraction. Furthermore, the Project is the specific, essential action required to implement Measure ES-1 of the 2045 Climate Action Plan (a component of the General Plan), which explicitly calls for the County to "phase out all oil and gas operations in unincorporated areas." As such, the Project is a cornerstone of the County's adopted climate strategy.

Analysis of Carbon Leakage

A known area of controversy is the issue of "carbon leakage"—the possibility that reducing local oil production could lead to an increase in emissions elsewhere if it is replaced by oil that is more carbon-intensive to extract and transport. However, this potential does not constitute a conflict with GHG reduction plans for CEQA purposes due to California's comprehensive regulatory environment.

- Consistency with State's Master GHG Plan: As noted above, the CARB Scoping Plan has already accounted for the need to phase out in-state production as part of its overall strategy to achieve carbon neutrality. A project that is consistent with the State's master GHG reduction plan cannot be said to conflict with it.
- Statewide Demand Reduction: California's aggressive regulations for zero-emission vehicles and building electrification are designed to systematically reduce the overall state demand for petroleum products. The Project aligns local fossil fuel supply with this planned, state-mandated demand reduction.
- The Low Carbon Fuel Standard (LCFS): The LCFS program serves as a direct regulatory backstop to mitigate leakage. It requires fuel producers to account for the lifecycle carbon intensity of all fuels sold in California, including upstream emissions from extraction and transportation. This market-based mechanism directly disincentivizes the replacement of local oil with more carbon-intensive imports. Notably, the Inglewood Oil Field, which is the unincorporated County's largest production site, has a relatively high carbon intensity (CI) of 10.06 g/MJ due to its extensive energy usage for waterflood operations. Other fields in the unincorporated County have lower carbon intensities, such as Brea-Olinda at 3.59 g/MJ. The carbon intensities for the top foreign sources of crude oil to California are:

Country	Crude Name	CI (g/MJ)	2023 Volume (bbl)
Iraq	Basra Medium	11.78	69,616,036
	Basra Heavy	10.69	1,333,216
Saudi Arabia	Arab Extra Light	9.41	10,503,155
	Arab Light	9.23	38,982,867
	HSFO Crude Blend	11.78	2,412,596
Brazil	Atapu	11.78	980,422
	Bauna	11.78	2,180,526
	Buzios	11.78	482,022
	Frade	5.63	4,739,320
	Iracema (Cernambi)	5.54	5,835,421
	Lapa	11.78	801,589
	Lula (Tupi)	6.24	16,744,296
	Mero	11.78	2,506,882
	Ostra	5.65	998,497
	Peregrino	4.16	669,586
	Sapinhoa	6.00	12,556,870
Ecuador	Napo	8.31	11,938,094
	Oriente	10.07	33,727,582
Guyana	Liza	11.78	7,981,755
	Unity Gold	11.78	24,083,411
Canada	Access Western Blend	15.15	398,158
	Cold Lake	17.87	7,899,383
	Hibernia	11.78	507,234
	Mixed Sweet	8.11	1,022,168
	Namer	11.78	1,033,394
	Syncrude Synthetic (all grades)	31.62	338,453
	Western Canadian Select	19.04	548,821
Colombia	Chaza	11.78	3,982,191

	South Blend	9.25	1,985,914
	Vasconia	9.62	14,698,784

Source: CARB LCFS Crude Sources, 2023

The Project is a direct implementation of the County's own adopted climate and sustainability plans. It is also fully aligned with the strategies of regional and state-level plans, including the CARB Scoping Plan's call for a managed decline of in-state oil production. Therefore, the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions, and there is no impact.

5.8.4 Cumulative Impacts

Cumulative Conditions and Regulatory Framework

Climate change is the result of the accumulation of GHG emissions from all human activities across the globe. As such, the analysis of GHG impacts is inherently a cumulative analysis. The geographic scope for this cumulative impact is the entire planet. Under CEQA, the analysis must determine whether a project's incremental contribution to the significant cumulative impact of global climate change is itself "cumulatively considerable" and therefore a significant impact of the Project.

The CEQA Guidelines provide a specific framework for making this determination. According to CEQA Guidelines Section 15064.4(b), a lead agency may determine that a project's incremental contribution to a cumulative GHG impact is not cumulatively considerable if the project is consistent with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

Project Contribution to Cumulative Impacts

As established in the analysis for Impact 5.8-2, the Proposed Project is not only consistent with but is a direct and essential implementation of the County's own adopted climate and sustainability plans. The Project is the specific action required to implement Measure ES-1 of the County's 2045 Climate Action Plan (CAP), which calls for the phase-out of all oil and gas operations. Furthermore, the Project is fully aligned with the strategies of regional and state-level plans, including the CARB 2022 Scoping Plan's call for a managed decline of in-state oil production. Because the Project is consistent with all applicable GHG reduction plans, its incremental contribution to the cumulative impact of global climate change is not cumulatively considerable.

Moreover, as determined in the analysis for Impact 5.8-1, the Project's net physical effect on the environment is a substantial and permanent reduction in GHG emissions. A project that results in a net decrease in GHG emissions cannot make a considerable contribution to a cumulative increase in global emissions.

Furthermore, this conclusion is directly supported by the CAP PEIR, from which this document tiers. The CAP PEIR explicitly determined that because the CAP (including Measure ES1) is designed to systematically reduce emissions, its implementation 'would result in a cumulatively beneficial impact on GHG emissions and global climate change' (CAP PEIR, p. 4-19). Because the Revised Oil Well Ordinance is the direct regulatory execution of Measure ES1, it inherits and fulfills this cumulatively beneficial outcome. Therefore, the Project's contribution to cumulative GHG impacts is not cumulatively considerable, and the cumulative impact is less than significant.

5.8.5 Level of Significance Before Mitigation

Based on the analysis presented in the preceding sections, all potential GHG impacts resulting from the implementation of the Revised Oil Well Ordinance—both project-level and cumulative—are determined to be less than significant. The Project's primary long-term effect is a net reduction in GHG emissions, and it is fully consistent with all applicable local, regional, and state plans adopted for the purpose of GHG reduction.

Any temporary GHG emissions associated with the decommissioning of existing oil production facilities are expected to be localized, short in duration, and minor in scale compared to the permanent operational reductions achieved by the Project. These temporary emissions are further minimized through the application of mandatory state fleet regulations, which require the use of modern, fuel-efficient equipment.

No potentially significant GHG impacts requiring mitigation were identified.

5.8.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to greenhouse gas (GHG) emissions. The Project's overall effect is a net reduction in GHG emissions, and it is fully consistent with all applicable plans adopted for the purpose of reducing GHGs.

The less-than-significant findings are further supported by the inclusion of Project Design Features (PDFs) that are an integral part of the Project. Specifically, PDF-LU-1 (Decommissioning and Site Restoration Mandate) and PDF-LU-2 (Decommissioning and Infrastructure Removal) legally mandate the permanent cessation of operational energy use and the removal of fossil fuel infrastructure. Furthermore, temporary emissions from decommissioning activities are minimized by existing state regulations governing off-road equipment efficiency and fugitive emissions control. Because the Project does not result in significant impacts to GHG emissions, these PDFs and regulations are not acting as mitigation for this resource topic.

5.8.7 Level of Significance After Mitigation

The Project's impacts related to GHG emissions were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation

remains less than significant. No significant and unavoidable adverse impacts related to GHG emissions would occur because of the Project.

5.8.8 References

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Intergovernmental Panel on Climate Change (IPCC). Sixth Assessment Report (AR6). 2021-2023.

CHAPTER 5.9 HAZARDS AND HAZARDOUS MATERIALS

This section analyzes the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts related to hazards and hazardous materials within the unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would involve the routine transport, use, or disposal of hazardous materials; create a reasonably foreseeable upset condition involving the release of hazardous materials; involve hazardous emissions or materials handling near a school; be located on a hazardous materials site; or interfere with an adopted emergency response or evacuation plan.

The analysis evaluates both the short-term risks associated with the decommissioning and remediation of oil production sites and the long-term beneficial effects of permanently eliminating the hazards associated with active oil and gas operations. Where applicable, the assessment considers the varying levels of risk based on a site's proximity to permitted sensitive uses (such as dwelling units, schools, and hospitals, as defined in Los Angeles County Code Section 22.14.190).

This chapter is organized to present the environmental and regulatory setting relevant to hazards and hazardous materials, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods and assumptions used to assess potential impacts, and the results of the impact analysis.

This analysis draws upon regional and site-specific context from the Initial Study, the County's General Plan (particularly the Safety Element), and relevant Community Standards Districts (CSDs). It is also guided by the extensive federal, state, and local regulatory framework for hazardous materials management, including standards set by the U.S. EPA, the California Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the California Geologic Energy Management Division (CalGEM).

During the public scoping period, the County received comments regarding hazards and hazardous materials. As detailed in Table 2-1: Summary of Scoping Comments Received, commenters, including the City of Culver City and several individuals, raised concerns about a number of issues. These include the potential for contamination from improperly sealed or abandoned wells, the need for thorough site remediation to handle hazardous materials, the potential for increased risk of spills from importing oil via tankers, and health hazards to communities located near oil operations. This chapter considers these comments and evaluates the project's potential to create or expose people to hazards and hazardous materials.

5.9.1 Environmental Setting

5.9.1.1 Regulatory Setting

Federal Regulations

Federal laws establish a nationwide baseline for environmental protection and worker safety that applies to all oil and gas operations, including the decommissioning activities the Project would require.

U.S. Environmental Protection Agency (U.S. EPA)

The U.S. EPA creates rules and enforces federal laws to protect human health and the environment. Several of the laws it administers are directly relevant to the decommissioning and site remediation activities prompted by the Project.

Water Quality Protection (Clean Water Act & Oil Pollution Act)

The federal Clean Water Act (CWA) regulates discharges into the nation's waters. During decommissioning, this requires operators to manage stormwater runoff, often through a Stormwater Pollution Prevention Plan (SWPPP). Additionally, the CWA's Spill Prevention, Control, and Countermeasure (SPCC) rules require facilities to maintain and implement detailed plans to prevent oil spills. The Oil Pollution Act (OPA), an amendment to the CWA, strengthens the U.S. EPA's enforcement authority and a facility's responsibility for contingency planning.

Waste Management (Resource Conservation and Recovery Act - RCRA)

The RCRA provides the "cradle-to-grave" legal framework for managing solid and hazardous waste. The decommissioning activities prompted by the Project will generate various waste materials, including contaminated soils, drilling muds, and dismantled equipment, all of which must be characterized and disposed of according to RCRA standards. While certain oil and gas exploration and production wastes are exempt from RCRA's most stringent hazardous waste rules, they are still regulated as solid waste.

Contaminated Site Cleanup (CERCLA/Superfund)

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, gives the U.S. EPA authority to manage the cleanup of sites contaminated with hazardous substances. CERCLA provides a critical backstop to ensure that legacy contamination at oil and gas sites is addressed, particularly if the responsible party is unable or unwilling to conduct the cleanup. This aligns with the Project's goal of achieving full site remediation.

Occupational Safety and Health Administration (OSHA)

OSHA ensures safe and healthful working conditions for employees. All decommissioning activities prompted by the Project—from well plugging and equipment removal to earthmoving and site restoration—must be conducted in full compliance with OSHA standards. These include regulations for the construction industry (29 C.F.R. 1926) and general industry (29 C.F.R. 1910), which cover hazard communication, personal protective equipment, and the safe operation of heavy machinery. The OSH Act's General Duty Clause broadly requires employers to provide a workplace free from recognized hazards that could cause death or serious physical harm.

Summary of Federal Hazards and Hazardous Materials Considerations

Federal oversight of hazardous materials is comprehensive, establishing a non-discretionary, nationwide framework for environmental protection and worker safety. This framework, administered primarily by the U.S. EPA and OSHA, sets the mandatory minimum standards for all decommissioning activities that will result from the Project, including site remediation (CERCLA), hazardous waste management (RCRA), spill prevention (CWA), and worker protection (OSHA). While these federal laws establish a foundational level of safety, state and local regulations—including the specific requirements of this ordinance—build upon this framework to provide additional, site-specific public health and environmental safeguards.

State Laws, Regulations, and Policies

While federal laws establish a baseline, the primary day-to-day regulation of oil and gas operations, hazardous waste, and worker safety in California occurs at the state level. Several state agencies have overlapping jurisdiction over the decommissioning and site remediation activities that would be prompted by the Project. This state framework establishes detailed technical, safety, and environmental standards for how these activities must be conducted.

California Geologic Energy Management Division (CalGEM)

As the state's primary regulator for oil and gas, CalGEM sets the foundational engineering and safety standards for well operations statewide. Its regulations are designed to protect public health and safety and prevent environmental damage, including the contamination of groundwater. CalGEM's role is particularly critical for the decommissioning phase of the Project.

- Plugging and Abandonment: CalGEM prescribes the detailed technical requirements for permanently plugging and abandoning oil and gas wells. These regulations mandate the placement of cement plugs at specific depths to ensure that all oil, gas, and freshwater zones are permanently isolated from each other and from the surface, preventing future leaks or contamination. All well abandonments under the Project must be approved by CalGEM.
- Idle Well Management: CalGEM has a comprehensive program that requires operators to conduct regular integrity testing on idle wells or to commit to a schedule for their permanent plugging and abandonment. The Project's phase-out mandate ensures a permanent resolution for all idle wells within its jurisdiction.

- Financial Assurance: CalGEM requires operators to post bonds sufficient to cover the full estimated cost of well abandonment and site remediation. This provides a financial backstop to prevent wells from being orphaned.

Department of Toxic Substances Control (DTSC)

The DTSC, a department of the California Environmental Protection Agency, is the state's lead agency for the regulation of hazardous waste and the oversight of contaminated site cleanups. DTSC's role is central to the Project's goal of full site restoration. Any contaminated soils or materials generated during decommissioning must be managed and disposed of as hazardous waste according to DTSC regulations. Furthermore, DTSC provides oversight for the investigation and remediation of properties with significant contamination to ensure they are cleaned up to standards that are protective of human health and the environment, a requirement that is enforced under existing state law.

State and Regional Water Boards

The State Water Resources Control Board (SWRCB) and the Los Angeles Regional Water Quality Control Board (LARWQCB) are responsible for protecting water quality in the state. They have the authority to issue Waste Discharge Requirements (WDRs) for activities that could impact water quality and can issue Cleanup and Abatement Orders (CAOs) to compel an operator to clean up any pollution that threatens surface or groundwater. Their oversight is critical during the site remediation phase to ensure that any soil or groundwater contamination is addressed to meet state water quality objectives.

California Division of Occupational Safety and Health (Cal/OSHA)

As the state counterpart to federal OSHA, Cal/OSHA enforces workplace safety and health regulations that are often stricter than federal standards. Cal/OSHA's role is critical for protecting on-site workers during all decommissioning activities. Relevant regulations include:

- Process Safety Management (PSM): A comprehensive program for facilities that handle large quantities of flammable liquids and gases, like oil fields.
- Injury and Illness Prevention Program (IIPP): A foundational requirement for every California employer to create a site-specific plan to identify and correct workplace hazards.
- Hazard Communication (HazCom): Requires operators to inform and train employees about hazardous chemicals they may encounter.

Recent Complementary Statewide Legislation

Recent legislation passed at the state level reinforces and complements the Project’s goals of protecting public health and ensuring the responsible closure of oil and gas facilities.

- Senate Bill 1137 (2022): Establishes 3,200-foot health protection zones around sensitive receptors like residences and schools, prohibiting new wells and imposing stricter standards on existing operations within these zones.
- Assembly Bill 1866 (2024): Increases fees for idle wells and requires stricter management plans to compel operators to properly close and remediate wells in a timelier manner.
- Assembly Bill 2716 (2024): Specifically targets low-production wells within the Inglewood Oil Field, requiring them to be closed and abandoned by the end of 2030.

- Assembly Bill 3233 (2024): Strengthens and confirms the legal authority of local governments, like the County of Los Angeles, to regulate or prohibit oil and gas operations through their local land use and zoning powers.

Summary of State Hazards and Hazardous Materials Considerations

State agencies provide the primary, hands-on regulatory oversight for all aspects of oil and gas facility closure, site remediation, and worker safety in California. This framework includes detailed technical standards for well plugging and abandonment enforced by CalGEM; mandatory cleanup requirements for contaminated soil and groundwater overseen by DTSC and the Regional Water Boards; and strict worker safety protocols mandated by Cal/OSHA. These state-level requirements are not discretionary and provide an enforceable baseline for all decommissioning and restoration activities that will occur under the Project. Furthermore, recent legislation has confirmed the County's authority to undertake the Project and has strengthened statewide requirements for the timely and responsible closure of oil and gas sites.

Local Regulations

The management of hazards and hazardous materials in unincorporated Los Angeles County is governed by a combination of General Plan policies and specific, enforceable ordinances within the County Code. This framework is designed to ensure land use compatibility, protect public health and safety, prevent environmental contamination, and provide for effective emergency response. The Project itself is a regulatory action designed to amend these codes to further these goals.

County of Los Angeles Code

Various titles of the Los Angeles County Code establish the specific requirements for the safe operation of industrial facilities, the management of hazardous materials, and the protection of public health and the environment.

Title 22 – Planning and Zoning

The County's Zoning Code is the primary tool for regulating land use compatibility. The Project proposes key amendments to this title to prohibit new oil wells and establish performance standards for existing nonconforming wells. In addition to the county-wide ordinance, location-specific overlays provide more stringent rules:

- Community Standards Districts (CSDs): The Baldwin Hills CSD (Chapter 22.310) is a zoning overlay for the Inglewood Oil Field that imposes a layer of rules significantly more stringent than general county-wide requirements. These include enhanced standards for air and noise monitoring, requirements for a Community Advisory Panel, and funding for an independent Environmental Compliance Coordinator to monitor day-to-day operations.

Title 11 – Health and Safety

This title contains specific chapters aimed at abating public safety risks associated with oil wells and related infrastructure. These ordinances require that all hazardous machinery at a well be

securely fenced (Ch. 11.46), that unused oil sumps be cleaned and removed (Ch. 11.48), and that all well openings be properly covered or secured to prevent accidents (Ch. 11.54).

Title 12 – Environmental Protection

This title includes the County's Stormwater and Runoff Pollution Control Ordinance (Ch. 12.80), which prohibits the illicit discharge of pollutants, including hazardous materials, into the County's storm drain system. This is directly applicable to ensuring proper containment during decommissioning activities.

Title 32 – Fire Code

The County Fire Code establishes requirements for fire prevention, emergency access, and the safe storage and handling of flammable and combustible materials. All oil and gas facilities, as well as the decommissioning activities, must comply with Fire Code provisions for fire apparatus access and defensible space.

Building, Utility, and Public Works Codes (Titles 20, 26, 27, 28, 29, 31)

These codes establish the minimum safety standards for all structures, grading, and utility systems. They require building and grading permits for construction and demolition (which must comply with erosion control standards), ensure electrical systems are safe for hazardous locations, and manage industrial waste discharges to the sewer system.

County of Los Angeles General Plan

The General Plan contains the foundational vision and policies for protecting communities from environmental and industrial hazards. The Safety Element is the most relevant component.

- Goal S 6: Reduced risk to the public from hazardous materials.
  - Policy S 6.1: Assess the potential for public health and safety risks associated with existing and proposed oil and gas wells, petroleum pipelines, and production facilities.
- 2045 Climate Action Plan (CAP), part of the General Plan: The CAP's primary strategy to "Decarbonize the Energy Supply" includes Measure ES-1, which calls for the development of a sunset strategy to phase out all oil and gas operations in unincorporated areas.

Summary of Local Hazards and Hazardous Materials Considerations

Los Angeles County's local regulations provide a comprehensive framework for managing industrial hazards and protecting community health and safety. This is achieved through a combination of the General Plan, which sets overarching safety and land use policies, and specific, enforceable ordinances in the County Code that govern everything from land use compatibility and fire safety to public health and stormwater pollution. These local regulations establish the standards that all decommissioning and site remediation activities under the Project must follow. Furthermore, the County's adopted 2045 Climate

Action Plan and OurCounty Sustainability Plan provide the policy goals for the Project, framing the phase-out of oil and gas operations as a key strategy for enhancing public health and environmental justice.

5.9.1.2 Existing Environmental Conditions

The Revised Oil Well Ordinance applies to unincorporated areas throughout Los Angeles County, which include a wide variety of industrial facilities located in diverse land use contexts. Many of these sites, which have been in operation for decades, are now near sensitive land uses, including residential neighborhoods, schools, parks, and healthcare facilities. These facilities represent a baseline of existing industrial hazards and potential environmental contamination that is characteristic of legacy oil and gas production.

Existing Hazardous Materials and Waste Streams

Oil and gas facilities routinely use, store, transport, and generate a variety of hazardous materials and waste streams as part of their daily operations. The primary hazardous materials present at these sites include:

- Crude Oil and Natural Gas: Crude oil is a complex mixture of flammable liquid hydrocarbons. Vapors from crude oil can include flammable and toxic gases, and depending on the geologic formation, the oil may be "sour," meaning it contains highly toxic hydrogen sulfide (H2S) gas. Natural gas, which is primarily methane, is highly flammable and poses a risk of fire and explosion if an uncontrolled release occurs.
- Produced Water: Water that is brought to the surface along with oil and gas is typically a highly saline brine and may contain dissolved hydrocarbons, chemicals used in the production process, and naturally occurring radioactive materials (NORM).
- Operational Chemicals and Wastes: A variety of other chemicals, including corrosion inhibitors, solvents, and acids, may be stored and used on-site. Maintenance and processing activities can also generate hazardous waste, such as contaminated soil and sludge from cleaned-out tanks, which must be managed in accordance with state and federal law.

Existing Hazards and Potential Upset Scenarios

Oil and gas production facilities present inherent hazards due to the nature of the materials and the high-pressure equipment involved. An upset condition is an unplanned event, such as an equipment failure or human error, that could result in the release of hazardous materials. Potential upset scenarios include well blowouts, pipeline and equipment ruptures, and storage tank failures, which can lead to fires, explosions, and significant environmental contamination.

The significance of these potential hazards is elevated by the proximity of many facilities to sensitive populations. In areas like the Inglewood Oil Field, West Carson, and the Gateway communities, oil facilities are located immediately adjacent to residences, schools, and major transportation corridors, placing these populations within the potential impact zone of an accidental release.

Known Contamination and Public Database Review

Historical oil production practices, which were subject to less stringent environmental regulations than exist today, have resulted in environmental contamination at some sites. A review of public regulatory agency databases identifies known sites of contamination within the Project Area:

The EnviroStor database, maintained by the Department of Toxic Substances Control (DTSC), lists several properties within active oil fields for investigation or cleanup related to historical spills or disposal practices. Specifically, the EnviroStor database lists 8 sites located on parcels in the unincorporated County that also contain oil & gas operations. The most common potential contaminants identified in this dataset are:

- Diesel, Gasoline, and Motor Oil
- Halogenated Solvents
- Chromium VI

The GeoTracker database, maintained by the State Water Board, tracks numerous cases associated with oil and gas facilities, typically related to surface spills of crude oil that have required remediation under the oversight of the Los Angeles Regional Water Quality Control Board (LARWQCB). Specifically, the GeoTracker database lists 47 sites located on parcels in the unincorporated County that also contain oil & gas operations. The most common potential contaminants identified in this dataset are:

- Diesel and Gasoline
- Benzene
- Total Petroleum Hydrocarbons (TPH) and Tetrachloroethylene (PCE)
- Crude Oil and Waste Oil
- Lead
- Trichloroethylene (TCE)

A significant existing hazard is the presence of numerous "likely orphaned" or long-term idle wells identified by CalGEM. These wells may lack a viable operator and pose a persistent risk of leaking methane (an explosion hazard) or other fluids that can contaminate soil and groundwater.

Project's mandate for phase-out and decommissioning is intended to prevent currently active wells from becoming future orphan well liabilities.

5.9.2 Thresholds of Significance

Consistent with the CEQA Guidelines Appendix G, Environmental Checklist, and County practice, the Project would have a significant impact to hazard and hazardous materials if it would:

HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.

HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

5.9.3 Environmental Impacts

5.9.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the long-term phase-out of fossil fuels is beneficial for public safety but explicitly acknowledged that the physical decommissioning of existing facilities would require heavy equipment and could require soil and groundwater remediation to address existing contamination, resulting in short-term hazards (CAP PEIR, 3.8-15 to 3.8-16). Therefore, this programmatic analysis evaluates the incremental short-term impacts of ROWO's decommissioning and remediation activities. Because these temporary activities are strictly governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with existing local, state, and federal hazardous materials regulations, this analysis focuses on demonstrating how these existing frameworks ensure any short-term hazard impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The evaluation of impacts related to hazards and hazardous materials is based on a regulatory and risk-based assessment. This analysis uses established safety principles to evaluate potential changes to the existing risk profile for the public and the environment resulting from the implementation of the Revised Oil Well Ordinance. The methodology focuses on the Project's compliance with the extensive regulatory framework governing hazardous materials and its net effect on public and environmental safety.

This assessment is based on a qualitative review of existing conditions and the reasonably foreseeable physical activities associated with decommissioning and site remediation. It considers:

- The types and quantities of hazardous materials currently used, stored, and transported in association with existing oil and gas sites.
- The existing potential for upset and accident conditions (e.g., spills, fires, explosions) and the proximity of these risks to sensitive uses, such as homes and schools.
- The presence of known contaminated sites as identified in public regulatory databases, including DTSC's EnviroStor and the State Water Board's GeoTracker.
- The short-term risks associated with the physical activities of decommissioning, including well plugging, demolition, excavation of contaminated soil, and the transport of hazardous waste.
- The long-term effects of permanently removing industrial hazards from communities.

Key sources of information include:

- The comprehensive federal, state, and local regulatory framework for hazardous materials, including standards set by the U.S. EPA, OSHA, CalGEM, DTSC, and the RWQCB.
- The County of Los Angeles General Plan (particularly the Safety Element) and County Code (Titles 11, 22, 26, and 32).
- The Project Description, including its Project Design Features (PDFs), and the Initial Study.
- Prior CEQA documents for existing oil fields, including the Baldwin Hills CSD.
- Aerial imagery and GIS data showing oil well locations and their proximity to sensitive land uses.

This methodology is consistent with CEQA Guidelines Appendix G and focuses on comparing the Project's managed, temporary decommissioning risks against the permanent elimination of long-term operational hazards to determine whether the Project would result in a substantial adverse effect on the public or the environment.

5.9.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22), including the Baldwin Hills Community Standards District (CSD) and Newhall Ranch Specific Plan, and the County General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once the amortization period ends, oil production facilities must cease operations and be decommissioned in accordance with established performance standards. Key hazard-related Project characteristics include:

- Elimination of New Hazardous Materials Sites:
  No new oil and gas production facilities will be permitted in unincorporated areas. This prevents the introduction of new industrial sites that would routinely use, store, and transport large quantities of hazardous and flammable materials, thereby avoiding the creation of new, long-term risks to public health and the environment.

- Mandatory Decommissioning and Remediation of Existing Sites:

Upon cessation of operations, all facilities must be decommissioned. This includes the permanent plugging and abandonment of wells to CalGEM standards, the removal of all associated equipment and infrastructure, and the remediation of any contaminated soil and groundwater to the strictest applicable health-based standards.

- Inclusion of Enforceable Health and Safety Standards (PDFs):
  The Project includes a comprehensive suite of mandatory performance standards that function as Project Design Features to ensure decommissioning is conducted safely and protects public health. These include:
  - PDF-HAZ-1 (Financial Assurance): Requires operators to post sufficient bonds to cover the full cost of well plugging and abandonment.
  - PDF-HAZ-2 (Community Health, Safety, and Notification Plans): Mandates operators prepare a comprehensive health and safety plan to the satisfaction of the Department of Public Health.

- Cessation of Routine Hazardous Materials Transport and Use:
  The phase-out will permanently end the routine transport of crude oil and produced water by truck and pipeline, as well as the ongoing use of various operational chemicals. This reduces the long-term potential for spills and accidental releases on public roads and at the sites.

- Application Near Sensitive Uses:
  The Revised Oil Well Ordinance applies across a broad geographic area where oil infrastructure is often located near homes, schools, parks, and healthcare facilities. The most pronounced public health and safety benefits are expected in communities with oil operations in close proximity to these sensitive uses.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in a long-term, significant beneficial impact by permanently removing existing industrial hazards and ensuring the cleanup of legacy contamination. While temporary, managed risks will be present during the decommissioning process—such as the handling of hazardous waste and the excavation of contaminated soil—these activities are governed by the Project's enforceable health and safety standards and the comprehensive existing regulatory framework.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for hazards and hazardous materials.

5.9.3.3 Impact Analysis

The Project establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as a nonconforming use and required to cease operations in accordance with a phased 20-year amortization schedule. The

Project also includes enforceable performance standards for site maintenance, well abandonment, bonding, site remediation, and community safety, which apply throughout the decommissioning process. From a hazards standpoint, the Project is expected to result in two primary types of effects:

- Short-Term Managed Risks: Temporary risks will be present during the decommissioning and remediation of existing facilities. These activities may include the handling of hazardous materials, excavation of contaminated soil, well plugging operations, and the transport of hazardous waste. These risks are managed through a comprehensive regulatory framework and the Project's built-in safety standards.
- Long-Term Beneficial Effects: The Project will result in the permanent elimination of long-term operational hazards. This includes removing the risk of well blowouts, pipeline ruptures, major spills, and chronic community exposure to emissions from active oil and gas sites. These actions would permanently improve public health and safety in affected areas.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds identified in the Initial Study. The analysis considers both the temporary, managed risks and the permanent, beneficial effects of implementation, using a qualitative, risk-based approach to determine the Project's net effect on public safety and the environment.

Impact 5.9-1: Would the proposed Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? [Threshold HAZ-1]

Less Than Significant Impact.

The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The Project's primary long-term effect is the elimination of the routine, ongoing transport and use of hazardous materials associated with oil production. The short-term handling and disposal of hazardous waste during the decommissioning phase is a temporary activity that is strictly governed by existing federal, state, and local regulations.

Long-Term Operational Effects (Elimination of Routine Hazards)

The baseline condition at the Project sites involves the routine, long-term transport, use, and disposal of hazardous materials. Active oil and gas operations require the ongoing transport of crude oil and produced water via truck and pipeline, the continuous on-site use and storage of flammable and toxic petroleum products and operational chemicals, and the regular generation and disposal of hazardous waste streams.

The Project's primary effect is to permanently cease these activities. By phasing out all oil and gas operations, the Project will eliminate the routine, daily and weekly transport of hazardous materials on public roads and the continuous presence of these materials in communities. This represents a significant long-term beneficial impact by permanently removing these routine operational hazards to the public and the environment.

Short-Term Decommissioning Activities

The decommissioning phase of the Project will involve the one-time transport and disposal of hazardous materials and waste generated during site cleanup. This will include the removal of dismantled, contaminated equipment; sludge from cleaned-out tanks; and potentially large volumes of excavated soil contaminated with hydrocarbons.

While these activities involve hazardous materials, they are temporary and not "routine" in the operational sense. Furthermore, they are strictly governed by a comprehensive regulatory framework designed to protect public safety and the environment. All handling, transport, and disposal of hazardous waste must be conducted in strict compliance with:

- U.S. EPA and DTSC regulations under the Resource Conservation and Recovery Act (RCRA), which provides a "cradle-to-grave" framework for hazardous waste management. This requires that all waste be properly characterized, manifested, transported by licensed haulers, and delivered to a permitted disposal facility capable of safely handling the specific waste type.
- U.S. Department of Transportation (DOT) and California Highway Patrol (CHP) regulations for the packaging, labeling, and transport of hazardous materials on public roadways.
- Project Design Feature PDF-HAZ-2 (Community Health, Safety, and Notification Plans), which requires the preparation of a comprehensive plan to protect the public during potentially hazardous activities.

Consistent with the programmatic findings of the CAP PEIR, because the Project replaces a permanent system of routine hazardous materials handling with a temporary, highly regulated process for final site cleanup, the impact is considered less than significant.

Impact 5.9-2: Would the proposed Project Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? [Threshold HAZ-2]

Less than Significant Impact.

The Project does not create a significant hazard from accidents or upset conditions. It has a beneficial long-term impact by permanently eliminating the risk of major operational accidents, like well blowouts or pipeline ruptures. The temporary risks during the decommissioning process are minimized to a less than significant level through a robust framework of safety regulations and the Project's own enforceable standards.

Elimination of Long-Term Accident Risk

The baseline condition at the Project sites involves a continuous, long-term risk of high-consequence industrial accidents. Active oil facilities present inherent hazards from flammable materials and high-pressure equipment, including the potential for well blowouts, pipeline ruptures, and storage tank failures. The

Project's primary effect is to permanently eliminate these significant operational hazards, particularly at sites located near homes and schools. This is a major benefit to public safety.

Management of Short-Term Decommissioning Risk

The decommissioning phase involves activities with the potential for smaller-scale, short-term accidents, such as a release of materials during tank cleaning or soil excavation. However, these temporary risks are managed through multiple, overlapping layers of safety protocols.

All decommissioning work must comply with strict state safety regulations, including CalGEM technical standards for maintaining well control during plugging and Cal/OSHA worker safety rules for handling hazardous materials.

The key safeguard is a mandatory component of the Project itself:

- Project Design Feature PDF-HAZ-2 (Community Health, Safety, and Notification Plans) requires that, before any work begins, every operator must prepare a comprehensive safety plan that must be reviewed and approved by the County's Department of Public Health. This ensures that all site-specific risks are identified and that robust, enforceable protective measures are in place to manage them.

Consistent with the CAP PEIR, because the Project replaces a significant, permanent risk of major operational accidents with a temporary, highly regulated risk during final site cleanup, the impact is less than significant.

Impact 5.9-3: Would the proposed Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? [Threshold HAZ-3]

Less than Significant Impact.

The Project will not create a significant hazard for schools. It has a long-term beneficial impact by permanently removing existing oil and gas operations from the vicinity of schools. The temporary, short-term risks during decommissioning are minimized to a less than significant level through strict regulatory compliance and the Project's enforceable safety plans.

Long-Term Elimination of Hazards Near Schools

The existing environmental conditions include numerous active and idle oil and gas facilities located within one-quarter mile of schools in unincorporated Los Angeles County. These facilities represent a continuous, long-term potential hazard to students and staff due to the routine presence of hazardous materials and the risk of accidental releases or hazardous air emissions.

The Project's primary effect is the permanent elimination of these industrial hazards from the vicinity of schools. By phasing out all oil and gas operations, the Project removes the baseline risk of operational accidents and chronic exposure, which is a significant, permanent benefit to the health and safety of students and staff.

Management of Short-Term Risks Near Schools

Decommissioning activities will involve the temporary handling of hazardous materials and could generate short-term emissions (e.g., diesel exhaust, dust from soil excavation) near some schools. However, these temporary risks are managed through multiple layers of safety regulations and Project-specific requirements.

Any emissions are subject to air district rules, such as SCAQMD Rule 1166, which sets strict dust control, monitoring, and notification requirements for the excavation of contaminated soil.

Most importantly, the Project's own design ensures protection for schools. Project Design Feature PDF-HAZ-2 (Community Health, Safety, and Notification Plans) is especially critical for sites near sensitive uses. It mandates that operators develop site-specific safety plans, approved by the Department of Public Health, that include measures to protect students and staff (such as dust control, traffic management, and emergency protocols) during all work.

Consistent with the CAP PEIR, because the Project replaces a permanent potential hazard near schools with a temporary, highly managed cleanup process, the impact is less than significant.

Impact 5.9-4: Would the proposed Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? [Threshold HAZ-4]

Less than Significant Impact.

Government Code Section 65962.5 requires the compilation of various lists of known hazardous materials sites, collectively referred to as the 'Cortese List.' As described in Section 5.9.1.2, a review of public regulatory databases (EnviroStor and GeoTracker) identifies several known cleanup sites associated with legacy oil operations within the unincorporated County.

However, the Project does not authorize new development or the construction of structures for human occupancy on these sites. Instead, the Project's non-discretionary mandates (PDF-LU-1 and PDF-LU-2) legally require the decommissioning and site restoration of these facilities. To ensure that legacy contamination is safely addressed during this process, any decommissioning and remediation activities will be subject to mandatory compliance with existing state and local regulations, including oversight by the Department of Toxic Substances Control (DTSC), the Regional Water Quality Control Board (RWQCB), and the County Fire Department. These existing regulatory frameworks mandate the preparation of Phase I and, if necessary, Phase II Environmental Site Assessments (ESAs) to identify recognized environmental conditions, as well as the implementation of approved Soil and Groundwater Management Plans prior to significant earth-moving activities. Because the Project compels the safe remediation and closure of these sites pursuant to these existing legal frameworks rather than project-specific mitigation, it would not create a significant hazard to the public or the environment. Therefore, the impact is less than significant.

Impact 5.9-5: Would the proposed Project, if located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area? [Threshold HAZ-5]

Less than Significant Impact.

The Project would not result in a safety hazard for people residing or working in an area subject to an airport land use plan. This threshold evaluates whether a project would create a safety hazard related to airport operations. Such hazards typically involve creating physical obstructions in flight paths, generating glare or visual interference for pilots, or creating wildlife attractants (e.g., bird strike hazards).

A review of airport land use plans and the locations of the facilities subject to the Project indicates that only one parcel (3201004013) is located within an airport influence area. This parcel contains a single idle ancillary well and is located within the airport influence area for Fox Airfield in the Antelope Valley.

The Project requires the decommissioning and removal of this idle well. The physical activities associated with this work involve the temporary use of ground-level equipment that would not be of sufficient height to penetrate navigable airspace or create an obstruction for aircraft. The Project does not create any new structures, water features, or lighting that could interfere with flight operations. The removal of the industrial infrastructure from this parcel is a neutral to beneficial action from an airport land use compatibility perspective.

Because the Project's activities are limited to the temporary decommissioning and permanent removal of a single idle well and do not create a flight-related safety risk, the impact is less than significant.

Impact 5.9-6: Would the proposed Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? [Threshold HAZ-6]

Less than Significant Impact.

The Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

The Project’s decommissioning activities may require the use of heavy trucks and equipment, which could cause temporary and intermittent traffic on local roads providing access to the sites. However, these activities will not require the permanent closure of any public roadways designated as emergency evacuation routes. Any temporary lane closures or work within the public right-of-way would require a permit from County Public Works and if applicable, Caltrans. This process requires the operator to submit and implement a traffic control plan that ensures emergency vehicle

access is maintained at all times. Therefore, the Project will not physically interfere with an adopted emergency evacuation plan.

Furthermore, the Project's long-term effect is beneficial to emergency response. By permanently removing industrial oil and gas facilities, the Project eliminates a potential source of major hazardous materials incidents, such as fires or well blowouts, that would otherwise require a significant and specialized emergency response from agencies like the Los Angeles County Fire Department. During the temporary decommissioning phase, operators will be required to comply with all Fire Code regulations and provide adequate access for emergency responders. The Community Health, Safety, and Notification Plans (PDF-HAZ-2) will also include procedures for on-site emergencies and coordination with local emergency services.

Because temporary traffic impacts will be managed to maintain emergency access and the Project's long-term effect is to reduce the potential need for hazardous materials emergency response, the impact is less than significant.

5.9.4 Cumulative Impacts

This section evaluates whether the Project, when considered in combination with other past, present, or reasonably foreseeable future projects, would result in a cumulatively considerable impact via hazards and hazardous materials, as defined in CEQA Guidelines Section 15130.

Cumulative Conditions in Los Angeles County

The cumulative context for hazards and hazardous materials includes the thousands of sites throughout Los Angeles County that use, store, transport, and dispose of hazardous substances. Continued industrial and commercial development in the region could increase the number of these sites, incrementally adding to the overall regional risk of accidental releases and placing a continued burden on emergency response services.

Project Contribution to Cumulative Impacts

The Project's incremental contribution to this cumulative condition is not considerable; in fact, its contribution is beneficial. The Project does not add to the cumulative number of hazardous sites. Instead, its primary action is to remove hundreds of existing industrial oil and gas facilities from the regional inventory over a 20-year period.

By permanently eliminating these sites, the Project reduces the overall regional risk profile. It lowers the probability of a major industrial accident involving hazardous materials and lessens the long-term potential strain on specialized emergency services, such as the Los Angeles County Fire Department's hazardous materials response teams. The short-term risks associated with the temporary decommissioning activities are site-specific and managed through mandatory

regulatory compliance and the Project's own health and safety standards (PDF-HAZ-2), ensuring they do not contribute significantly to the regional cumulative hazard burden.

Because the Project results in a net reduction of hazardous materials sites in the region, its contribution to cumulative impacts is beneficial, not adverse. Therefore, the Project's cumulative impact related to hazards and hazardous materials is less than significant.

5.9.5 Level of Significance Before Mitigation

Based on the analysis provided in this chapter, all potential impacts related to hazards and hazardous materials resulting from the implementation of the Revised Oil Well Ordinance are determined to be less than significant. The Project's primary long-term programmatic effect is beneficial, as it permanently removes industrial hazards from communities. Any temporary, short-term hazards to construction workers, the public, and the environment associated with the physical implementation of decommissioning activities—specifically the excavation, handling, and transport of soils potentially contaminated by decades of legacy oil production—are minimized to a less than significant level through mandatory compliance with existing comprehensive federal, state, and local regulations (including DTSC and RWQCB oversight), as well as the Project's own enforceable Project Design Features (PDFs). No potentially significant impacts requiring mitigation were identified.

5.9.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to hazards and hazardous materials. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs)—specifically PDF-HAZ-1 (Financial Assurance) and PDF-HAZ-2 (Community Health, Safety, and Notification Plans)—that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks governing hazardous waste and site remediation. Because the Project does not result in significant impacts to hazards and hazardous materials, no CEQA mitigation measures are necessary.

5.9.7 Level of Significance After Mitigation

The Project's impacts related to hazards and hazardous materials were determined to be less than significant without the need for mitigation measures. Therefore, the level of significance after mitigation remains less than significant.

5.9.8 References

Federal Agencies and Regulations

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, as amended. 42 U.S.C. § 9601 et seq.

Occupational Safety and Health Administration (OSHA). General Industry Regulations (29 CFR 1910) and Construction Industry Regulations (29 CFR 1926).

Resource Conservation and Recovery Act (RCRA) of 1976. 42 U.S.C. § 6901 et seq.

United States Environmental Protection Agency (U.S. EPA). Clean Water Act (CWA) and Oil Pollution Act (OPA). 33 U.S.C. § 1251 et seq.

United States Environmental Protection Agency (U.S. EPA). Spill Prevention, Control, and Countermeasure (SPCC) Rule. 40 CFR Part 112.

State of California Agencies, Regulations, and Policies

California Department of Toxic Substances Control (DTSC). EnviroStor Database. Accessed 2025. https://www.envirostor.dtsc.ca.gov/public/

California Division of Occupational Safety and Health (Cal/OSHA). Title 8 of the California Code of Regulations (including Process Safety Management and Injury and Illness Prevention Program requirements).

California Geologic Energy Management Division (CalGEM). California Laws for Conservation of Petroleum and Gas (Public Resources Code, Division 3) and California Code of Regulations, Title 14, Division 2.

California Legislature. Assembly Bill 1866 (2024): Oil and gas: idle wells.

California Legislature. Assembly Bill 2716 (2024): Oil and gas: low-production wells: Inglewood Oil Field.

California Legislature. Assembly Bill 3233 (2024): Local Environmental and Public Health Protection Act.

California Legislature. Senate Bill 1137 (2022): Oil and gas: operations: location restrictions.

California State Water Resources Control Board (SWRCB) and Los Angeles Regional Water Quality Control Board (LARWQCB). GeoTracker Database. Accessed 2025. https://geotracker.waterboards.ca.gov/

Government Code Section 65962.5 (Cortese List).

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Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

Los Angeles County Department of Regional Planning. Final Environmental Impact Report for the Baldwin Hills Community Standards District. Prepared by Marine Research Specialists, 2008.

Los Angeles County Department of Regional Planning. Los Angeles County General Plan 2035, including the Safety Element. Adopted October 2015.

Los Angeles County Department of Regional Planning. Revised Oil Well Ordinance Initial Study. March 2025.

Los Angeles County. OurCounty Sustainability Plan. Adopted August 2019.

Los Angeles County Code:

- Title 11 – Health and Safety
- Title 12 – Environmental Protection
- Title 22 – Planning and Zoning (including Chapter 22.310, Baldwin Hills Community Standards District)
- Title 26 – Building Code
- Title 32 – Fire Code

Other Sources

Los Angeles County Airport Land Use Commission. General William J. Fox Airfield Airport Land Use Compatibility Plan.

Aerial imagery and GIS datasets from the County of Los Angeles, California Department of Conservation, and California State Geoportal.

CHAPTER 5.10 HYDROLOGY AND WATER QUALITY

This section analyzes the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to hydrology and water quality within unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would result in adverse effects such as violating water quality standards; substantially depleting groundwater or interfering with recharge; altering drainage patterns in a manner that causes erosion, siltation, or flooding; or exposing people or structures to flood hazards.

The analysis evaluates both the short-term impacts associated with the decommissioning and site remediation of oil production facilities and the long-term beneficial outcomes of eliminating potential sources of surface and groundwater contamination. Where applicable, the assessment considers the context of sites located within floodplains, near sensitive water bodies, or above critical groundwater basins.

This chapter is organized to present the environmental and regulatory setting relevant to hydrology and water quality, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods and assumptions used to assess potential impacts, and the results of the impact analysis.

This analysis draws upon site-specific and regional context information contained in the Initial Study, the County's General Plan, and relevant Community Standards Districts (CSDs), as well as CEQA Appendix G thresholds. It is also guided by the extensive regulatory framework for water resource protection, including the federal Clean Water Act, the state Porter-Cologne Water Quality Control Act, and oversight from agencies such as the Regional Water Quality Control Board (RWQCB) and the California Geologic Energy Management Division (CalGEM).

Comments related to hydrology and water quality were submitted during the public scoping period. As summarized in Table 2-1: Summary of Scoping Comments Received, commenters expressed concern about the contamination of surface water and springs from existing, improperly sealed wells, as well as the potential for polluted stormwater runoff from the future redevelopment of the sites. The risk of oil spills in coastal waters from a potential increase in tanker traffic was also noted. The analysis in this chapter is responsive to these comments and evaluates the potential effects of the project on water resources.

5.10.1 Environmental Setting

5.10.1.1 Regulatory Setting

Federal Regulations

Although the California Environmental Quality Act (CEQA) is a state-level statute, a comprehensive framework of federal laws and regulations establishes the primary, nationwide standards for the protection of water resources. These federal frameworks influence how water quality, wetlands, stormwater runoff, and pollutant discharges are managed, especially in cases where federal lands, funding, or permits are involved. The following federal regulations are relevant to the analysis of hydrology and water quality impacts under CEQA, particularly as they apply to the decommissioning and site remediation activities prompted by the Project.

Safe Drinking Water Act

The federal Safe Drinking Water Act (SDWA), enacted in 1974, protects public health by authorizing nationally enforceable standards for drinking water quality. The SDWA gives the U.S. Environmental Protection Agency (U.S. EPA) the authority to set drinking water standards, such as the National Primary Drinking Water Regulations. These regulations protect drinking water quality by limiting the levels of specific contaminants that can adversely affect public health. All public water systems are required to satisfy these legally enforceable standards, known as Maximum Contaminant Levels (MCLs), and must monitor for these contaminants and report to the U.S. EPA.

The SDWA is relevant to the Proposed Project because oil and gas operations have the potential to contaminate underground sources of drinking water. The decommissioning activities required by the Project, particularly the proper plugging of wells under CalGEM oversight, are critical for protecting these drinking water aquifers from potential contamination by oil, gas, or saline produced water. Furthermore, the SDWA authorizes the Underground Injection Control (UIC) program, which specifically regulates the subsurface injection of fluids to prevent the endangerment of drinking water sources. This program is directly applicable to oil and gas operations that use injection wells for disposal or enhanced recovery, underscoring the federal importance of protecting the groundwater resources that the Project will help safeguard.

Clean Water Act

The federal Water Pollution Control Act, commonly known as the Clean Water Act (CWA), is the principal statute governing water quality in the United States. The CWA establishes the basic structure for regulating the discharge of pollutants into the Waters of the United States and gives the U.S. EPA the authority to implement pollution control programs, such as setting wastewater standards for industry. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters unless a permit is obtained. Section 402 of the CWA requires a National Pollutant Discharge Elimination System (NPDES) permit for all point source discharges. Under Section 401, any

applicant for a federal license or permit that may result in a discharge must obtain a state-level certification declaring that the discharge will comply with all applicable water quality standards.

The CWA is highly relevant to the physical activities required by the Proposed Project. Specifically, the ground-disturbing activities associated with decommissioning and site restoration on sites larger than one acre are subject to the requirements of the NPDES Construction General Permit. This permit requires the operator to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), which must include Best Management Practices (BMPs) to control erosion and prevent sediment and other pollutants from entering surface waters during the work. Additionally, if any decommissioning work, such as the removal of a pipeline or the restoration of a stream bank, requires the discharge of fill material into a federally protected water body, a Section 404 permit from the U.S. Army Corps of Engineers and a corresponding Section 401 Water Quality Certification from the Regional Water Board would be required.

National Pollutant Discharge Elimination System

Under the National Pollutant Discharge Elimination System (NPDES) program, promulgated under Section 402 of the CWA, all facilities that discharge pollutants from any point source into Waters of the United States are required to obtain an NPDES permit. Point sources include discharges from industrial facilities and discharges associated with urban runoff. The NPDES program has a variety of measures designed to minimize and reduce pollutant discharges. All construction sites one acre or more in size must file for and obtain an NPDES permit. The U.S. EPA's Storm Water Phase II Final Rule requires operators of regulated small municipal separate storm sewer systems (MS4s), such as the County, to implement programs to reduce pollutants in post-construction runoff from new development and redevelopment projects.

The NPDES program is directly applicable to the decommissioning and site restoration activities required by the Proposed Project. Under the Industrial Storm Water Program, any Project-related land disturbance of one acre or more is subject to the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). To obtain coverage under this permit, the site operator must prepare and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify all potential pollutant sources and specify the Best Management Practices (BMPs)—such as silt fences, fiber rolls, and stabilized construction entrances—that will be used to control erosion, manage sediment, and prevent the discharge of pollutants into the storm drain system and receiving waters.

Summary of Federal Hydrology and Water Quality Considerations

The federal government provides a foundational regulatory framework for protecting the nation's water resources. This is primarily achieved through the Clean Water Act (CWA), which governs pollutant discharges and stormwater runoff, and the Safe Drinking Water Act (SDWA), which sets standards to protect groundwater and drinking water supplies. These federal laws are directly applicable to the Project's decommissioning activities. The NPDES permit program, under the CWA, is the primary mechanism that will regulate stormwater runoff from the sites, requiring the

implementation of a Stormwater Pollution Prevention Plan (SWPPP) to protect surface water quality. This federal framework establishes the baseline standards for environmental protection that all site restoration and remediation work under the Project must meet.

State Regulations

While federal law provides a nationwide baseline, California has a comprehensive and often more stringent regulatory framework for the protection of surface water and groundwater. The cornerstone of the State's water quality law is the Porter-Cologne Water Quality Control Act, which grants broad authority to the State Water Resources Control Board (SWRCB) and its nine regional boards.

For the Project Area, the Los Angeles Regional Water Quality Control Board (LARWQCB) is the primary agency responsible for implementing and enforcing water quality standards. The regulations and oversight provided by these State agencies are directly applicable to the decommissioning activities required by the Project, particularly with respect to the cleanup of contaminated soil and the protection of groundwater resources.

California Safe Drinking Water Act

The California Safe Drinking Water Act (CSDWA), first established in 1976 and found in the California Health and Safety Code, is the primary state law for regulating drinking water quality. It establishes a framework for the protection of public health that is often more stringent than the federal SDWA. The CSDWA is implemented by the State Water Resources Control Board's Division of Drinking Water (DDW), which has the authority to establish state-specific Maximum Contaminant Levels (MCLs) for contaminants in public water systems.

The CSDWA is relevant to the Proposed Project because numerous oil and gas facilities are located above or adjacent to groundwater basins that serve as sources for public drinking water systems. The Act sets the legally enforceable standards that these drinking water sources must meet. Therefore, the decommissioning activities required by the Project directly support the goals of the CSDWA by permanently eliminating potential sources of contamination. The proper plugging of wells under CalGEM oversight and the cleanup of any soil or groundwater contamination under RWQCB oversight are critical actions that serve to protect these vital drinking water resources from pollutants associated with oil and gas operations.

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Sections 13000 et seq.) is the basic water quality control law for California and establishes a regulatory program to protect water quality and the beneficial uses of state waters. Under this Act, the State Water Resources Control Board (SWRCB) has ultimate authority over state water rights and water quality policy. The State is divided into nine regions, and the SWRCB, through its nine Regional Water Quality Control Boards (RWQCBs), carries out the regulation and protection of water quality in each region. Each regional

board is required to adopt a Water Quality Control Plan, or Basin Plan, that establishes the specific water quality objectives necessary to protect the beneficial uses of the region's ground and surface waters. Most of the Project Area is within the jurisdiction of the Los Angeles Regional Water Quality Control Board (Region 4).

The Porter-Cologne Act is of critical importance to the Proposed Project. The LARWQCB provides direct regulatory oversight for site remediation activities. The Water Quality Objectives established in the Basin Plan are the legal standards that any soil or groundwater cleanup at a decommissioned oil and gas site must achieve. Under the Act, the LARWQCB has the authority to issue enforcement actions, such as Cleanup and Abatement Orders, to ensure that any contamination from historical operations is fully remediated.

Furthermore, the SWRCB issues the statewide NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ). This permit is directly applicable to all Project-related decommissioning sites that disturb one acre or more and requires the implementation of a Stormwater Pollution Prevention Plan (SWPPP) to control pollutants in runoff.

California Water Code

The California Water Code authorizes various districts and local agencies to manage surface and groundwater resources. Many of these agencies have statutory authority to exercise some form of groundwater management. For example, a Water Replenishment District is authorized to establish groundwater replenishment programs, while a Water Conservation District can levy groundwater extraction fees. Through special acts of the Legislature, some local agencies have been granted greater authority to manage groundwater, including the ability to limit extraction upon evidence of overdraft.

The California Water Code is relevant to the Project as it establishes the local agencies responsible for managing the water resources that the Project's activities will ultimately protect. By requiring the permanent and secure plugging of all oil and gas wells, the Project prevents potential pathways for the contamination of groundwater aquifers. This directly supports the mission of local agencies, such as water replenishment and conservation districts, in their efforts to manage and protect the quality of the region's vital groundwater supplies.

Human Right to Water Law (AB685)

Enacted in 2012, Assembly Bill 685 amended the California Water Code to formally declare that "every human being has the right to safe, clean, affordable, and accessible water." This law establishes a guiding policy for the state, directing all relevant agencies, including the State Water Resources Control Board, to consider this human right when revising, adopting, or implementing their policies, regulations, and grant programs.

This state policy is relevant because the Project directly supports and helps implement the Human Right to Water. By phasing out an industrial land use that poses a risk of contaminating drinking water sources, the Project actively works to protect and preserve the safety of those resources for human consumption. The Project's requirements for the proper plugging of wells (which prevents the contamination of drinking water aquifers) and the mandatory remediation of any existing soil and groundwater contamination are concrete actions that uphold the principles of AB 685.

Summary of State Hydrology and Water Quality Considerations

California's state regulations provide the primary, direct oversight for protecting water resources from the potential impacts of industrial activities. The cornerstone is the Porter-Cologne Water Quality Control Act, which gives the Los Angeles Regional Water Quality Control Board (LARWQCB) the authority to establish the specific cleanup standards that all site remediation under the Project must meet and to enforce those standards through mechanisms like Cleanup and Abatement Orders. This is complemented by CalGEM, which sets the technical standards for well plugging to ensure groundwater aquifers are permanently protected, and the State Water Board's Division of Drinking Water, which sets the drinking water standards that all cleanup actions are designed to safeguard. Together, this state framework provides a comprehensive and enforceable set of rules and direct agency oversight for every phase of the Project's decommissioning and restoration, ensuring the protection of both surface water and groundwater.

Local Regulations

Los Angeles County's local regulations provide a comprehensive framework for protecting water resources, managing stormwater, and preventing pollution within unincorporated areas. This framework is guided by the foundational policies of the County General Plan and is implemented through specific, enforceable ordinances in the County Code. These local regulations are directly applicable to the decommissioning activities required by the Project, establishing the standards for stormwater management, pollution prevention, and the protection of surface water and groundwater that all site work must adhere to.

Los Angeles County General Plan

The Conservation and Natural Resources Element of the General Plan provides the following goals and policies potentially relevant to the Project:

Goal C/NR 5: Protect any useable local surface water resources.

- Policy C/NR 5.1 Support the Low Impact Development (LID) philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.
- Policy C/NR 5.2 Require compliance by all County departments with adopted MS4, General Construction, and point source NPDES permits.

- Policy C/NR 5.3 Actively engage with stakeholders in the formulation and implementation of surface water preservation and restoration plans, including plans to improve impaired surface water bodies by retrofitting tributary watersheds with LID types of BMPs.
- Policy C/NR 5.4 Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved Total Maximum Daily Load (TMDL) implementation and monitoring plans.
- Policy C/NR 5.5 Manage the placement and use of septic systems in order to protect nearby surface water bodies.
- Policy C/NR 5.6 Minimize point and non-point source water pollution.
- Policy C/NR 5.7 Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as roadway, railway, bridge, and other—particularly—tributary street and greenway interface points with channelized waterways.

Goal C/NR 6: Protect any useable local groundwater resources. Policy C/NR 6.1 Support the LID philosophy, which incorporates distributed, post-construction parcel-level stormwater infiltration as part of new development.

- Policy C/NR 6.2 Protect natural groundwater recharge areas and regional spreading grounds.
- Policy C/NR 6.3 Actively engage in stakeholder efforts to disperse rainwater and stormwater infiltration BMPs at regional, neighborhood, infrastructure, and parcel-level scales.
- Policy C/NR 6.4 Manage the placement and use of septic systems in order to protect high groundwater. Policy C/NR 6.5 Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in contaminated soils.

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Project:

Goal S 2: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to flood and inundation hazards.

- Policy S 2.1 Discourage development in the County's Flood Hazard Zones.
- Policy S 2.2 Discourage development from locating downslope from aqueducts.
- Policy S 2.4 Ensure that developments located within the County's Flood Hazard Zones are sited and designed to avoid isolation from essential services and facilities in the event of flooding.
- Policy S 2.5 Ensure that the mitigation of flood related property damage and loss limits impacts to biological and other resources.
- Policy S 2.6 Work cooperatively with public agencies with responsibility for flood protection, and with stakeholders in planning for flood and inundation hazards.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Project:

Goal PS/F 3: Increased local water supplies through the use of new technologies.

- Policy PS/F 3.1 Increase the supply of water though the development of new sources, such as recycled water, gray water, and rainwater harvesting.

- Policy PS/F 3.2 Support the increased production, distribution, and use of recycled water, gray water, and rainwater harvesting to provide for groundwater recharge, seawater intrusion barrier injection, irrigation, industrial processes, and other beneficial uses.
- Goal PS/F 4 Reliable sewer and urban runoff conveyance treatment systems.
- Policy PS/F 4.1 Encourage the planning and continued development of efficient countywide sewer conveyance treatment systems.
- Policy PS/F 4.2 Support capital improvement plans to improve aging and deficient wastewater systems, particularly in areas where the General Plan encourages development, such as Transit Oriented Districts. Policy PS/F 4.3 Ensure the proper design of sewage treatment and disposal facilities, especially in landslide, hillside, and other hazard areas.
- Policy PS/F 4.4 Evaluate the potential for treating stormwater runoff in wastewater management systems or through other similar systems and methods.

County of Los Angeles Grading Code (Title 26)

Requirements for grading, excavation, and erosion control are established in Title 26 of the Los Angeles County Code. These regulations are designed to prevent erosion and protect water quality during land-disturbing activities, such as the decommissioning and site restoration work required by the Project.

For all decommissioning sites, stormwater pollution control measures, known as Best Management Practices (BMPs), must be incorporated. For sites with a disturbed, graded area of less than one acre, an Erosion and Sediment Control Plan (ESCP) is required prior to the County's issuance of a grading permit. The ESCP must include specific BMPs to minimize the transport of sediment and protect public and private property from the effects of erosion, flooding, or the deposition of mud, debris, or other pollutants.

For larger decommissioning sites with a disturbed, graded area of one acre or greater, the operator must obtain coverage under the statewide NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ). This requires the preparation of a State Storm Water Pollution Prevention Plan (SWPPP) and the filing of a Notice of Intent (NOI) with the State Water Resources Control Board. The State SWPPP, prepared in accordance with the Construction General Permit, can be accepted by the County as the required ESCP.

All active grading projects with work proposed during the rainy season (October 15 to April 15) must have an updated ESCP on file with the County and have all required BMPs installed prior to the start of the season. These grading code requirements provide an enforceable mechanism to ensure that all ground disturbance associated with the Project's decommissioning and restoration activities is conducted in a manner that controls erosion and protects water quality.

Los Angeles County Flood Control District Code

Chapter 21 of the County Flood Control District Code, Stormwater and Runoff Pollution Control, sets forth requirements regulating discharges to Los Angeles County Flood Control District (LACFCD) storm drains. The following discharges to County storm drains are prohibited:

- Discharges of stormwater containing pollutant concentrations that exceed or contribute to the exceedance of a water quality standard.
- Non-stormwater discharges unless authorized by an NPDES Permit and by a permit issued by the Chief Engineer.
- Discharges of sanitary or septic waste or sewage.
- Pollutants, leaves, dirt, or other landscape debris.
- Additionally, Chapter 20.94, Channels, prohibits placing obstructions, refuse, or contaminating substances in a flood control channel, including within the channel, bed, or on the bank of any river, stream, wash, or arroyo.

These provisions are directly applicable to the Project's decommissioning and site restoration activities. The prohibitions in Chapter 21 ensure that pollutants generated during site work, such as sediment or residual hydrocarbons, are not illegally discharged into the storm drain system. For any sites adjacent to a flood control channel, the Project's requirement to remove all infrastructure is consistent with the prohibitions in Chapter 20.94 against placing obstructions or contaminating substances near these water bodies.

National Flood Insurance Program

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 mandate that the Federal Emergency Management Agency (FEMA) evaluate flood hazards. FEMA provides Flood Insurance Rate Maps (FIRMs) for local and regional planners to promote sound land use and floodplain development. To delineate a FIRM, FEMA conducts engineering studies and identifies Special Flood Hazard Areas (SFHAs), which are areas subject to inundation by a 1-percent-annual-chance flood (also known as the 100-year flood). Community members can participate in the National Flood Insurance Program (NFIP) if their local government adopts and enforces floodplain management ordinances that meet minimum FEMA criteria.

The NFIP is relevant to the Proposed Project because, as identified in the Environmental Setting, portions of several oil fields are located within SFHAs as delineated on FEMA's FIRMs. The Project requires the decommissioning and removal of this existing industrial infrastructure from the floodplain. This action is consistent with the primary goal of the NFIP and the County's associated floodplain management ordinances, which is to reduce the risk of flood-related damage. By removing potential obstructions and sources of hazardous material releases from these high-risk areas, the Project has a long-term beneficial impact on flood safety.

Stormwater Pollution Prevention Plans

Pursuant to the CWA, the State Water Resources Control Board (SWRCB) has issued a statewide general NPDES Permit for stormwater discharges from construction sites, the Construction

General Permit (Order No. 2022-0057-DWQ). Under this permit, discharges of stormwater from sites with a disturbed area of one or more acres are required to obtain coverage.

Coverage is accomplished by filing a Notice of Intent (NOI) with the SWRCB and by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must be prepared prior to any ground disturbance and must list the Best Management Practices (BMPs) that will be implemented on the site to protect stormwater runoff. The SWPPP must also contain a visual monitoring program and, in certain cases, a chemical monitoring program for "non-visible" pollutants and a monitoring plan if the site discharges directly to a water body on the State's 303(d) list of impaired waters.

These SWPPP requirements are the primary regulatory mechanism for controlling water quality impacts during the Project's physical activities. All decommissioning and site restoration work associated with the Project that disturbs one or more acres of land will be required to obtain coverage under this permit and implement a site-specific SWPPP. This is an enforceable requirement under the Clean Water Act for all decommissioning work disturbing one acre or more.

Low Impact Development (LID) Standards Manual

Low Impact Development (LID) is a design strategy that uses naturalistic, on-site best management practices (BMPs) to lessen the impacts of development on stormwater quality and quantity. The goal of LID is to mimic the undeveloped runoff conditions of a site after development is complete.

In 2014, the County of Los Angeles adopted LID requirements for development occurring within the unincorporated areas. The County's Low Impact Development Standards Manual was prepared to comply with the requirements of the NPDES Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2021-0105). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects to improve water quality and mitigate potential impacts from stormwater discharges.

The County's LID requirements are not directly applicable to the decommissioning and site restoration activities of the Project, as these actions are not considered new development. However, the LID Standards Manual is relevant to the Project's long-term outcomes. Any potential future development or redevelopment on a site after it has been fully remediated would be subject to the mandatory requirements of the County's LID Ordinance.

Summary of Local Hydrology and Water Quality Considerations

Los Angeles County's local regulations provide a framework of policies and enforceable ordinances to protect local water resources. The General Plan establishes overarching policies for the protection of surface water and groundwater and for the management of flood hazards. These policies are implemented through specific requirements in the County Code, including the Grading Code (Title 26), which mandates erosion and sediment control for all land-disturbing activities, and

the Flood Control District Code, which prohibits the illegal discharge of pollutants into the storm drain system. This local framework ensures that all decommissioning and site restoration activities under the Project will be subject to County oversight to protect water quality and manage stormwater runoff.

5.10.1.2 Existing Conditions

California is divided into 10 hydrologic regions by the Department of Water Resources. A hydrologic region is the area drained by a major river system or a group of streams forming a coastal drainage area. The unincorporated areas of Los Angeles County span parts of two of these hydrologic regions: the South Coast and South Lahontan regions.

While these large hydrologic regions provide a broad context, the direct environmental setting for the Project is defined by the specific watersheds in which the inventoried oil and gas facilities are located. Based on the site inventory in Appendix A, the Project sites are distributed across several major watersheds:

- Facilities in the Santa Clarita Valley Planning Area are located within the Santa Clara River Watershed.
- Sites in the Metro, Westside, and Gateway Planning Areas are primarily located within the Los Angeles River Watershed and the Ballona Creek Watershed.
- Facilities in the East and West San Gabriel Valley Planning Areas are within the San Gabriel River Watershed.
- The few sites in the Antelope Valley Planning Area are located within the closed basins of the Antelope Valley Watershed, which is part of the South Lahontan region and does not drain to the ocean.

Watersheds

A watershed is the area of land where all the water that is under it or drains off it goes into the same place. The oil and gas facilities subject to the Project, as detailed in Appendix A, are located across the following major watersheds.

Antelope Valley Watershed

The Antelope Valley Watershed occupies 3,363 square miles in northern Los Angeles County and has no outlet to the ocean. Numerous streams drain from the surrounding San Gabriel, Tehachapi, and El Paso Mountains into the valley, where surface water either infiltrates into groundwater or enters three dry lakes. This watershed contains only a few scattered oil and gas sites subject to the Project, most of which are identified in Appendix A as idle, orphaned, or dry holes.

Los Angeles River Watershed

The Los Angeles River Watershed spans 830 square miles from the San Gabriel, Santa Susana, and Santa Monica Mountains south to the Pacific Ocean. This highly urbanized watershed contains

numerous Project sites, particularly those in the Metro and Gateway Planning Areas, including facilities associated with the Montebello, Dominguez, and Rosecrans oil fields as detailed in Appendix A.

Dominguez Channel and Los Angeles Harbor Watershed

The Dominguez Watershed spans 133 square miles of southwest Los Angeles County. The Dominguez Channel is the primary drainage, extending 15 miles from the City of Hawthorne to the Los Angeles Harbor. The Project sites located within this watershed are primarily in the South Bay Planning Area, including numerous facilities in the community of West Carson that are part of the Torrance Oil Field.

San Gabriel River Watershed

The San Gabriel River Watershed spans 905 square miles of east-central and southeast Los Angeles County, extending from the San Gabriel Mountains to the ocean. Project facilities within this watershed are concentrated in the Puente Hills, including the Brea-Olinda and Sansinena oil fields in the East San Gabriel Valley Planning Area, as identified in Appendix A.

Santa Clara River Watershed

The Santa Clara River Watershed spans 1,624 square miles in northwest Los Angeles County and Ventura County. This watershed is home to the highest concentration of oil and gas facilities subject to the Project, including the numerous large oil fields in the Santa Clarita Valley Planning Area such as the Del Valle, Castaic Hills, Honor Rancho, and Newhall-Potrero fields, as well as those within the Newhall Ranch Specific Plan.

Santa Monica Bay Watersheds

This group of watersheds spans 673 square miles, draining the Santa Monica Mountains and the urban plains to the south. The most relevant portion of this watershed group to the Project is the Ballona Creek Watershed, which contains the large Inglewood Oil Field in the Westside Planning Area. Additional scattered and mostly orphaned wells subject to the Project are also located in the Santa Monica Mountains portion of the watershed, as detailed in Appendix A.

Drainage Facilities

The hydrology of Los Angeles County is managed by a vast network of natural and engineered drainage facilities, including rivers, flood control channels, dams, and reservoirs. The key facilities within the watersheds containing Project sites are described below.

Los Angeles River Watershed

The Los Angeles River and the Rio Hondo are the primary drainage channels in this watershed. Major flood control dams include Pacoima Dam, Hansen Dam, and Sepulveda Dam. These dams serve a vital role in flood protection for the densely populated areas downstream and contribute to water conservation and groundwater recharge. Numerous oil and gas facilities subject to the Project, particularly in the Montebello and Rosecrans oil fields, are in proximity to and drain into this extensive system of flood control channels.

San Gabriel River Watershed

The San Gabriel River is the principal drainage channel in this watershed. Major flood control dams include Whittier Narrows Dam, Santa Fe Dam, and Morris Dam. These facilities provide critical flood protection for the San Gabriel Valley and play a key role in water conservation. Project sites in the Puente Hills, including the Brea-Olinda and Sansinena oil fields, are in the upper reaches of this watershed and drain toward the San Gabriel River.

Dominguez Channel Watershed

The Dominguez Channel is the main engineered flood control channel in this highly urbanized watershed. Many Project sites, including those associated with the Torrance Oil Field in West Carson, discharge stormwater runoff into this channel system.

Santa Clara River Watershed

The Santa Clara River is the main drainage channel in this watershed. The two largest reservoirs in the Los Angeles County portion of the watershed, Castaic Lake and Pyramid Lake, are primarily water storage reservoirs for the State Water Project rather than flood control dams. The numerous oil fields subject to the Project in the Santa Clarita Valley, such as the Castaic Hills and Del Valle fields, are located on lands that drain directly into the Santa Clara River and its tributaries.

Santa Monica Bay Watersheds

This area is drained by a series of smaller streams and channels that flow to the Santa Monica Bay. The most prominent of these is Ballona Creek, a channelized waterway that drains much of the western Los Angeles basin. The Inglewood Oil Field, a major facility subject to the Project, is located entirely within the Ballona Creek watershed.

Antelope Valley Watershed

This watershed is a closed basin system without a single primary drainage channel. Stormwater runoff from the surrounding mountains drains toward several dry lake beds on the valley floor or infiltrates into the ground. The few scattered Project sites in this region are located on desert lands that drain via sheet flow and small, ephemeral washes.

Surface Water Quality

Impaired Water Bodies (303(d) List)

Section 303(d) of the Clean Water Act requires states to identify water bodies that do not meet established water quality standards. These "impaired water bodies" are placed on the 303(d) List. The Clean Water Act then requires the development of a Total Maximum Daily Load (TMDL) for each listed pollutant, which acts as a "pollution budget" to restore the water body to health.

This is highly relevant to the Project because, as noted in the Environmental Setting, nearly all major water bodies receiving runoff from the Project sites are already listed as impaired, often for pollutants associated with industrial activities and urban runoff, such as petroleum hydrocarbons, heavy metals, and sediment. According to the 2024 California Integrated Report, there are 877 listings of waterbody-pollutant combinations in the Los Angeles Region.

Therefore, the decommissioning activities must be managed with a heightened level of care to avoid contributing to these existing impairments. The required Stormwater Pollution Prevention Plans (SWPPPs) for these sites will need to include specific and robust Best Management Practices (BMPs) to control these pollutants of concern and may be subject to more stringent monitoring requirements by the LARWQCB. In the long term, the Project's requirement to remediate contaminated sites and eliminate industrial runoff will contribute positively to achieving the water quality goals of the TMDL program by removing a source of these impairing pollutants.

Groundwater Basins

The Project sites are located above several of Southern California's most critical groundwater basins, which are a primary source of local drinking water. The protection of these basins from contamination is a key consideration of this analysis.

South Coast Region

Coastal Plain of Los Angeles Groundwater Basin: This basin underlies nearly all of the Los Angeles Basin south of the Puente and Repetto Hills and is divided into the Central and West Coast sub-basins. This basin underlies some of the most prolific and historically significant oil fields subject to the Project, including the Inglewood, Rosecrans, Dominguez, and Torrance oil fields. The numerous wells and facilities in the Westside, Metro, Gateway, and South Bay Planning Areas represent a potential risk to the water quality of this vital urban groundwater source.

San Fernando Valley Groundwater Basin: This basin underlies the entirety of the San Fernando Valley. The oil fields subject to the Project in the San Fernando Valley Planning Area, such as the Aliso Canyon and Oat Mountain fields, are located in the surrounding hills and mountains at the margins of this groundwater basin.

Raymond Groundwater Basin: This basin extends beneath the northwestern San Gabriel Valley. No significant oil and gas facilities subject to the Project are located above this groundwater basin.

Main San Gabriel Valley Groundwater Basin: This basin underlies most of the San Gabriel and Puente Valleys. The Project sites in the East San Gabriel Valley Planning Area, particularly those in the Puente Hills associated with the Brea-Olinda and Sansinena oil fields, are located within the watershed that recharges this important basin.

Santa Clara River Valley Groundwater Basin: This basin underlies the Santa Clarita Valley. It is directly overlain by the high concentration of oil fields subject to the Project, including the Del Valle, Castaic Hills, and Newhall-Potrero fields. The protection of this basin is a critical issue for the region's water supply.

Upper Santa Ana Valley Groundwater Basin: This basin primarily underlies San Bernardino County but extends into the eastern edge of Los Angeles County. A small number of Project sites at the far eastern edge of the Brea-Olinda Oil Field are located at the westernmost margin of this basin.

South Lahontan Region

Antelope Valley Groundwater Basin: This vast basin underlies the Antelope Valley. It is overlain by only a few scattered, mostly idle or orphaned wells that are subject to the Project.

El Mirage Valley and Middle Mojave River Valley Groundwater Basins: These two basins underlie small areas along the northeast edge of Los Angeles County. No oil and gas facilities subject to the Project are located above these groundwater basins.

Groundwater Quality

The quality of local groundwater basins is generally good but has been impacted in some areas by historical industrial and agricultural activities. The primary risk associated with existing oil and gas operations is the potential for groundwater contamination from surface spills or from the subsurface migration of fluids due to improperly constructed or failed wells.

Coastal Plain of Los Angeles Groundwater Basin

While water delivered to customers meets all drinking water standards, the raw groundwater in the Central and West Coast sub-basins is impacted by a variety of constituents that require active management. Legacy industrial solvents like TCE and PCE are present, particularly in the central and eastern portions of the Central Basin. More recently, per- and polyfluoroalkyl substances (PFAS) have emerged as a critical contaminant of concern. Detections of PFOA and PFOS at levels exceeding new federal standards have been concentrated in the Montebello Forebay, a key replenishment zone, prompting the Water Replenishment District to launch a multi-million-dollar PFAS Remediation Program to fund new treatment systems. The numerous oil and gas facilities subject to the Project in this basin, including the large Inglewood and Torrance oil fields, represent a potential source of hydrocarbon and saline contamination that could further impact this vital drinking water source if not properly decommissioned.

San Fernando Valley Groundwater Basin

Groundwater quality in this basin remains severely degraded due to industrial activity dating back to the 1940s. Nearly half of the Los Angeles Department of Water and Power's (LADWP) production wells are inactive due to contamination. The primary contaminants of concern are volatile organic compounds (VOCs) such as TCE and PCE, but the problem is compounded by the widespread presence of 1,4-dioxane, hexavalent chromium, and perchlorate. This has necessitated a massive, multi-faceted cleanup program, with an estimated capital cost of $600 million, to restore the basin's use as a primary local water source. While the Project facilities in this planning area are located at the margins of the basin, the proper plugging and abandonment of wells in the Aliso Canyon and Oat Mountain oil fields is critical to prevent any potential migration of contaminants into the underlying aquifers.

Main San Gabriel Valley Groundwater Basin

This basin is a primary source of drinking water for the region, but its raw water is contaminated in many areas with a complex mixture of chemicals requiring extensive treatment. Contaminants include VOCs, nitrates, perchlorate, N-nitrosodimethylamine (NDMA), 1,2,3-trichloropropane (1,2,3-TCP), and 1,4-dioxane. More recently, PFAS have emerged as a significant new challenge, prompting the San Gabriel Basin Water Quality Authority to file a lawsuit against chemical manufacturers to recover cleanup costs. The oil and gas facilities in the Puente Hills that are subject to the Project are in the recharge areas for this basin. The Project's requirement to remediate any site contamination is therefore essential to prevent adding to the existing burden of industrial pollutants in this groundwater supply.

Raymond Groundwater Basin

Portions of this basin, particularly in the Monk Hill Subarea, are impacted by perchlorate and VOCs, which are actively managed by Pasadena Water and Power through wellhead treatment to ensure all delivered water meets regulatory standards. No significant oil and gas facilities subject to the Project are located above this groundwater basin.

Santa Clara River Valley East Groundwater Basin

This basin is a critical water source for the Santa Clarita Valley. While the treated water delivered to customers meets all drinking water standards, the raw groundwater quality has been severely compromised by the discovery of widespread PFAS contamination. In response to detections of PFOA and PFOS, the Santa Clarita Valley Water Agency was forced to remove 28 of its 45 active groundwater wells from service, representing a loss of approximately 45% of the agency's total groundwater supply capacity. This has necessitated a major capital program to construct new PFAS treatment facilities to restore this production capacity. The basin is directly overlain by a high concentration of oil fields, making the proper decommissioning of the numerous wells and facilities

required by the Project a key measure to protect this vital but vulnerable basin from future potential contamination.

Antelope Valley Groundwater Basin

Groundwater quality in this basin is excellent within the principal aquifer but is monitored for naturally occurring contaminants. Arsenic is a known contaminant that is managed primarily by blending water from different wells to ensure compliance with the drinking water standard. For hexavalent chromium, another contaminant of concern, the State Water Resources Control Board re-adopted a formal Maximum Contaminant Level (MCL) of 10 parts per billion in April 2024, which now requires water purveyors with impacted wells to develop and implement active compliance plans. While the few scattered oil and gas sites subject to the Project in this region are not known sources of these specific contaminants, their proper decommissioning is necessary to prevent the introduction of other potential pollutants, such as hydrocarbons or saline fluids, into the aquifer system.

Flood Hazards

According to mapping by the Federal Emergency Management Agency (FEMA), portions of several oil fields are located within 100-year floodplains, also known as Special Flood Hazard Areas (SFHAs). Facilities within these zones are at risk of being inundated during a major storm event, which could lead to damage and the uncontrolled release of hazardous materials into floodwaters. The locations of these flood zones are described below by Planning Area.

- Antelope Valley Planning Area: About 120 square miles of 100-year flood zones are located mainly along Big Rock Wash, Rock Creek, and Little Rock Wash.
- Santa Clarita Valley Planning Area: One-hundred-year flood zones are mapped along the Santa Clara River and several of its tributaries. Numerous oil and gas facilities subject to the Project are located within or adjacent to these floodplains.
- Santa Monica Mountains Planning Area: Approximately 487 acres of 100-year flood zones are located in and around several streams, including Malibu Creek and Topanga Creek. A few scattered and mostly orphaned wells subject to the Project are in the vicinity of these flood zones.
- San Fernando Valley Planning Area: One-hundred-year flood zones are located in Encino Reservoir and along several creeks and canyons. The oil fields subject to the Project are generally located in the hills above these areas.
- West San Gabriel Valley Planning Area: A 100-year flood zone is mapped in the Whittier Narrows Flood Control Basin. Several oil wells subject to the Project are located within the Whittier Narrows Recreation Area, in proximity to this flood zone.
- East San Gabriel Valley Planning Area: A small area in Tonner Canyon in the Puente Hills and a segment of the San Gabriel River are mapped as 100-year flood zones. Portions of the Brea-Olinda Oil Field are located within the Puente Hills near these hazard areas.
- Westside Planning Area: A small area of a 100-year flood zone is mapped in the Baldwin Hills. The adjacent Inglewood Oil Field, which is subject to the Project, lies in close proximity to this zone.
- Metro Planning Area: No 100-year flood zones are mapped in the unincorporated areas of the Metro Planning Area.

- South Bay Planning Area: Two small areas in West Carson, where facilities associated with the Torrance Oil Field are located, are mapped as 100-year flood zones.
- Gateway Planning Area: A segment of the Los Angeles River is mapped as a 100-year flood zone. Portions of the Dominguez and Montebello oil fields are located near this flood zone.
- Coastal Islands Planning Area: No 100-year flood zones are mapped in the unincorporated areas of this planning area.

Seismically Induced Dam Inundation

Dam inundation areas are mapped by dam owners and submitted to the California Office of Emergency Services (CalOES). Dams in Los Angeles County with inundation areas affecting unincorporated areas are listed in Table 5.10-1. Most of these are flood control dams that do not impound substantial reservoirs for most of the year. After flood flows, water is released at a controlled rate to create flood control capacity for the next storm, with some of the released water used for groundwater recharge. Castaic Lake and Pyramid Lake are the major water storage reservoirs in the region and are part of the State Water Project. All dams in Los Angeles County must meet safety requirements and are inspected annually by the Division of Safety of Dams of the California Department of Water Resources.

The potential for seismically induced dam inundation is a known regional hazard; however, the Proposed Project does not create or exacerbate this risk. The Project's activities, which involve the decommissioning of oil and gas wells, do not include any actions that could affect the structural integrity of a dam. The Project does not place any new structures for human occupancy within any mapped dam inundation area. To the contrary, by requiring the permanent removal of oil and gas infrastructure, the Project has a long-term beneficial impact by reducing the amount of potentially hazardous materials located within these potential inundation zones.

Table 5.10-1 Dams with Inundation Areas Including Unincorporated Areas

Planning Area[1]	Watershed	Dam or Reservoir	Nearest City or Community[2]
Antelope Valley	Antelope – Fremont Valleys	Fairmont Reservoir	Lake Hughes [Los Angeles County]
		Lake Palmdale (Harold Reservoir)	Palmdale
		Littlerock Reservoir	Palmdale
	Santa Clara	Pyramid Lake*	Castaic [Los Angeles County]
	San Gabriel River	Big Dalton Dam	Glendora
		Cogswell Dam	San Gabriel Mountains: West Fork, San Gabriel River
		San Gabriel Dam*	San Gabriel Mountains: San Gabriel River, north of Azusa
		Morris Dam*	San Gabriel Mountains: San Gabriel River, north of Azusa
Santa Clarita Valley	Santa Clara	Bouquet Canyon	Palmdale
		Castaic Lake	Castaic [Los Angeles County]
		Pyramid Lake	Castaic [Los Angeles County]
Santa Monica Mountains	Santa Monica Bay	Century Reservoir	Agoura Hills
San Fernando Valley	Los Angeles River	Big Tujunga Reservoir	Lake View Terrace [Los Angeles]
		Hansen Dam	Pacoima [Los Angeles]
		Pacoima Reservoir	Sylmar [Los Angeles]
		Sepulveda Dam*	Encino [Los Angeles] and Lake Balboa [Los Angeles]
West San Gabriel Valley	Los Angeles River	Morris S. Jones Reservoir	Pasadena
	San Gabriel River	San Gabriel Dam	San Gabriel Mountains: San Gabriel River, north of Azusa
		Morris Dam	San Gabriel Mountains: San Gabriel River, north of Azusa
		Santa Fe Dam	Irwindale
East San Gabriel Valley	San Gabriel River	Puddingstone Reservoir	San Dimas
		San Dimas Reservoir	San Dimas
		San Gabriel Dam	San Gabriel Mountains: San Gabriel River, north of Azusa
		Thompson Creek Reservoir	Claremont
Westside	Santa Monica Bay	Stone Canyon Reservoir	Bel Air [Los Angeles]
Metro	Los Angeles River	Sepulveda Dam	Encino [Los Angeles] and Lake Balboa [Los Angeles]
Gateway	Los Angeles River and San Gabriel River	Whittier Narrows Dam	Pico Rivera
Coastal Islands	San Pedro Channel Islands	Wrigley Reservoir (Santa Catalina Island)	Avalon

Source: Cal/EMA 2007.
* Dam inundation area spans two or more planning areas.
[1] There are no dam inundation areas mapped by the California Emergency Management Agency within unincorporated parts of the South Bay Planning Area.
[2] Abbreviations of areas: Communities in the City of Los Angeles are abbreviated as San Pedro [Los Angeles], and communities in unincorporated areas are abbreviated as West Athens [Los Angeles County].

Seiches

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Reservoirs and above-ground water storage tanks can generate seiches, posing substantial flood

hazards. Standards for steel and reinforced concrete tank design are issued by the American Water Works Association and the California Department of Public Health to mitigate these risks.

A seiche is a potential geologic hazard related to surface water bodies; however, the Proposed Project does not create or exacerbate this risk. The Project's activities do not involve the construction or operation of reservoirs or large water tanks. While some Project sites may be in areas that could be affected by a seiche, the Project's action is to remove industrial infrastructure, including oil and gas storage tanks. This action results in a long-term beneficial impact by reducing the amount of hazardous materials located in areas that could be subject to this type of inundation.

Tsunamis

A tsunami is a sea wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The West Coast and Alaska Tsunami Warning Center issues tsunami warnings for the Pacific Coast. Tsunami inundation areas in the unincorporated County are mapped by the California Geological Survey and are primarily located in the coastal portions of the Santa Monica Mountains Planning Area (e.g., Topanga and Leo Carrillo State Beaches) and the Westside Planning Area (Marina del Rey).

While the risk of a tsunami is a significant coastal hazard, the Project does not create or exacerbate this risk. A review of the mapped tsunami inundation areas and the site inventory in Appendix A indicates that a small number of oil and gas facilities subject to the Project are located within these zones, specifically in the Santa Monica Mountains coastal area and Marina del Rey. These facilities are also located in the Coastal Zone. Since the Project does not apply to the Coastal Zone, these sites are beyond the scope of this Project.

Mudflows

A mudflow is a combination of water, rock, debris, and soil resulting from surface erosion. The Los Angeles County Flood Control District’s (LACFCD) reservoirs and debris basins are designed to capture large volumes of sediment from mudflows in tributary watersheds. Areas of Los Angeles County that are most susceptible to mudflows include canyons and areas along the bases of mountain slopes, particularly in areas burned by recent wildfires. Slopes that could generate mudflows are present in or immediately upslope from all Planning Areas containing Project sites.

The risk of mudflows is a known hazard in many of the hillside areas where oil and gas facilities subject to the Project are located, such as the Puente Hills and the mountains surrounding the Santa Clarita Valley. The Project requires the decommissioning and removal of all industrial infrastructure from these areas. This action will have a long-term beneficial impact by eliminating the potential for oil and gas equipment to be damaged during a mudflow event, which in turn prevents the release of hazardous materials into the environment. While short-term decommissioning activities will involve ground disturbance, these activities must comply with the County's strict Grading Code and will be guided by site-specific Erosion and Sediment Control Plans, as required by PDF-GEO-2, to ensure long-term slope stability.

5.10.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.

HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

HYD-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of Federal 100-year hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

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

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

HYD-4 Otherwise place structures In Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements.

HYD-5 Conflict with the Los Angeles County Los Impact Development Ordinance (LA County Code, Title 12, Chapter 12.84).

HYD-6 Use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course).

HYD-7 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

HYD-8 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

5.10.3 Environmental Impact

5.10.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the long-term phase-out of fossil fuels would be generally beneficial to water quality but acknowledged that the physical decommissioning of infrastructure would involve earth-moving and grading that could generate temporary, short-term water quality impacts. The CAP PEIR determined that these impacts are fully mitigated to a less-than-significant level through mandatory regulatory compliance with the NPDES Construction General Permit, Stormwater Pollution Prevention Plans (SWPPP), and local grading ordinances (CAP PEIR, Chapter 3.10). Therefore, this programmatic analysis strictly evaluates the incremental short-term impacts of ROWO's decommissioning activities. Because these temporary activities are strictly governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with existing local, state, and federal water quality regulations (including NPDES permits and SWPPP requirements), this analysis focuses on demonstrating how these existing frameworks ensure any short-term hydrologic impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The evaluation of impacts to hydrology and water quality is based on a regulatory and risk-based assessment. This analysis uses established environmental principles to evaluate potential changes to water resources resulting from the implementation of the Revised Oil Well Ordinance. The methodology focuses on the Project's compliance with the extensive regulatory framework governing water resources and its net effect on the protection of surface water and groundwater.

This assessment is based on a qualitative review of existing conditions and the reasonably foreseeable physical activities associated with decommissioning and site remediation. It considers:

- The existing surface water and groundwater conditions, including designated beneficial uses and known impairments on the 303(d) list.
- The location of Project sites relative to sensitive water bodies, critical groundwater basins, recharge areas, and FEMA-mapped flood hazard zones.
- The potential for short-term water quality impacts from decommissioning activities, such as erosion, sedimentation, and polluted stormwater runoff.
- The potential for long-term beneficial impacts from eliminating potential sources of contamination and restoring more natural site hydrology.
- The comprehensive federal, state, and local regulatory framework that governs water quality protection.

Key sources of information include:

- Federal and state regulations, particularly the Clean Water Act and the Porter-Cologne Water Quality Control Act.
- NPDES permits, including the statewide Construction General Permit.
- The County of Los Angeles General Plan (Conservation and Safety Elements).
- The County Code (Grading Code, Flood Control District Code, and LID Ordinance).
- Prior CEQA documents for existing oil fields.
- GIS data showing Project sites, watersheds, floodplains, and impaired water bodies.
- FEMA Flood Insurance Rate Maps (FIRMs).

This methodology is consistent with CEQA Guidelines Appendix G and focuses on comparing the Project's managed, temporary decommissioning risks against the permanent elimination of long-term operational hazards to determine whether the Project would result in a substantial adverse change to water resources.

5.10.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code, the Baldwin Hills Community Standards District (CSD), the Newhall Ranch Specific Plan, and the County General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once the amortization period ends, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Key hydrology and water quality-related Project characteristics include:

- Elimination of New Contamination Risks: No new oil and gas facilities will be permitted. This prevents the introduction of new potential sources of surface and groundwater contamination from spills, leaks, or routine industrial discharges.
- Mandatory Decommissioning and Remediation (PDF-LU-1 and PDF-LU-2): Upon cessation of operations, all facilities must be decommissioned pursuant to the Project's built-in mandates. This includes the permanent plugging of wells to CalGEM standards to protect and isolate groundwater aquifers, the complete removal of all infrastructure (some of which is located in floodplains), and the remediation of any contaminated soil and groundwater in accordance with DTSC and Regional Water Quality Control Board standards.
- Application in Sensitive Hydrologic Areas: The Project applies to sites located over critical groundwater basins, within major watersheds that drain to impaired water bodies, and, in some cases, within FEMA-mapped floodplains.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in long-term beneficial impacts to hydrology and water quality by eliminating permanent, industrial sources of potential contamination. While temporary, short-term impacts from erosion and polluted runoff may occur during the decommissioning process, these risks are managed and minimized through the Project’s built-in performance standards and the existing regulatory framework.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for hydrology and water quality.

5.10.3.3 Impact Analysis

This section evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to hydrology and water quality within the unincorporated areas of Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance, well abandonment, and site remediation, which apply throughout the decommissioning process.

From a hydrology and water quality standpoint, the Project is expected to result in two primary types of effects:

- Short-Term, Managed Risks: Temporary, construction-related risks to water quality may occur during the decommissioning and remediation of existing facilities. These could include the potential for erosion, sedimentation, and polluted stormwater runoff during ground-disturbing activities. These risks are managed through a comprehensive regulatory framework and the Project's built-in performance standards.
- Long-Term Beneficial Effects: The Project will result in the permanent elimination of potential sources of surface and groundwater contamination. These actions would remove the long-term risks of oil spills, chemical leaks from active operations, and potential contamination from improperly abandoned wells, thereby improving the protection of regional water resources.

This section evaluates the Project’s impacts relative to each of the applicable CEQA significance thresholds. The analysis considers both the temporary, managed risks and the permanent, beneficial effects of implementation, using a qualitative, risk-based approach. The analysis considers the Project's compliance with the extensive regulatory framework for water quality and the effectiveness of its embedded water quality protections.

Impact 5.10-1: Would the proposed Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? [Threshold HYD-1]

Less than Significant Impact.

The Project would not violate any water quality standards or waste discharge requirements. The Project's primary long-term effect is a significant beneficial impact on surface and groundwater quality by permanently removing existing sources of industrial contamination. The potential for temporary, short-term water quality degradation during decommissioning activities is reduced to a less than significant level through mandatory compliance with a comprehensive regulatory framework and the Project's own enforceable performance standards.

Long-Term Beneficial Effects

The existing oil and gas facilities subject to the Project represent permanent, potential sources of water quality degradation. The baseline condition includes the ongoing risk of surface spills or leaks of crude oil, produced water, and chemicals that can contaminate stormwater runoff and enter nearby water bodies. It also includes the risk of subsurface leaks from aging well casings or infrastructure that can contaminate vital groundwater basins. Many of the receiving water bodies in the Project Area are already listed as impaired for pollutants such as petroleum hydrocarbons.

The Project's primary long-term effect is to permanently eliminate these sources of contamination. By requiring the cessation of all oil and gas operations, the Project removes the risk of future operational spills and leaks. Furthermore, the mandatory remediation of any existing contaminated soil and groundwater, which must meet the strict cleanup standards of the RWQCB and DTSC as required by existing state law, is a significant, permanent benefit to both surface and groundwater quality. This will help the region achieve the water quality goals established in the Basin Plan and for Total Maximum Daily Loads (TMDLs).

Short-Term, Managed Risks During Decommissioning

The ground-disturbing activities required for decommissioning and site restoration, such as grading and excavation, have the potential to cause short-term water quality impacts. The reasonable worst-case scenario involves loosened sediment and residual pollutants being transported off-site by stormwater runoff.

However, these temporary risks are managed by a comprehensive and mandatory regulatory framework. Decommissioning activities disturbing one or more acres of land are required to obtain coverage under the statewide NPDES Construction General Permit (Order 2022-0057-DWQ). Coverage under this permit requires the operator to develop and implement a site-specific Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify all potential pollutant sources and specify the Best Management Practices (BMPs)—such as erosion controls, sediment controls, and waste management protocols—that will be implemented to prevent pollutants from degrading surface waters.

Consistent with the programmatic findings of the CAP PEIR, because the Project replaces a permanent risk of significant surface and groundwater contamination with a temporary, highly managed risk that is strictly controlled by NPDES and SWPPP regulations during final site cleanup, the Project would not violate any water quality standards. Therefore, the impact is less than significant.

Impact 5.10-2: Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? [Threshold HYD-2]

Less than Significant Impact.

The Project would not substantially decrease groundwater supplies or interfere with groundwater recharge. The Project's water use is temporary and minimal. Its long-term effect is a significant beneficial impact on the sustainable management of groundwater basins by permanently protecting them from contamination.

Groundwater Supplies

The Project does not involve any new land uses that would create a long-term operational demand for water. The only water use associated with the Project is the minor, temporary amount required during decommissioning activities, primarily for dust control during grading and site restoration. This temporary demand is negligible when compared to existing regional water use and would be served by local water purveyors without depleting groundwater supplies.

The Project's most significant effect on groundwater supplies is the permanent protection of their quality. The proper plugging and abandonment of all oil and gas wells, overseen by CalGEM, will eliminate potential pathways for contaminants to migrate between geologic zones and into fresh-water aquifers. Furthermore, the mandatory remediation of any existing soil and groundwater contamination under the oversight of the RWQCB ensures that legacy pollution is addressed. By permanently removing these long-term threats, the Project helps to protect the quality and long-term viability of the region's groundwater basins, which is a foundational component of sustainable groundwater management.

Groundwater Recharge

The Los Angeles County Flood Control District owns and operates over 25 spreading facilities, in addition to major flood control reservoirs like Whittier Narrows, which are used to intentionally recharge the region's groundwater basins. The Project's decommissioning activities will not occur within these dedicated recharge facilities and will not interfere with their operation in any way.

Moreover, many of the existing oil and gas sites are covered with compacted soil, gravel, or impervious surfaces like concrete pads. The Project's requirement to remove this infrastructure and restore the sites with permeable surfaces and native vegetation will have a minor, but beneficial, long-term impact by allowing more stormwater to infiltrate into the ground. This action is consistent with the County's goals to increase incidental groundwater recharge.

Because the Project's water use is minimal and it has a long-term beneficial impact on groundwater quality and a neutral to beneficial impact on groundwater recharge, the impact is less than significant.

Impact 5.10-3: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of Federal 100-year hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site.

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

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

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

[Threshold HYD-3]

Less than Significant Impact.

The Project would not substantially alter existing drainage patterns in a manner that would cause significant adverse environmental effects. The Project's long-term effect is a beneficial impact on site hydrology by removing impervious surfaces and restoring natural drainage conditions. Temporary, short-term impacts during decommissioning are managed to a less than significant level through mandatory compliance with existing regulations and the Project's own performance standards.

Long-Term Beneficial Effects on Drainage and Runoff

The existing oil and gas facilities subject to the Project often include impervious or semi-pervious surfaces, such as compacted gravel pads, concrete equipment foundations, and asphalt access roads. These surfaces alter natural drainage patterns, increase the rate and volume of stormwater runoff, and can contribute to downstream erosion and flooding.

The Project's primary long-term effect is to reverse these conditions. The mandatory decommissioning and site restoration will involve the removal of these impervious surfaces and the re-contouring and revegetation of the sites. This action will have a significant long-term beneficial impact by restoring more natural hydrologic conditions.

Analysis of Threshold Components

i. Result in substantial erosion or siltation on- or off-site:
The ground-disturbing activities during decommissioning will temporarily expose soils and could, if unmanaged, lead to short-term erosion and siltation. However, this potential impact is managed

to a less than significant level through mandatory compliance with the County Grading Code, the NPDES Construction General Permit, and the required Stormwater Pollution Prevention Plan (SWPPP). These regulations require the implementation of specific and effective Best Management Practices (BMPs) to control erosion during all phases of work.

ii & iii. Substantially increase runoff, exceed stormwater capacity, or provide additional sources of polluted runoff:
The Project will have a long-term beneficial impact on these conditions. By removing impervious surfaces and restoring vegetation, the Project will decrease, not increase, the rate and volume of surface runoff compared to the baseline condition. This helps to reduce strain on existing stormwater drainage systems. The required SWPPP will also ensure that any temporary runoff during decommissioning is managed and treated on-site to prevent the discharge of pollutants.

iv. Impede or redirect flood flows in a 100-year flood hazard area:
The Project will have a long-term beneficial impact on this condition. As identified in the Environmental Setting and Appendix A, several Project sites are located within FEMA-mapped 100-year floodplains. The Project requires the removal of all industrial infrastructure—including wells, tanks, and buildings—from these areas. This action improves the floodplain's natural function and capacity by removing potential obstructions. Temporary activities during decommissioning, such as equipment staging, would be subject to SWPPP and local permit requirements that prohibit the placement of materials in a way that would impede flood flows.

Consistent with the programmatic findings of the CAP PEIR, because the Project has a long-term beneficial impact on drainage and runoff, and because its temporary, short-term effects are managed to a less than significant level through existing regulations and Project design, the overall impact is less than significant.

Impact 5.10-4: Would the Project otherwise place structures In Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements? [Threshold HYD-4]

Less Than Significant Impact.

This threshold evaluates the risks associated with placing permanent, insurable structures within a 100-year flood hazard area. The Project does not involve the construction or placement of any such structures.

The Project does, however, involve temporary activities within designated floodplains during the decommissioning of certain facilities. This includes the presence of workers, equipment, and temporary ground disturbance. This temporary interaction is part of an action that results in the permanent removal of existing industrial infrastructure from these same hazard areas.

Because the Project does not place any new permanent structures in a floodplain and its temporary activities are part of a process that ultimately removes existing infrastructure from these hazard

areas, the Project does not create the type of risk addressed by this threshold. The temporary presence of equipment and personnel does not constitute a significant impact. Therefore, the impact is less than significant.

Impact 5.10-5: Would the Project conflict with the Los Angeles County Low Impact Development (LID) Ordinance (LA County Code, Title 12, Chapter 12.84)? [Threshold HYD-5]

No Impact.

The Los Angeles County Low Impact Development (LID) Ordinance and its associated Standards Manual require new development and redevelopment projects to incorporate on-site Best Management Practices (BMPs) to manage stormwater runoff.

The Proposed Project is a regulatory action to phase out oil and gas operations. Its physical activities are limited to decommissioning and site restoration, which are not considered new development or redevelopment projects subject to the requirements of the LID Ordinance. Therefore, the Project itself does not conflict with the ordinance, and no impact would occur.

Furthermore, any potential future development that may occur on these restored sites would be a separate project and would be required at that time to demonstrate full compliance with all applicable LID requirements.

Impact 5.10-6: Would the Project use onsite wastewater treatment systems in areas with known geological limitations (e.g. high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)? [Threshold HYD-6]

No Impact.

This threshold evaluates whether a project would install an Onsite Wastewater Treatment System (OWTS), such as a septic tank, in an area where geologic or hydrologic conditions are unsuitable.

The Proposed Project is a regulatory action to phase out industrial oil and gas operations. Its physical activities are limited to decommissioning and site restoration. The Project does not involve the construction of any new uses, such as residences, that would generate domestic wastewater. Because the Project does not create any wastewater, it does not propose or require the use of any septic tanks or other OWTS.

Therefore, the Project will have no impact related to the use of onsite wastewater treatment systems.

Impact 5.10-7: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation? [Threshold HYD-7]

Less than Significant Impact.

The Project would not result in a significant risk of pollutant release due to inundation. The Project's primary effect is the permanent removal of potential pollutant sources from flood hazard, tsunami, seiche, and mudflow zones, resulting in a long-term beneficial impact.

Flood Hazard, Tsunami, and Seiche Zones

As established in the Existing Conditions, some oil and gas facilities subject to the Project are located within FEMA-mapped 100-year floodplains, mapped tsunami inundation zones, and dam failure inundation zones (which are susceptible to seiches). The baseline condition includes the ongoing risk that these industrial facilities could be inundated during a flood, tsunami, or seiche event, potentially causing equipment damage and an uncontrolled release of crude oil, chemicals, and other hazardous substances into surface waters.

The Project's core action is the decommissioning and permanent removal of all oil and gas wells, storage tanks, and associated infrastructure from these sites. This action will have a long-term beneficial impact by eliminating the source of potential pollutants from these designated hazard zones.

Mudflow Zones

Many Project sites are also located in hillside areas susceptible to mudflows, particularly in the Puente Hills and the mountains surrounding the Santa Clarita Valley. The baseline condition includes the risk that a mudflow could damage or bury equipment, causing a release of hazardous materials into the debris flow.

The Project requires the removal of all industrial infrastructure from these high-risk areas. This action will have a long-term beneficial impact by eliminating the risk of pollutant release due to mudflows. The subsequent site restoration and revegetation will also help to improve long-term slope stability.

Because the Project's primary effect is the permanent removal of potential pollutant sources from flood, tsunami, seiche, and mudflow hazard zones, it eliminates the risk of pollutant releases due to project inundation. Therefore, the impact is less than significant.

Impact 5.10-8: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? [Threshold HYD-8]

Less than Significant Impact.

The Project would not conflict with or obstruct the implementation of a water quality control plan or a sustainable groundwater management plan. To the contrary, the Project's actions are consistent with and directly support the long-term goals of these plans by removing potential sources of pollution and protecting the quality of the region's water resources.

Consistency with Water Quality Control Plan

The primary applicable water quality control plan for most of the Project sites is the Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, which is implemented by the LARWQCB. The Basin Plan's core purpose is to protect the beneficial uses of water by setting Water Quality Objectives and establishing programs, such as Total Maximum Daily Loads (TMDLs), to clean up impaired water bodies.

The Project is highly consistent with and supports the Basin Plan in two primary ways:

- Long-Term Source Removal: The Project permanently removes industrial facilities that are ongoing potential sources of the very pollutants (e.g., petroleum hydrocarbons, chemicals, and sediment) that the Basin Plan and its TMDLs are designed to control.
- Short-Term Compliance: The temporary decommissioning activities are required to comply with the NPDES Construction General Permit and implement a SWPPP (PDF-WQ-1), which are themselves key implementation tools of the Basin Plan.

Consistency with Sustainable Groundwater Management

While the Sustainable Groundwater Management Act (SGMA) is the state's primary framework, many of the critical basins underlying the Project sites, such as the Central and West Coast Basins, are adjudicated. This means they are managed under court-ordered judgments that function as sustainable groundwater management plans.

The Project is consistent with the goals of managing these basins sustainably. The Project does not involve new long-term uses of groundwater that would conflict with adjudicated pumping rights. More importantly, the Project provides a critical benefit to groundwater quality. By requiring the proper plugging of all oil and gas wells to CalGEM standards, the Project permanently eliminates potential vertical conduits for contamination, protecting the integrity and quality of these vital drinking water aquifers.

Because the Project supports the goals of the regional Basin Plan and the sustainable management of groundwater basins, the impact is less than significant.

5.10.4 Cumulative Impacts

Cumulative impacts to hydrology and water quality consider the potential for the Project, in combination with other past, present, and reasonably foreseeable future projects, to collectively degrade water resources. The cumulative context is continued development across Los Angeles

County, which could increase the generation of water pollutants, add impervious surfaces that increase runoff and decrease recharge, and place more structures in floodplains.

However, all cumulative development projects, both in unincorporated areas and in cities, are subject to a comprehensive regulatory framework designed to protect water resources. Construction activities are regulated by the NPDES Construction General Permit, which requires the implementation of a SWPPP to control erosion and pollution. Post-construction runoff from new development and redevelopment is managed by local MS4 Permits and Low Impact Development (LID) Ordinances to control runoff rates and pollutants. Development within FEMA-mapped 100-year floodplains is required to comply with strict flood-proofing and construction standards. Because all new development must comply with these extensive requirements, the cumulative impact from regional growth on hydrology and water quality is considered less than significant.

The Project's incremental contribution to this cumulative condition is not considerable; in fact, its contribution is beneficial. The Project does not add to the cumulative problem of new development. It does not create new impervious surfaces, increase long-term polluted runoff, or place new structures in floodplains. Instead, the Project provides a net benefit to the cumulative condition by:

- Removing potential sources of industrial pollution, which helps to improve water quality in the region's impaired water bodies.
- Removing impervious surfaces and restoring sites, which helps to reduce cumulative runoff and improve local groundwater recharge.
- Removing infrastructure from floodplains, which helps to reduce cumulative flood risk.

The Project's incremental effect is to reduce, rather than increase, the cumulative stress on the region's water resources. Consistent with the overarching programmatic goals of the County's 2045 CAP, the systematic removal of fossil fuel infrastructure over a 20-year period results in a cumulatively beneficial impact to regional water quality and floodplain management. Therefore, the Project's contribution is not cumulatively considerable, and the cumulative impact is less than significant.

5.10.5 Level of Significance Before Mitigation

Based on the analysis presented in the preceding sections, all potential impacts related to hydrology and water quality resulting from the implementation of the Revised Oil Well Ordinance—both project-level and cumulative—are determined to be less than significant or no impact. The Project will not introduce new sources of water contamination; to the contrary, its primary long-term effect is the permanent elimination of existing industrial facilities that pose a risk to surface and groundwater.

Any temporary impacts to water quality associated with the decommissioning of existing oil production facilities—such as the potential for erosion and polluted stormwater runoff—are managed through a comprehensive framework of existing federal, state, and local regulations.

These effects are further minimized through the application of the Project's own enforceable performance standards.

No potentially significant impacts related to hydrology and water quality requiring mitigation were identified.

5.10.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to hydrology and water quality. The less-than-significant findings are supported by the inclusion of Project Design Features (PDFs)—specifically PDF-LU-1 and PDF-LU-2—that are an integral, legally binding part of the Project, as well as mandatory compliance with existing regulatory frameworks governing stormwater runoff and water quality (such as the NPDES Construction General Permit and the County Grading Code). Because the Project does not result in significant impacts to hydrology and water quality, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.10.7 Level of Significance After Mitigation

No significant unavoidable adverse impacts related to hydrology and water quality have been identified. The Project's effects—both individually and cumulatively—are expected to be beneficial over the long term, as potential sources of surface and groundwater contamination are permanently removed and remediated, resulting in a higher level of protection for the region's water resources.

5.10.8 References

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CHAPTER 5.11 LAND USE AND PLANNING

This section of the Environmental Impact Report (EIR) evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to land use and planning in the unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would physically divide an established community or conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

This analysis evaluates the Project's effect as a regulatory action that uses the County's zoning authority to resolve existing land use incompatibilities. The long-term effect of the Project will be a fundamental change in land use at the affected sites, transitioning them from active industrial operations to a restored condition consistent with the General Plan.

This chapter is organized to present the environmental and regulatory setting relevant to land use and planning; the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA); the methods and assumptions used to assess potential impacts; and the results of the impact analysis.

This analysis is based on the Project Description, which includes amendments to the General Plan and Zoning Code (Title 22). It also draws upon the parcel-level data on existing land use conflicts detailed in Appendix A, as well as the General Plan, the Baldwin Hills CSD, the Newhall Ranch Specific Plan, and the Southern California Association of Governments' (SCAG) 2024–2050 Connect SoCal Plan.

Several agencies and organizations, including the City of Culver City, Hills For Everyone, and the California Independent Petroleum Association, submitted comments regarding land use and planning, as detailed in Table 2-1: Summary of Scoping Comments Received. Key issues raised include the project's consistency with local and County general plans, the need for coordination between public agencies, and questions about future land use designations and zoning for the properties after oil operations cease. This chapter analyzes the Project’s potential to conflict with existing land use plans and policies and addresses the planning considerations raised during scoping.

5.11.1 Environmental Setting

5.11.1.1 Regulatory Setting

Federal Regulations

Although the California Environmental Quality Act (CEQA) is a state-level statute, land use on federally owned and managed lands is governed by a distinct framework of federal laws and plans. Local land use authority, such as that exercised by the County through the Project, does not extend to these federal lands. However, because the overall goal of the Project is a countywide phase-out of oil and gas, and because a few existing wells identified in Appendix A are located on federal lands, the federal land use plans and management acts that govern these properties are relevant to the comprehensive analysis in this EIR.

U.S. Forest Service (USFS) – National Forest Management Act

The National Forest Management Act (NFMA) requires the U.S. Forest Service to develop a Land and Resource Management Plan for each national forest. These plans function as the primary land use and zoning documents for National Forest lands, guiding decisions on resource management, recreation, and permitted activities, including mineral extraction. This act is directly relevant because Appendix A identifies several oil and gas sites located within the Angeles National Forest. While the County's ordinance cannot compel action on these federal lands, the eventual decommissioning of these wells would be subject to the policies and approval of the U.S. Forest Service, consistent with its Land and Resource Management Plan.

National Park Service (NPS) – Organic Act

The National Park Service Organic Act of 1916 establishes the mission of the NPS to conserve scenery, natural and historic objects, and wildlife for the enjoyment of future generations. This mission guides all land use planning within National Park System units. This is relevant because Appendix A identifies wells located within the Santa Monica Mountains National Recreation Area, which is administered by the NPS. Any actions to decommission these wells would be subject to NPS review to ensure consistency with the agency's primary conservation and recreation mandate.

Department of Veterans Affairs (VA) Property Management

Land and facilities under the jurisdiction of federal civilian agencies like the Department of Veterans Affairs are managed according to federal property management regulations and the specific mission of the agency. This is directly relevant as Appendix A identifies the Sawtelle Oil Field, located on the federally owned West Los Angeles – Sawtelle Veterans Affairs property. The County has no land use authority at this site, and the future of these wells will be determined by the VA through its own federal planning and property management processes.

National Environmental Policy Act (NEPA)

NEPA is the federal law requiring federal agencies to assess the environmental effects of their proposed actions. Any discretionary action by a federal agency, such as approving a well abandonment plan, requires an environmental review under NEPA. Therefore, a decision by the

U.S. Forest Service, National Park Service, or Department of Veterans Affairs to decommission the wells located on their respective lands would constitute a federal action requiring its own environmental review under NEPA.

Summary of Federal Land Use and Planning Considerations

While the County's ordinance does not apply to federal lands, the federal government has its own comprehensive planning frameworks that govern the management of its properties. For the small number of oil and gas facilities identified in Appendix A that are located on federal land, any future decommissioning would require coordination with, and approval from, the relevant federal land management agency (e.g., USFS, NPS, VA) and would be subject to that agency's specific land use plans and federal environmental review processes under NEPA.

State and Regional Regulations

State Planning and Zoning Law

State planning law (California Government Code § 65300 et seq.) requires every county to adopt a comprehensive, long-term general plan for its physical development. The general plan must consist of an integrated and internally consistent set of goals and policies. The Project is a direct action to implement and ensure consistency with the General Plan. A key component of the Project is a General Plan Amendment designed to align the County's primary planning document with the policy of phasing out oil and gas operations, thereby resolving conflicts with the General Plan's goals for public health, safety, and environmental protection.

Recent Complementary Legislation

Recent state legislation has confirmed the legal basis for the Project and reinforced the state's policy direction on land use compatibility for oil and gas operations:

- SB 1137 (Health Protection Zones): This 2022 law established a 3,200-foot setback between new oil wells and sensitive land uses like homes and schools. Following the withdrawal of a referendum in June 2024, the law is now fully in effect and represents a significant, active state-level land use policy aimed at resolving the same types of land use conflicts that the Project addresses.
- AB 3233 (Local Authority): This 2024 law explicitly confirms the authority of local governments like Los Angeles County to use their zoning power to regulate and prohibit oil and gas operations, providing a clear legal basis for the Project.

Southern California Association of Governments (SCAG)

SCAG is the metropolitan planning organization (MPO) for the six-county region that includes Los Angeles County. Under state law (SB 375), SCAG is responsible for preparing a long-range Regional Transportation Plan (RTP) that integrates transportation and land use planning. A required element of the RTP is the Sustainable Communities Strategy (SCS), which sets forth a

forecasted development pattern designed to reduce vehicle miles traveled (VMT) and achieve regional GHG reduction targets.

The current regional plan is the 2024–2050 Connect SoCal Plan. This plan provides a regional investment framework to address transportation challenges while enhancing sustainability. Its core strategy recommends that local jurisdictions accommodate future growth within existing urbanized areas, particularly near public transit, to reduce VMT and congestion. The Project is consistent with the broad goals of Connect SoCal. By phasing out a sprawling and incompatible industrial land use, the Project supports the plan's goals of promoting healthy and equitable communities and conserving natural lands. It also makes parcels available for potential future uses that could be more consistent with the plan's vision for efficient land use patterns.

Summary of State and Regional Land Use and Planning Considerations

State law provides the foundational framework for all local land use planning in California, requiring counties to adopt and maintain a comprehensive and internally consistent general plan. The Project is a direct action to implement the policies of the General Plan and includes a General Plan Amendment to ensure its full consistency. On a regional level, the Project is consistent with the broad goals of SCAG's Connect SoCal Plan to promote healthier and more sustainable land use patterns. Furthermore, recent state legislation has reinforced this approach by establishing land use standards for oil and gas facilities and confirming the County's authority to enact the Project. Together, this state and regional framework provides both the legal authority and the policy direction for the Project's land use actions.

Local Regulations

The County's primary tools for managing land use are the General Plan, which provides the overarching policy framework, and the County Code (Title 22, Planning and Zoning), which provides specific, enforceable regulations. The Project is a direct action to amend and implement these foundational documents to resolve existing land use conflicts and align the County's planning framework with its public health and environmental goals.

General Plan

The General Plan establishes the long-range vision for how and where the unincorporated areas will grow and change through the year 2035. It consists of a series of elements that contain goals, policies, and programs to foster healthy, livable, and sustainable communities. The Project is directly related to several of these elements:

- Land Use Element: This element provides strategies and planning tools to guide future development. Its Land Use Policy Map and Legend serve as the “blueprint” for how land will be used. The Project resolves fundamental conflicts between the existing heavy industrial nature of oil and gas production and the underlying General Plan land use designations for the affected parcels, which are often Residential, Open Space, or Agricultural.

- Safety Element: The purpose of this element is to reduce the potential risk to the public from natural and human-made hazards. It includes policies to protect the community from risks associated with industrial facilities and the management of hazardous materials. The Project helps implement these policies by phasing out a land use with inherent operational hazards.
- Conservation and Natural Resources Element: This element guides the long-term conservation of natural resources, including mineral and energy resources. A key component of the Project is an amendment to this element to align the County's policies on mineral resources with the managed phase-out of oil and gas extraction.

The Project is fundamentally an action to implement the goals of these General Plan elements. It includes a General Plan Amendment to ensure that the County's land use policies are fully and consistently aligned with the phase-out of oil and gas operations, thereby resolving conflicts with the General Plan's goals for public health, safety, and environmental protection.

Los Angeles County Code (Title 22 – Planning and Zoning)

The Zoning Code is the primary legal tool for implementing the General Plan. It includes regulations concerning where and under what conditions various land uses may occur in the unincorporated areas. The Project is a direct amendment to this code. Its core mechanism is to designate all existing oil and gas facilities as legal nonconforming uses. This is a standard zoning tool used to phase out land uses that were legally established but are no longer consistent with the long-term vision for a community as established in an updated General Plan.

- Community Standards Districts (CSDs): CSDs are overlay zones that provide community-specific regulations exceeding baseline County standards. The Project also includes specific amendments to local zoning overlays to ensure countywide consistency, including for the Baldwin Hills CSD and the Newhall Ranch Specific Plan.

Other Relevant County Plans and Programs

OurCounty – Countywide Sustainability Plan: This plan outlines a broad, long-range vision for a more sustainable and equitable region. The Project is a direct implementation of the plan's goals, particularly Goal 1: "A fossil fuel-free LA County."

Green Zones Program: This program amends the Zoning Code to improve public health in vulnerable communities by limiting the impacts of incompatible industrial land uses. The Project is consistent with and strongly supports the goals of the Green Zones program by phasing out the types of industrial operations that the program seeks to buffer from sensitive uses.

Summary of Local Land Use and Planning Considerations

The County's local regulations provide a comprehensive framework for land use and planning, led by the foundational policies of the General Plan and implemented through the specific, enforceable ordinances of the Zoning Code (Title 22). The Project is a direct action to amend these documents. Its core mechanism is the use of the County's zoning authority to designate existing oil and gas

facilities as legal nonconforming uses, providing a structured process for their phase-out. This action is further supported by and consistent with the goals of other key County initiatives, such as the OurCounty Sustainability Plan and the Green Zones Program. Together, this local framework provides both the legal basis and the clear policy direction for the Project's land use actions.

5.11.1.2 Existing Environmental Conditions

The existing land use setting for the Project encompasses the vast and diverse unincorporated areas of Los Angeles County. The CEQA baseline for this analysis is defined by the physical arrangement of land uses and the underlying zoning that governs them. A defining characteristic of this baseline is the long-standing juxtaposition of industrial oil and gas extraction operations with a wide variety of other, often sensitive, land uses such as residential neighborhoods, schools, parks, and open space preserves. This has created significant land use incompatibilities that the Project is designed to resolve.

The following discussion summarizes the existing land use patterns and the specific context of oil and gas operations within each of the County's Planning Areas. A detailed parcel-level inventory of all sites subject to the Project is provided in Appendix A: Existing Conditions Site Inventory. The mention of "islands" refers to unincorporated areas that are partially or wholly surrounded by incorporated cities.

Antelope Valley Planning Area

The Antelope Valley Planning Area, the County's largest, is located in the northern portion of Los Angeles County, bordering Kern, San Bernardino, and Ventura counties. The area is predominantly rural, characterized by the open desert of the Antelope Valley, the Sierra Pelona and Tehachapi Mountains, and the Angeles National Forest to the south. The primary land uses include undeveloped open space, government uses (National Forest, Edwards Air Force Base), single-family residences, and active agriculture, which is more prevalent here than in any other part of the Los Angeles County. Unincorporated communities include Quartz Hill, Leona Valley, Little Rock, Gorman, and Lake Los Angeles.

Oil and gas operations in this Planning Area are limited. The few existing wells are generally situated in remote areas, either near scattered rural residences or on public lands administered by the U.S. Forest Service and the California Department of Parks and Recreation (Hungry Valley State Vehicular Recreation Area). Land use conflicts are therefore less pronounced than in the County's more urbanized areas.

Coastal Islands Planning Area

This Planning Area consists of San Clemente Island, which is owned and operated by the U.S. Navy, and Santa Catalina Island. Both islands are almost entirely undeveloped open space, except for the City of Avalon and the small unincorporated community of Two Harbors on Santa Catalina Island.

There are no active or idle oil and gas facilities subject to the Project located in this Planning Area.

East San Gabriel Valley Planning Area

Located at the eastern edge of Los Angeles County, this Planning Area includes the eastern San Gabriel Valley and the Puente Hills. It is highly urbanized and comprised of numerous cities and large unincorporated communities, most notably Hacienda Heights and Rowland Heights. These communities are largely suburban in character, dominated by single-family residential uses but also containing significant concentrations of commercial, institutional, and open space uses, including Cal Poly Pomona and Rose Hills Memorial Park.

Oil and gas operations in this area are concentrated in the Whittier Oil Field, located within the Puente Hills. These operations are situated on steep hillside terrain immediately adjacent to established suburban neighborhoods in Hacienda Heights and Rowland Heights. The primary land use conflict is the intrusion of an industrial use into an area designated as a Significant Ecological Area (SEA) and valued for its residential character and scenic open space.

Gateway Planning Area

The Gateway Planning Area is a densely developed, heavily industrialized region in the southeastern portion of Los Angeles County. The unincorporated communities, such as South Whittier-Sunshine Acres, West Whittier-Los Nietos, and Rancho Dominguez, are a mix of suburban residential neighborhoods and major industrial corridors.

Active oil wells exist in unincorporated "islands" associated with the Montebello and Dominguez Oil Fields. These industrial facilities are interspersed within a dense fabric of single-family homes, apartment complexes, commercial businesses, and institutional land uses, creating direct land use incompatibilities. The community of Rancho Dominguez, which is predominantly industrial, also contains large mobile home parks in close proximity to oil operations.

Metro Planning Area

Located in the geographic center of Los Angeles County, the Metro Planning Area is almost entirely built out and includes some of the region's most densely populated communities. Unincorporated areas include East Los Angeles, Florence-Firestone, West Athens-Westmont, and Willowbrook, which are characterized by a mix of high-density multi-family and single-family residential uses, active commercial corridors, and industrial zones. For example, Florence-Firestone is predominantly multi-family residential, with industrial uses concentrated along Alameda Street and the Metro A Line (Blue) right-of-way.

This urbanized area contains portions of the Dominguez, Howard Townsite, and Rosecrans Oil Fields. Wells and production facilities are situated directly adjacent to high-density residential

neighborhoods, public schools (such as the Los Angeles Adventist Academy), cemeteries, and major manufacturing facilities. This represents one of the most complex and acute examples of land use incompatibility in Los Angeles County, with sensitive receptors located in immediate proximity to active industrial operations.

San Fernando Valley Planning Area

This Planning Area is largely comprises cities, with unincorporated areas located at its periphery. These unincorporated communities, such as Oat Mountain, West Chatsworth, and La Crescenta-Montrose, are primarily low-density residential areas or undeveloped open space. The Oat Mountain area also includes the Sunshine Canyon Landfill.

This area contains the Oat Mountain and Newhall Oil Fields. Operations are generally located in the Santa Susana Mountains to the north of the valley's dense suburban communities, including Porter Ranch and Granada Hills. The Aliso Canyon Oil Field, which has been repurposed for natural gas storage, is also located here. The primary land use conflict involves industrial operations occurring within or adjacent to areas valued for their scenic and recreational open space.

Santa Clarita Valley Planning Area

The County's second-largest planning area, the Santa Clarita Valley has a long history of significant oil production. The area is characterized by the City of Santa Clarita, expanding master-planned residential communities, major commercial centers like Six Flags Magic Mountain, and vast areas of mountainous open space. Rural canyon unincorporated neighborhoods such as Agua Dulce and Val Verde consist of low-density residential and farming uses surrounded by undeveloped land.

This region contains numerous legacy oil fields, including the Pico Canyon, Wiley Canyon, and Placerita Canyon fields. These aging industrial operations are now directly adjacent to newly developed residential neighborhoods, commercial centers, parks (like Castaic Sports Complex), and recreational facilities. Furthermore, the Newhall Ranch Specific Plan area, a large-scale planned community, contains existing oil operations that are a specific subject of the Project's regulatory amendments, representing a direct conflict between legacy industrial use and future planned land uses.

Santa Monica Mountains Planning Area

Valued for its significant scenic, recreational, and ecological resources, most of this Planning Area is undeveloped and preserved as part of the Santa Monica Mountains National Recreation Area and various state parks. The limited development consists of scattered single-family residential and small-scale agricultural uses, generally located in small canyons and valleys.

Oil production in this area is limited and located primarily along its northern foothills. The primary land use conflict is the presence of industrial operations in proximity to land designated for permanent preservation and public recreation.

South Bay Planning Area

The South Bay is a densely populated area that is largely built out with residential, commercial, and industrial uses. Unincorporated communities include Lennox, Del Aire, Alondra Park, and the largest, West Carson. West Carson contains a wide range of land uses, including a large concentration of medical facilities centered on Harbor-UCLA Medical Center.

This area includes a portion of Wilmington Oil Field, as well as wells from the Torrance and Lawndale Oil Fields. In communities like West Carson, these facilities are interspersed with a dense mix of single-family homes, apartment buildings, mobilehome parks, commercial strips, and industrial parks, creating direct adjacencies between industrial hazards and sensitive populations.

West San Gabriel Valley Planning Area

This Planning Area is almost entirely built out and largely comprise cities. Unincorporated communities include Altadena, an older, large suburban community, and the South San Gabriel and Whittier Narrows areas.

This area includes the western extent of the Montebello Oil Field, which is bordered by urban development. It also contains wells located within the Whittier Narrows Recreation Area, a major regional park managed by the County Department of Parks and Recreation, representing a direct conflict between industrial and recreational land uses.

Westside Planning Area

This area is dominated by the Inglewood Oil Field, one of the largest urban oil fields in the United States. The field covers nearly 1,000 acres within a densely populated landscape, creating a distinct and significant land use incompatibility. It is immediately bordered by the unincorporated communities of View Park-Windsor Hills, Baldwin Hills, and Ladera Heights, as well as the City of Culver City. The field is also adjacent to the Kenneth Hahn State Recreation Area. This juxtaposition of a major industrial facility with dense residential neighborhoods and a major regional park represents the most significant land use conflict addressed by the Project. Legacy wells associated with the Playa del Rey and Sawtelle fields are also in this planning area, including on the Sawtelle Veterans Affairs property.

5.11.2 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this EIR, implementation of the Project may have a significant adverse impact on land use and planning if it would result in any of the following:

LU-1 Physically divide an established community.

LU-2 Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

LU-3 Conflict with any applicable habitat conservation plan or natural community conservation plan.

5.11.3 Environmental Impacts

5.11.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR evaluated the land use implications of phasing out fossil fuel infrastructure and concluded that the implementation of the CAP would not physically divide an established community and would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect (CAP PEIR, 3.12-14 to 3.12-22). The CAP PEIR determined that these programmatic land use impacts were less than significant. Therefore, this analysis strictly evaluates the incremental short-term land use implications of ROWO's decommissioning activities against the permanent land use compatibility benefits, consistent with the CAP PEIR's findings. Because any temporary decommissioning activities are strictly governed by the Project's enforceable Project Design Features (PDFs) and existing regulations, this analysis focuses on demonstrating how these built-in frameworks ensure land use impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The analysis of impacts to land use and planning is qualitative and policy-based, which is appropriate for a program-level EIR evaluating a regulatory action like the Revised Oil Well Ordinance. The methodology focuses on whether the Project would conflict with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. The evaluation considers the Project's role in resolving existing land use incompatibilities between industrial oil production and surrounding sensitive land uses. Because the Project is a policy document and does not propose site-specific development, this EIR does not assess the construction and operation details of potential future development within the Project area; analysis at a parcel-specific level was not conducted because the actual locations and timing of future activities are speculative. Pursuant to CEQA Guidelines Section 15145, this analysis does

not speculate on the project-specific impacts of any potential future development that may be proposed on these sites after restoration is complete. Any subsequent proposals for specific development projects will be subject to a separate, project-specific environmental review pursuant to CEQA at the time they are proposed.

For the purposes of this EIR, the evaluation of the Project's potential to physically divide an established community is based on whether the Project would construct new linear transportation infrastructure (e.g., roads, railways) or other physical barriers that would truncate or interrupt connectivity within an existing community. Furthermore, a conflict with an applicable land use plan is not considered a significant impact unless it would result in an adverse physical change to the environment, as stated in CEQA Guidelines Section 15382. The evaluation under Threshold LU-2 assesses the potential for the Revised Oil Well Ordinance to interfere with land use plans adopted for the purpose of avoiding or mitigating an environmental effect, such that a significant environmental effect would result.

This section focuses on direct land use impacts. Indirect or secondary effects resulting from the Project's implementation are addressed in other topical sections of this EIR. For example, air quality impacts resulting from temporary decommissioning activities are discussed in Section 5.3, Air Quality, and transportation impacts are discussed in Section 5.15, Transportation. The analysis is based on a review of the Project Description (Chapter 3), the Environmental Setting (Chapter 4), Appendix A (Existing Conditions Site Inventory), the General Plan, the Los Angeles County Code, Title 22 (Planning and Zoning), and the Southern California Association of Governments' (SCAG) 2024–2050 Connect SoCal plan.

5.11.3.2 Project Characteristics

The Project is a comprehensive regulatory and land use planning action initiated by the County of Los Angeles. Its primary characteristics relevant to this land use and planning analysis are the direct amendments it makes to the County's foundational planning documents to resolve existing land use conflicts. The Project consists of an ordinance amending Title 22 (Planning and Zoning) and a corresponding General Plan Amendment.

The core land use mechanisms and outcomes of the Project include:

- Prohibition of New Oil Wells: The ordinance prohibits the establishment of any new oil wells or associated production facilities in all unincorporated areas of Los Angeles County, except the Coastal Zone. This action directly governs future land use patterns by preventing the introduction of new, incompatible industrial uses.
- Designation as a Nonconforming Use: The Project uses the County's zoning authority to designate all existing, legally established oil wells and facilities as legal nonconforming uses. This is a standard planning tool used to manage land uses that were established prior to the adoption of new zoning regulations with which they no longer comply.
- Amortization and Phase-Out: As nonconforming uses, the existing facilities are subject to removal after a 20-year amortization period. This establishes a clear, structured timeline for the land use transition.

- Mandatory Decommissioning and Restoration (PDF-LU-1 and PDF-LU-2): The Project creates a non-discretionary mandate for the complete plugging of wells, removal of all associated infrastructure, and the full remediation and restoration of all sites upon cessation of activities.
- Amendments to Specific Land Use Plans: The Project includes targeted amendments to local land use plans to ensure countywide consistency, including for the Baldwin Hills Community Standards District (CSD) and the Newhall Ranch Specific Plan.
- General Plan Amendment: A key component of the Project is a comprehensive amendment to the Land Use, Conservation and Natural Resources, and Safety Elements of the General Plan. This action is designed to ensure internal consistency by removing policies that previously supported oil production and formally establishing the new policy of phasing out oil and gas operations.

5.11.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance, well abandonment, bonding, and restoration, which apply throughout the decommissioning process.

From a land use and planning perspective, the Project is expected to result in two primary types of effects:

- Short-term site management activities, which may occur during the decommissioning of existing facilities. These temporary activities, such as equipment removal and grading, are consistent with industrial site closure and do not alter underlying land use designations or create new permanent land use conflicts.
- Long-term beneficial changes to land use compatibility, including the removal of incompatible industrial operations from residential, recreational, and open space areas. These actions directly resolve existing land use conflicts, ensure consistency between on-the-ground conditions and the County's amended General Plan, and transition formerly industrial parcels to a restored state available for compatible future uses.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds for land use and planning identified in Section 5.11.2. The analysis uses a qualitative, policy-based approach to assess the Project's consistency with the General Plan, the Zoning Code, and other applicable land use regulations.

Impact 5.11-1: Would the proposed Project physically divide an established community? [Threshold LU-1]

No Impact.

The physical division of an established community typically occurs through the construction of large-scale, linear infrastructure, such as a new freeway, railroad, or flood control channel, which creates a physical barrier that severs existing circulation patterns and can isolate portions of a neighborhood.

The Project is a regulatory action that consists of a new ordinance amending the Zoning Code (Title 22) and corresponding amendments to the General Plan. The Project does not propose or authorize the construction of any new physical infrastructure that could divide a community. The reasonably foreseeable physical activities resulting from the Project are limited to the decommissioning and restoration of existing oil well sites.

On the contrary, the long-term implementation of the Project would have a beneficial effect on community cohesion by removing existing industrial facilities that currently function as physical and visual barriers. The most prominent example is the Inglewood Oil Field, a nearly 1,000-acre industrial use embedded within a densely populated urban landscape. This facility currently creates a significant barrier between the unincorporated communities of View Park-Windsor Hills and Ladera Heights, the City of Culver City, and major regional amenities like the Kenneth Hahn State Recreation Area. The phased decommissioning and restoration of this and other oil fields will remove these industrial barriers, improving connectivity and making the land available for future uses that are compatible with the surrounding community character.

Because the Project does not construct any new physical barriers and instead facilitates the removal of existing ones, it would have no impact with respect to physically dividing an established community.

Impact 5.11-2: Would the proposed Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? [Threshold LU-2]

Less Than Significant Impact.

A significant impact would occur if the Project were to conflict with the goals or policies of an applicable land use plan, such as the General Plan or Zoning Code, in a way that causes an adverse physical change to the environment. Under existing conditions, a potential inconsistency exists between some of the County's current General Plan policies that accommodate mineral resource extraction and goals for public health, sustainability, and environmental justice.

The Project's fundamental purpose is to resolve this inconsistency through direct amendments to the County's foundational planning documents. The Project is not only consistent with the County's planning framework but is the primary mechanism for ensuring its internal consistency. Key components of the Project are specifically designed to align County policy with the managed phase-out of oil and gas operations, including:

- A General Plan Amendment to the Land Use, Conservation and Natural Resources, and Safety Elements to formally prohibit new oil well operations and remove policies that previously supported oil production activities.
- An amendment to Title 22 (Planning and Zoning) that designates existing oil and gas facilities as legal nonconforming uses, providing a standard zoning mechanism for their orderly phase-out.
- Targeted amendments to the Baldwin Hills CSD and the Newhall Ranch Specific Plan to ensure that local land use regulations are consistent with the new countywide ordinance.

Upon adoption, the Project will be fully and internally consistent with the County's amended land use plans, thereby eliminating the baseline policy conflict.

Furthermore, the Project is consistent with and directly implements the goals of other key County and regional plans adopted for sustainability and environmental protection:

- 2045 Climate Action Plan (CAP): The Project is the direct regulatory execution of Measure ES1 of the CAP. As explicitly determined in the CAP PEIR from which this document tiers, the implementation of Measure ES1 is fully consistent with regional and local plans adopted to mitigate environmental effects, including SCAG's RTP/SCS Goal 5 and General Plan Policy AQ 3.8 (CAP PEIR, Table 3.12-2, p. 3.12-20). The Project resolves the core on-the-ground land use conflict between existing industrial oil operations and the land uses that often surround them, directly supporting the primary purpose of land use planning.
- OurCounty Sustainability Plan: The Project is a key action in achieving Goal 1 ("A fossil fuel-free LA County") and Goal 2 ("Healthy and safe communities").
- SCAG's Connect SoCal Plan: The Project is consistent with the regional goals of improving public health in environmental justice communities and reducing the impacts of incompatible land uses.

Finally, the Project resolves the core on-the-ground land use conflict between existing industrial oil operations and the sensitive land uses that often surround them, such as residential areas, schools, and parks. This action directly supports the primary purpose of land use planning, which is to ensure the compatibility of adjacent uses.

Because the Project's core function is to create consistency within the County's planning framework and resolve long-standing land use conflicts, its impact is less than significant.

Impact 5.11-3: Would the proposed Project conflict with any applicable habitat conservation plan or natural community conservation plan? [Threshold LU-3]

No Impact.

A significant impact would occur if the Project authorized development or land uses that were inconsistent with the conservation strategies or land use restrictions of an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP).

The Project is a regulatory action to prohibit new oil wells and phase out existing oil production operations; it does not authorize any new development, grading, or land use changes that could conflict with an HCP or NCCP. While portions of unincorporated Los Angeles County are located

within or near the boundaries of adopted conservation plans, such as the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan, the Project does not interfere with the provisions or biological goals of these plans.

On the contrary, the Project is consistent with the conservation objectives of such plans. By requiring the removal of incompatible industrial infrastructure, the Project reduces long-term habitat fragmentation, sources of potential contamination, and human activity in areas intended for conservation. This action supports the long-term biological goals of HCPs and NCCPs.

Furthermore, the Project specifically includes amendments to the Newhall Ranch Specific Plan to ensure that its land use regulations are fully aligned with the county-wide phase-out of oil and gas operations, demonstrating a direct effort to ensure consistency rather than create conflict. Any future site-specific decommissioning activities or subsequent redevelopment proposals within an HCP or NCCP boundary would remain fully subject to the provisions of that plan and would undergo separate environmental review to ensure compliance.

Because the Project does not authorize any conflicting activities and its long-term effects support the goals of habitat conservation, it would result in no impact.

5.11.4 Cumulative Impacts

A cumulative land use impact would occur if the Project, in combination with other past, present, and reasonably foreseeable future projects, would result in a cumulatively considerable conflict with applicable land use plans, policies, or regulations. The geographic scope for this analysis is Los Angeles County and the broader Southern California region, which is subject to a coordinated planning framework guided by the Southern California Association of Governments (SCAG).

The cumulative context is one of continued growth and development across the region. Reasonably foreseeable projects, including residential, commercial, and infrastructure development, will be subject to review for consistency with the general plans of their respective jurisdictions. These local plans are, in turn, guided by the regional goals of SCAG's 2024–2050 Connect SoCal plan, which encourages efficient land use patterns and directs growth toward existing urbanized areas to promote public health and sustainability. This regulatory framework is designed to ensure that new development does not create widespread land use conflicts.

As established in the analysis for Impact 5.11-2, the Project would not conflict with any applicable land use plans, policies, or regulations. On the contrary, the Project is a direct action to resolve existing inconsistencies and land use conflicts. Its core components include a General Plan Amendment and a Zoning Code Amendment specifically designed to ensure the County's planning framework is internally consistent with the phase-out of an incompatible industrial land use.

The Project's incremental contribution to the cumulative land use condition is therefore beneficial, not adverse. By removing industrial oil and gas operations from areas often designated for residential, recreational, or open space use, the Project helps achieve the primary goal of land use planning: ensuring the compatibility of adjacent uses. This action aligns with the regional goals of SCAG's Connect SoCal plan and directly implements the County's own adopted sustainability and climate action plans.

Because the Project is consistent with all applicable land use plans and its primary function is to resolve, rather than create, land use conflicts, its incremental effect is not cumulatively considerable. Therefore, the Project would not contribute to a significant cumulative impact related to land use and planning. The cumulative impact is less than significant.

5.11.5 Level of Significance Before Mitigation

Based on the analysis presented in this chapter, all potential impacts related to land use and planning are determined to be less than significant or no impact.

The Project would have no impact with respect to physically dividing an established community, as it is a regulatory action that does not construct any new physical barriers. The Project would also have no impact with respect to conflicting with an applicable Habitat Conservation Plan or Natural Community Conservation Plan, as its actions are consistent with the conservation goals of such plans.

The Project would have a less than significant impact regarding conflicts with applicable land use plans and policies. The Project's fundamental purpose is to resolve existing policy inconsistencies through direct amendments to the General Plan and Zoning Code, ensuring full consistency upon adoption.

The Project's contribution to cumulative land use impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant, no mitigation measures are required.

5.11.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to land use and planning.

The Project itself is a comprehensive planning action designed to resolve existing land use conflicts and ensure consistency within the County's regulatory framework. The Project's built-in safeguards include direct amendments to the General Plan and the Title 22 Zoning Code, including mandatory performance standards for decommissioning and infrastructure removal (PDF-LU-1 and PDF-LU-2), which are the primary mechanisms for avoiding long-term land use conflicts. All

future activities resulting from the Project, including site decommissioning and any potential subsequent development, would be subject to all applicable County land use regulations, ensuring that no new significant impacts would occur. Because the Project does not result in significant impacts to land use and planning, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.11.7 Level of Significance After Mitigation

All potential impacts related to land use and planning were determined to be less than significant or no impact without the need for mitigation measures. Therefore, the level of significance remains less than significant.

No significant and unavoidable adverse impacts related to land use and planning have been identified. The Project's overall effect is beneficial from a land use and planning perspective, as its primary purpose is to resolve existing land use incompatibilities and ensure the General Plan and Zoning Code are internally consistent.

5.11.8 References

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CHAPTER 5.12 MINERAL RESOURCES

This section evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts related to mineral resources. The analysis focuses on whether the Project would result in the loss of availability of a known mineral resource of value to the region and the state, or the loss of a locally important mineral resource recovery site. Under the California Environmental Quality Act (CEQA), such a loss is considered a potentially significant environmental impact.

The Project's fundamental purpose is to protect public health, safety, and the environment by prohibiting new oil and gas production and phasing out existing operations. A direct and unavoidable consequence of this action is that the remaining oil and gas reserves at these sites will be rendered unavailable for extraction. This analysis will therefore conclude that the Project would result in a significant and unavoidable impact on mineral resources. This chapter describes the environmental and regulatory setting, the thresholds used to evaluate significance, the methods used in the evaluation, and the results of the impact assessment.

The County's Initial Study identified that the proposed ordinance could result in a significant environmental impact by limiting access to mineral resources. This determination led to the preparation of this Environmental Impact Report. During the scoping period, several individuals and organizations submitted comments opposing the project because it would result in the loss of access to local oil and gas resources (see Table 2-1: Summary of Scoping Comments Received). These comments highlighted the economic importance of these resources for energy and the production of goods. This chapter provides a detailed analysis of this impact.

5.12.1 Environmental Setting

5.12.1.1 Regulatory Setting

Federal Regulations

No federal regulations governing mineral resources are directly applicable to the County's Proposed Project.

Federal laws, such as the Mineral Leasing Act of 1920, govern the extraction of oil and gas resources on federally owned and managed lands. The Project is a local land use ordinance enacted under the County's zoning authority and applies only to unincorporated areas under its

jurisdiction, which consist almost entirely of private lands. The County's ordinance has no legal authority over federal lands.

While the inventory of affected sites in Appendix A identifies a small number of oil and gas facilities located on federal parcels (e.g., within the Angeles National Forest), any future action to decommission these specific wells would be a federal decision. Such an action would be governed by the respective federal agency's own land use and resource management plans and would require a separate environmental review under the National Environmental Policy Act (NEPA). Because of this jurisdictional separation, this EIR analysis focuses on the state and local regulatory frameworks that apply to the Project.

State Regulations

State law provides distinct regulatory frameworks for different types of mineral resources. The extraction of oil and natural gas is governed by the California Geologic Energy Management Division (CalGEM) under the Public Resources Code. The Surface Mining and Reclamation Act (SMARA), in contrast, applies to surface mining operations for non-fuel minerals, such as sand and gravel. As the Proposed Project is focused exclusively on the regulation of oil and gas, SMARA is not an applicable regulation for this analysis, and this section will focus on the authority of CalGEM.

California Geologic Energy Management Division (CalGEM)

CalGEM, a division of the California Department of Conservation, is the state's primary regulator for oil and gas operations. Its mission is to protect public health, safety, and the environment in all matters related to the drilling, operation, maintenance, and permanent closure of oil and natural gas wells. CalGEM's authority is established in the State Public Resources Code (§ 3000 et seq.) and the California Code of Regulations (Title 14, Division 2, Chapter 4).

All well plugging and abandonment activities that would be required by the Proposed Project must be performed in accordance with the detailed technical standards set and enforced by CalGEM. A key component of CalGEM's mandate is the Idle Well Program. Inactive or deserted "idle wells" can pose risks to groundwater and public safety if not properly maintained. To address this, CalGEM's regulations require operators to either conduct stringent integrity tests on idle wells or commit to a firm schedule for their permanent plugging and abandonment.

Surface Mining and Reclamation Act (SMARA)

The Surface Mining and Reclamation Act of 1975 (SMARA) is the State's primary law for the conservation and management of mineral resources. A core objective of SMARA is to prevent the premature loss of significant mineral deposits—including petroleum—due to incompatible land uses. The act requires the State Geologist (at the California Geological Survey) to classify lands based on their mineral content into one of four Mineral Resource Zones (MRZs):

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present or likely to be present.

- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present or there is a high likelihood of their presence. Development in these zones is meant to be managed to ensure the resource remains available.
- MRZ-3: Areas where the significance of mineral deposits cannot be determined from available data.
- MRZ-4: Areas where there is insufficient data to assign any other MRZ designation.

SMARA's authority, including its MRZ classification system, does not apply to the extraction of oil and gas, which is regulated under a separate division of the Public Resources Code. Because the Proposed Project is exclusively concerned with the regulation of oil and gas facilities, SMARA is not an applicable regulation for this analysis.

Summary of State Mineral Resource Considerations

The primary state-level consideration for the Project is technical compliance with the regulations enforced by CalGEM. State law does not mandate the extraction of oil and gas; rather, it provides the safety and environmental standards that must be followed when extraction occurs and, critically for this Project, when it ceases. The Project is a local land use decision that does not conflict with state law. The physical decommissioning activities required by the Project will be carried out under the direct oversight and according to the mandatory technical standards of CalGEM.

Local Regulations

The County's primary tools for managing mineral resources are the General Plan, which provides the overarching policy framework, and the County Code (Title 22, Planning and Zoning), which provides specific, enforceable regulations. The Proposed Project is a direct action to amend these foundational documents to resolve existing land use conflicts and align the County's planning framework with its public health and environmental goals.

County of Los Angeles General Plan

The General Plan is the primary local planning document that identifies and establishes policies for mineral resources in the unincorporated areas. The Conservation and Natural Resources Element contains goals and policies designed to manage mineral resource extraction in a way that ensures its continued viability while minimizing conflicts with other land uses. Under the current General Plan, oil and gas are formally recognized as valuable local mineral resources. This is most clearly demonstrated on the County’s official Land Use Policy Map, where major oil fields, including the Inglewood Oil Field, are assigned a specific "Mineral Resources" land use designation. This designation has historically guided land use planning to support continued extraction.

The Proposed Project represents a fundamental shift in this local policy direction for oil and gas. A key component of the Project is a General Plan Amendment that will remove the policies and land use designations that support oil production. This amendment will align the General Plan with the

Project's purpose of phasing out oil and gas operations to prioritize other adopted County goals, such as protecting public health and ensuring land use compatibility.

It is important to note that some existing General Plan policies (such as C/NR 10.1 and C/NR 11.1) reference the Surface Mining and Reclamation Act (SMARA) or its terminology (e.g., "MRZ-2s") in the context of oil and gas. As established in the State Regulatory Setting, SMARA does not apply to the regulation of oil and gas resources. These references in the General Plan reflect a common but imprecise historical conflation of all mineral resource planning. For the purposes of this EIR, the County's "Mineral Resources" land use designation is treated as a locally-significant designation based on the General Plan's own authority, independent of SMARA. The Project's proposed General Plan Amendment will resolve these imprecise references as part of its broader update, improving the plan's accuracy and internal consistency.

Existing relevant General Plan goals and policies include:

- Land Use Element
    - Goal LU 7: Compatible land uses that complement neighborhood character and the natural environment.
        - Policy LU 7.5. Ensure land use compatibility in areas adjacent to mineral resources where mineral extraction and production, as well as activities related to the drilling for and production of oil and gas, may occur.
- Conservation and Natural Resources Element
    - Goal C/NR 10: Locally available mineral resources to meet the needs of construction, transportation, and industry.
        - Policy C/NR 10.1: Protect MRZ-2s and access to MRZ-2s from development and discourage incompatible adjacent land uses.
        - Policy C/NR 10.5: Manage mineral resources in a manner that effectively plans for access to, development and conservation of, mineral resources for existing and future generations.
    - Goal C/NR 11: Mineral extraction and production activities that are conducted in a manner that minimizes impacts to the environment.
        - Policy C/NR 11.1. Require mineral resource extraction and production activities and drilling for and production of oil and natural gas to comply with County regulations and state requirements, such as SMARA, and CALGEM regulations.
        - Policy C/NR 11.3. Require appropriate levels of remediation for all publicly-owned oil and natural gas production sites based on possible future uses.
        - Policy C/NR 11.4. Require that mineral resource extraction and production operations as well as activities related to the drilling for and production of oil and natural gas be conducted to protect other natural resources and prevent excessive grading in hillside areas.
        - Policy C/NR 11.5. Encourage and support efforts to increase the safety of oil and gas production and processing activities, including state regulations related to well stimulation techniques such as hydraulic fracturing or "fracking."
- Safety Element
    - Goal S 6: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to human-made hazards.

- Policy S 6.1. Assess public health and safety risks associated with existing oil and gas facilities in the unincorporated Los Angeles County.
- Policy S 6.2. Coordinate with State and regional air quality agencies to ensure funding and implementation of annual inspections, ongoing air monitoring, and health impact assessment data continue to be collected and used to prioritize and facilitate the timely phase out of existing wells.
- Policy S 6.3. Support State and federal policies and proposals that increase funding sources to help plug, abandon, remediate and revitalize idle and orphaned well sites, and advocate for increased funding that will provide critical relief to the County and its residents.

Los Angeles County Code (Title 22 – Planning and Zoning)

The Zoning Code implements the policies of the General Plan. The following sections describe the existing regulatory context that the Project proposes to amend and supersede.

- Existing Oil Well Regulations (Section 22.140.400): This section currently regulates all oil wells in the unincorporated areas, except the Coastal Zone and Specific Plans. Its key provisions establish a tiered permitting system. In heavy agricultural and manufacturing zones (A-2, M-1, M-1.5, M-2), new wells in established oil fields require a ministerial site plan review. A discretionary Conditional Use Permit (CUP) is required for wells outside established fields or for any well in a heavy manufacturing (M-2) zone that is within 300 feet of a school, park, or residential zone.
    - Setbacks: No oil drilling is permitted within 300 feet of a residence, and no well or tank may be placed within 20 feet of a public highway.
    - Enhanced Standards: For drilling within 500 feet of a residence, derricks must be enclosed with soundproofing material, all equipment must use muffled engines or electric motors, and equipment deliveries are restricted to daytime hours.
    - Operational Requirements: The code mandates standards for enclosing earthen sumps, oiling or surfacing access roads, maintaining signs, and ensuring that operations do not constitute a public nuisance.
    - Abandonment: Upon abandonment of a well, the derrick must be removed and the site restored to its original condition as nearly as practicable within 90 days.
- Location-Specific Regulations (Community Standards Districts): To address unique local conditions, the County has adopted CSDs with more stringent rules. The Baldwin Hills CSD was established in 2008 to provide advanced safeguards and controls for the Inglewood Oil Field, given its location within a dense urban area. Its objective is to ensure oil field operations are compatible with surrounding uses by minimizing potential adverse impacts related to noise, air quality, and aesthetics. The Proposed Project includes a specific amendment to the Baldwin Hills CSD to ensure its local regulations are consistent with the new county-wide prohibition and phase-out of oil wells.
- Related Land Use Regulations (Green Zones): The County's Green Zones Program (Chapter 22.84) aims to improve public health in vulnerable communities by limiting the impacts of incompatible industrial land uses. The program establishes Green Zone Districts where certain industrial activities, including oil well valve storage or repair, require a CUP if located within 500 feet of a "sensitive use" (e.g., homes, schools, parks, hospitals). The Project is strongly consistent with the goals of the Green Zones program, as it will phase out the types of industrial operations that the program seeks to buffer from sensitive uses.

Summary of Local Mineral Resource Considerations

The County's local regulatory framework, led by the General Plan and implemented by the Zoning Code, establishes the baseline for mineral resource management and is the primary subject of the Proposed Project. The General Plan formally recognizes the significance of local oil and gas deposits by assigning a "Mineral Resources" land use designation to major oil fields on its official Land Use Policy Map. The Title 22 Zoning Code, in turn, currently provides specific regulations and permitting pathways for the drilling and operation of oil wells.

The Proposed Project is a direct amendment to this existing framework. It represents a foundational policy shift wherein the County is exercising its local land use authority to amend the General Plan and Zoning Code. This action prioritizes other adopted General Plan goals—such as the protection of public health and the promotion of land use compatibility—over the continued extraction of these specific mineral resources. Therefore, the local regulations are the very tools being used to implement the Project's new policy direction.

5.12.1.2 Existing Environmental Conditions

Minerals are naturally occurring chemical elements or compounds formed from inorganic and organic processes. For land use planning purposes, the State of California and the County of Los Angeles recognize two primary categories of mineral resources: non-fuel minerals, primarily construction aggregate (sand and gravel), and fuel minerals, which include oil and natural gas. While the Project only pertains to oil and gas, the following provides a comprehensive overview of the County’s mineral resource setting.

Aggregate and Other Non-Fuel Mineral Resources

The California Geological Survey (CGS), as mandated by the Surface Mining and Reclamation Act (SMARA), classifies lands containing significant non-fuel mineral resources. This is particularly important for construction aggregate, for which the CGS designates Production-Consumption (P-C) regions to balance supply with urban demand. Los Angeles County contains portions of seven P-C regions, including the San Fernando Valley, San Gabriel Valley, and Saugus-Newhall regions. Within these regions, lands with significant aggregate deposits are designated as Mineral Resource Zone 2 (MRZ-2). These MRZ-2 zones for aggregate are concentrated in specific planning areas:

- Antelope Valley: MRZ-2 areas are in the Little Rock Wash and Big Rock Wash, where one active mine, the Big Rock Creek Mine, is located.
- East and West San Gabriel Valley: Nearly all MRZ-2 areas are located within the alluvial plains of the San Gabriel River and are largely developed with a mix of residential, commercial, and industrial uses. Major sand and gravel extraction sites are in and near the City of Irwindale.
- San Fernando Valley: MRZ-2 areas are in Kagel Canyon and Pacoima Canyon, as well as the alluvial fan of the Tujunga Wash.
- Santa Clarita Valley: MRZ-2 areas are located along the Santa Clara River floodplain, much of which is developed with agricultural uses or is vacant. The Soledad Canyon Mine is an active mine in this area.

While these aggregate resources are vital to the region's economy, the Proposed Project is focused exclusively on the regulation of oil and gas extraction. It would not affect the availability or accessibility of these sand and gravel resources or any other non-fuel mineral resources in the County. Therefore, aggregate resources are not discussed further in this analysis.

Oil and Natural Gas Resources

The primary mineral resources relevant to this Project are crude oil and natural gas. Oil production has been a significant component of the County's landscape and economy for over a century. The baseline condition is one in which these non-renewable fossil fuel resources are actively being extracted and are considered available for continued and future extraction, subject to the existing regulatory framework. This resource is currently accessed via active and idle oil and gas wells located on 248 distinct parcels distributed across 10 of the County's 11 Planning Areas. The complete inventory of these sites is provided in Appendix A.

The General Plan Land Use Policy Map delineates several areas containing major oil fields, such as the Inglewood Oil Field, with a specific "Mineral Resources" land use designation. This designation formally acknowledges the presence of a valuable resource and has historically guided land use planning to support its continued extraction.

The Inglewood Oil Field, located in the Westside Planning Area, is a prominent example. It is the largest urban oil field in the nation and has been in continuous operation since 1924. Discoveries like this in the 1920s spurred an economic boom, making Los Angeles a leading oil exporter and fostering the growth of the automotive and other key industries. Oil fields extend across broad areas of the southern and central Los Angeles Basin, from unincorporated Rowland Heights in the east to the Westside. According to the California Geologic Energy Management Division (CalGEM), there were 2,410 active oil and gas wells in Los Angeles County in 2021, with a total production of approximately 10.2 million barrels of oil and 5.3 billion cubic feet of natural gas.

5.12.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the Project would:
M-1: 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.

M-2: 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.

5.12.3 Environmental Impacts

5.12.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR recognized that phasing out fossil fuel infrastructure inherently conflicts with maximizing the extraction of regional mineral resources. While the CAP PEIR did not identify a direct significant impact to mineral resources at the programmatic plan level, it acknowledged that the fundamental shift away from fossil fuels represents a permanent change in resource management. This analysis builds upon the CAP PEIR's findings, evaluating the direct, localized loss of availability of these resources resulting from the specific regulatory mechanisms of the ROWO. Because the Project's fundamental purpose is to permanently prohibit extraction, no programmatic mitigation measures from the CAP PEIR can feasibly reduce this impact without conflicting with the Project's core objectives. Therefore, this analysis focuses on evaluating the extent of this unavoidable loss of resource availability.

The evaluation of impacts to mineral resources is based on a review of the Project's direct effects on the availability of known mineral resources as identified in official state and local plans. This analysis uses established CEQA principles to determine if the Project would cause the loss of availability of a mineral resource of local or statewide value.

This assessment is based on a qualitative, policy-based review of existing conditions and the Project's regulatory actions at a countywide scale. It considers:

- The identification and location of known mineral resources, specifically oil and natural gas, as documented by state and local agencies.
- The official designation of these resources as being of value to the region, as established in the General Plan.
- The Project’s action to prohibit new extraction and phase out existing operations at sites designated for mineral resource recovery.
- The relationship between the Project's purpose and the feasibility of mitigation for the identified impact.

Key sources of information include:

- The Project Description (Chapter 3) and Appendix A (Existing Conditions Site Inventory).
- The Environmental Setting (Chapter 4), particularly Section 4.4, Mineral Resources.
- County General Plan, including the Conservation and Natural Resources Element and the official Land Use Policy Map.
- California Geologic Energy Management Division (CalGEM) databases with well locations.
- Prior CEQA documents for oil and gas projects within the County, including the Baldwin Hills Community Standards District EIR.

This methodology is consistent with CEQA Guidelines Appendix G and is used to determine whether the Revised Oil Well Ordinance would result in the loss of availability of a known and valued mineral resource.

5.12.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22), the Baldwin Hills Community Standards District (CSD), the Newhall Ranch Specific Plan, and the County General Plan to prohibit new oil wells and production facilities and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period, except within the Coastal Zone. By the end of the amortization period, oil wells and production facilities must cease operations and be decommissioned in accordance with all applicable regulations.

Key mineral resource-related project characteristics include:

- Prohibition of New Mineral Resource Extraction: No new oil wells or production facilities may be established in any zone. This action permanently prevents the future exploration and recovery of oil and natural gas resources in all unincorporated areas of Los Angeles County, except the Coastal Zone.
- Phase-Out of Existing Mineral Resource Recovery Sites: Existing, legally established oil wells will be deemed nonconforming uses and subject to removal after a 20-year amortization period. This is the primary regulatory mechanism that ensures the cessation of all current mineral recovery operations, leading to the loss of availability of the remaining resources at all active and idle well sites, except in the Coastal Zone.
- Permanent Cessation of Extraction Activities: The ordinance creates a non-discretionary mandate (PDF-LU-1 and PDF-LU-2) for the complete plugging and abandonment of all wells and the restoration of the sites, except in the Coastal Zone. This ensures that the mineral resource is permanently rendered inaccessible for future recovery at these locations, and the restoration of the land for other uses further precludes its function as a mineral recovery site.
- Removal of Land Use Protections for Mineral Resources: The Project includes a comprehensive General Plan Amendment to remove the "Mineral Resources" land use designation from oil fields and to delete policies that previously supported oil extraction. This is a direct regulatory action that removes the local planning protections for these specific mineral resources, facilitating their loss of availability.
- Countywide Application to All Known Oil and Gas Deposits: The Revised Oil Well Ordinance applies to all oil wells in the unincorporated areas, affecting the 248 parcels identified in Appendix A. This action impacts all known oil fields under the County's jurisdiction, from the large Inglewood Oil Field to smaller deposits in other planning areas, ensuring a comprehensive loss of availability of these locally and regionally significant resources.

Overall, implementation of the Revised Oil Well Ordinance is anticipated, by its intended design, to result in the permanent loss of availability of known oil and natural gas resources of value to the region and the state. This effect is an unavoidable consequence of achieving the Project's stated public health, environmental, and land use compatibility objectives.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for mineral resources, considering the direct and permanent changes to resource availability.

5.12.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance, well abandonment, and restoration, which apply throughout the decommissioning process. From a mineral resources standpoint, the Project is expected to result in one primary and direct type of effect:

- The permanent loss of availability of known oil and natural gas resources. This occurs by prohibiting any future drilling and mandating the permanent plugging and abandonment of all existing wells. This effect is a direct and unavoidable consequence of implementing the ordinance to achieve the County's public health, environmental, and land use compatibility objectives.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds for mineral resources identified in Section 5.12.2. The analysis uses a qualitative, policy-based approach to determine whether the Project's direct and permanent removal of access to a valued mineral resource constitutes a significant environmental impact under CEQA.

Impact 5.12-1: Would the proposed Project 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? [Threshold M-1]

Significant and Unavoidable Impact.

The CEQA threshold is met if a project would result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. Crude oil and natural gas are known mineral resources of significant economic value to the region and the state of California, as evidenced by over a century of production and their ongoing role in the state's energy portfolio. The baseline condition is one in which these resources are actively being recovered and are considered available for future extraction under existing regulations.

The Project is a comprehensive regulatory action that will prohibit all new oil and gas production and mandate the phase-out and permanent decommissioning of all existing operations at the parcels identified in Appendix A. The ordinance accomplishes this by designating existing facilities as nonconforming uses and requiring their cessation and removal after a 20-year amortization period.

The Project's core actions will, by their intended design, directly and permanently cause the loss of availability of the remaining oil and gas reserves at all affected sites within the unincorporated Los Angeles County. This is not an incidental or indirect effect; it is an unavoidable consequence of

implementing the ordinance to achieve its stated public health, environmental, and land use compatibility objectives. The requirement to permanently plug and abandon all wells in accordance with CalGEM standards ensures that the resource is rendered inaccessible for any future recovery.

Pursuant to CEQA, an impact is considered unavoidable if no feasible mitigation measures can reduce it to a less than significant level. In this case, mitigation is considered infeasible because any measure that would reduce the impact—such as by allowing for continued, future, or alternative methods of extraction—would directly conflict with the Project's fundamental purpose. As stated in the Project Description, the Project's primary purpose is "to protect public health, safety, and the environment; prevent new risks from oil and gas development; and promote compatible land use." Allowing mineral resource extraction to continue would fundamentally undermine these objectives.

It should be noted that the Project has been purposely designed to minimize the immediacy and economic shock of this loss of resource availability. Rather than imposing an immediate, outright ban on existing extraction, the Project's built-in Project Design Feature (PDF-LU-1: Decommissioning and Site Restoration Mandate) operates in tandem with a 20-year amortization schedule. This phased approach allows for the continued, albeit finite, extraction of oil and gas resources over two decades, providing a gradual and managed transition before the mandatory plugging and abandonment requirements of PDF-LU-1 take full effect. However, while this 20-year timeline substantially reduces the severity of the impact compared to an immediate prohibition, the ultimate end-state of PDF-LU-1 remains the complete cessation of extraction.

Because the Project will directly result in the loss of availability of a known mineral resource of value to the region and the state, and because no feasible mitigation exists that is consistent with the Project's core climate and public health objectives (which implement CAP Measure ES1), the impact is considered significant and unavoidable.

Impact 5.12-2: Would the proposed Project 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? [Threshold M-2]

Significant and Unavoidable Impact.

A significant impact occurs if a project results in the loss of availability of a mineral resource recovery site that has been delineated as locally important in a general plan or other land use plan. The County General Plan is the primary local planning document that delineates such sites. The General Plan's official Land Use Policy Map explicitly assigns a "Mineral Resources" land use designation to major oil fields, including the Inglewood Oil Field. This official mapping constitutes a formal delineation of these areas as locally important mineral resource recovery sites. The General Plan further supports this through policies designed to manage and protect these resources, such as Policy C/NR 10.5 ("Manage mineral resources in a manner that effectively plans for access to, development and conservation of, mineral resources...").

The Project's core actions directly and intentionally alter this local designation and preclude the use of these sites for mineral recovery. The Project:

- Applies directly to the oil fields that are delineated with the "Mineral Resources" land use designation.
- Includes a General Plan Amendment specifically to amend this designation and delete the policies that support oil extraction.
- Prohibits all new drilling and mandates the phase-out and permanent decommissioning of all existing oil and gas operations within these delineated areas.

These actions will directly result in the permanent loss of availability of these specifically delineated, locally important mineral resource recovery sites. This is a direct consequence of the County's policy decision to prioritize public health and environmental protection over the continued use of these sites for mineral extraction.

While the Project ultimately results in the permanent loss of these designated mineral resource recovery sites, the Project's regulatory framework inherently lessens the immediate severity of this impact. Specifically, PDF-LU-1 (Decommissioning and Site Restoration Mandate) relies on a 20-year amortization period before mandatory site closure and restoration are triggered. By structuring PDF-LU-1 to include an extended phase-out rather than an immediate cessation mandate, the Project allows for the continued recovery of these locally important mineral resources for a transitional timeframe, thereby minimizing disruption.

Nonetheless, because the amortization period within PDF-LU-1 culminates in a permanent prohibition, further mitigation for this impact is considered infeasible. Any additional measure that would further reduce the impact—such as allowing for continued extraction beyond the 20-year horizon—would directly conflict with the Project's fundamental purpose and stated objectives "to protect public health, safety, and the environment; prevent new risks from oil and gas development; and promote compatible land use."

Because the Project will directly result in the loss of availability of locally important mineral resource recovery sites as delineated on the County's General Plan, and because no feasible mitigation exists that is consistent with the Project's objectives, the impact is considered significant and unavoidable.

5.12.4 Cumulative Impacts

A significant cumulative impact would occur if the Project's impact on mineral resources, when combined with other past, present, and reasonably foreseeable future projects, results in a considerable regional loss of availability of valuable mineral resources. The geographic scope for this analysis is the Los Angeles Basin, which represents a single, massive oil and gas resource province that spans multiple local jurisdictions.

The cumulative context is defined by a significant regional policy shift away from urban oil and gas extraction, led by the County and other major jurisdictions. The Los Angeles Basin is one of the

most productive petroleum provinces in the world on a per-area basis, having historically produced over 22.9 billion barrels of oil. However, regional production has been in a long-term decline, falling from 117 million barrels in 1993 to approximately 11 million barrels in 2022. This trend of steadily declining production is now being accelerated by deliberate policy actions.

This decline has occurred across the entire basin, which remains a significant petroleum province despite its maturity. Over the same 30-year period, the number of producing wells in the Los Angeles Basin fell by 42 percent, from approximately 8,100 to 4,700, and annual natural gas production dropped by 82 percent. Notwithstanding this decline, the U.S. Energy Information Administration estimated that as of 2022, 224 million barrels of crude oil remained as proved reserves in the basin. These remaining proved reserves, located across multiple jurisdictions, are the resource base that is subject to the cumulative loss of availability from regional phase-out policies.

A primary cumulative project is the City of Los Angeles's effort to phase out oil and gas drilling. The City is currently moving forward to reinstate an ordinance that, like the Project, prohibits new oil and gas extraction and phases out all existing operations citywide. Furthermore, the State of California has enacted Senate Bill 1137 (fully active following the withdrawal of a referendum in 2024), which bans new oil and gas wells within 3,200 feet of sensitive receptors statewide, effectively sterilizing significant urban mineral reserves. When the Project is considered in combination with the City of Los Angeles's parallel project and State legislation like SB 1137, the result is a coordinated and cumulatively considerable loss of availability of the LA Basin's remaining oil and gas reserves. This represents a widespread regional trend among the area's largest land use authorities to transition away from urban oil extraction.

It should be noted that while this regional trend results in the ultimate loss of these resources, the implementation of these policies is structured to minimize the immediate cumulative shock to the regional supply chain. As detailed in the project-level analysis, the Project relies on a 20-year amortization schedule built into PDF-LU-1 to manage its phase-out. Similarly, the City of Los Angeles's parallel ordinance incorporates an extended amortization period for existing operations. By utilizing these phased timelines, the participating jurisdictions are collectively facilitating a gradual, managed decline of the LA Basin's mineral extraction rather than an abrupt, coordinated regional shutdown. This temporal spacing inherently lessens the immediate severity of the cumulative impact.

Nonetheless, because these amortization periods ultimately culminate in a permanent regional prohibition, the final cumulative condition remains the complete cessation of extraction. As determined in the preceding analysis, the Proposed Project would result in a significant and unavoidable impact by causing the loss of availability of known oil and gas resources within the unincorporated areas of Los Angeles County. The Project's incremental effect is, by itself, "cumulatively considerable" because it affects major production areas like the Inglewood Oil Field, one of the most productive in the basin.

When the Project's significant impact is combined with the similar and substantial impact of the City of Los Angeles's ordinance and the broader regional trend of declining production, the result is a significant and unavoidable cumulative impact on the availability of mineral resources in the Los Angeles Basin.

5.12.5 Level of Significance Before Mitigation

Based on the analysis presented in this chapter, the Project would result in significant and unavoidable impacts to mineral resources.

The Project would have a significant and unavoidable impact by causing the loss of availability of known oil and gas resources of value to the region and the state (Threshold MR-1). It would also have a significant and unavoidable impact by causing the loss of availability of locally important mineral resource recovery sites delineated on the County's General Plan (Threshold MR-2). These impacts are a direct result of the Project's intended action to prohibit and phase out all oil and gas extraction, and no feasible mitigation exists that would be consistent with the Project's objectives. While the Project's built-in 20-year amortization schedule (PDF-LU-1) minimizes the immediate severity of this loss by providing a gradual, managed transition, the ultimate end-state is a permanent prohibition, ensuring the final impact remains significant and unavoidable.

Furthermore, the Project's contribution to the regional loss of mineral resource availability, when considered with similar actions by other jurisdictions like the City of Los Angeles, is cumulatively considerable. Therefore, the Project would also result in a significant and unavoidable cumulative impact on mineral resources.

5.12.6 Mitigation Measures

As determined in the impact analysis, the Project would result in significant and unavoidable impacts to mineral resources by causing the ultimate loss of availability of known oil and gas resources. While the Project has been structured to inherently minimize the immediate severity of this loss through its built-in 20-year amortization schedule (PDF-LU-1), no feasible CEQA mitigation measures have been identified that would reduce these impacts to a less-than-significant level. Because PDF-LU-1 is an integral, legally binding mechanism of the Project itself, it is not acting as CEQA mitigation.

Further mitigation beyond the established phase-out period is considered infeasible. Any measure that could additionally lessen the impact—such as allowing for extraction in perpetuity or extending operations beyond the 20-year horizon—would fundamentally conflict with the Project's stated objectives to protect public health, safety, and the environment by prohibiting and phasing out oil and gas operations. Because no mitigation is feasible without undermining the core purpose of the Project, the impacts are considered significant and unavoidable.

Pursuant to CEQA Guidelines Section 15093, when a lead agency approves a project that will have significant and unavoidable impacts, it must adopt a Statement of Overriding Considerations setting forth the specific reasons why the project's benefits outweigh its unavoidable adverse environmental effects.

5.12.7 Level of Significance After Mitigation

As established in Section 5.12.6, while the Project's design (PDF-LU-1) provides a transitional phase-out to avoid an immediate cessation of recovery, no feasible mitigation measures were identified that could reduce the Project's ultimate, permanent impacts on mineral resources to a less-than-significant level. Therefore, the Project's impacts related to the loss of availability of a known mineral resource of value (Threshold MR-1) and the loss of a locally important mineral resource recovery site (Threshold MR-2) remain significant and unavoidable.

The Project's contribution to the cumulative loss of mineral resources in the Los Angeles Basin also remains significant and unavoidable.

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CHAPTER 5.13 NOISE

This section analyzes the potential for the Revised Oil Well Ordinance (Project) to result in significant noise and vibration impacts within unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would result in a substantial temporary or permanent increase in ambient noise levels, generate excessive groundborne vibration, or expose people to excessive noise from airport operations. It includes a discussion of the fundamentals of sound and examines the applicable federal, state, and local noise regulations.

The analysis evaluates both short-term and long-term noise impacts. Short-term impacts are related to the temporary noise and vibration generated during the decommissioning and removal of oil production infrastructure, which involves the use of heavy equipment.

Long-term impacts are related to the permanent elimination of operational noise sources from existing oil and gas facilities—including pumps, compressors, and intermittent drilling or workover activities—and the Project's direct amendment to the County's Noise Ordinance to remove the current exemption for oil and gas wells.

This chapter is organized to present the environmental and regulatory setting relevant to noise, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods used to assess potential impacts, and the results of the impact analysis. Mitigation measures, where applicable, are also identified.

This analysis draws upon site-specific and regional context information contained in the Initial Study, the County's General Plan (including the Noise Element), the County Noise Ordinance (Title 12), and relevant Community Standards Districts (CSDs), as well as CEQA Appendix G thresholds.

During the scoping period for this EIR, the County received comments regarding noise from several organizations and agencies. As summarized in Table 2-1: Summary of Scoping Comments Received, commenters raised concerns about noise associated with the demolition and decommissioning activities required to phase out the oil wells, as well as construction and operational noise from the foreseeable future redevelopment of the sites. This chapter takes these comments into account and evaluates the potential for the project to generate a substantial temporary or permanent increase in ambient noise levels.

5.13.1 Environmental Setting

5.13.1.1 Fundamentals of Environmental Noise

Sound is a pressure wave transmitted through a medium such as air and is described in terms of its loudness or amplitude (measured in decibels), its frequency or pitch (measured in Hertz), and its duration. Noise is most often defined as sound that is loud, unpleasant, unexpected, or otherwise undesirable. While sound can be measured objectively, the perception of noise and the physical response to it are subjective, which complicates the analysis of its impact on people.

Characteristics of Sound and Human Perception

The standard unit for measuring the loudness of sound is the decibel (dB). Because the decibel scale is logarithmic, a sound 10 dB louder than another is 10 times the acoustic energy, but is perceived by the human ear as being roughly twice as loud. In a typical outdoor environment, a 3 dB change in noise is considered a just-noticeable difference, while a 5 dB change is readily noticeable. A 10 dB increase is perceived as a doubling of loudness.

TABLE 5.13-A: Noise Level of Common Sounds

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	— 110 —	Rock band
Jet fly-over at 1000 feet		
	— 100 —	
Gas lawn mower at 3 feet		
	— 90 —	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	— 80 —	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	— 70 —	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	— 60 —	
		Large business office
Quiet urban daytime	— 50 —	Dishwasher next room
Quiet urban nighttime	— 40 —	Theater, large conference room (background)
Quiet suburban nighttime		
	— 30 —	Library
Quiet rural nighttime		Bedroom at night, concert hall (background)
	— 20 —	
		Broadcast/recording studio
	— 10 —	
Lowest threshold of human hearing	— 0 —	Lowest threshold of human hearing

Source: Caltrans 2013.

The human ear is not equally sensitive to all frequencies. To account for this, the A-weighted decibel scale (dBA) is used. This scale filters sound frequencies to better approximate the sensitivity of the human ear, making it the standard for measuring environmental noise. Noise is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known effects, federal, state, and local governments have established criteria to protect public health and safety.

Noise Terminology and Metrics

The following terminology and metrics are used to describe environmental noise in this analysis:

- Decibel (dB): A unit for describing the amplitude of sound, equal to 10 times the logarithm (to the base 10) of the ratio of the power of the sound to a reference power.
- A-Weighted Decibel (dBA): The decibel scale adjusted to account for the frequency response of the human ear.
- Equivalent Continuous Noise Level (Leq): The average A-weighted noise level during a measurement period. It is the single decibel value that represents the same acoustic energy as the fluctuating noise levels over the entire period.
- Statistical Sound Level (Ln): The sound level that is exceeded "n" percent of the time during a measurement period. The L90 is the level exceeded 90 percent of the time and is often considered the background noise level. The L10 is the level exceeded 10 percent of the time and is often used to represent intrusive noise events.
- Day-Night Sound Level (Ldn or DNL): A 24-hour average of the A-weighted sound levels, with a 10 dBA "penalty" applied to noise occurring during the noise-sensitive nighttime hours (10:00 p.m. to 7:00 a.m.).
- Community Noise Equivalent Level (CNEL): The primary metric used by the State of California for land use compatibility planning. It is a 24-hour average like Ldn but with an additional 5 dBA penalty applied to noise occurring during the evening hours (7:00 p.m. to 10:00 p.m.).

5.13.1.2 Regulatory Setting

Federal Regulations

While the primary authority for regulating environmental noise has been delegated to state and local governments, several federal agencies and statutes establish a framework for noise control, particularly for aircraft noise and worker safety.

Noise Control Act of 1972

This act established a national policy to promote an environment free from noise that jeopardizes public health and welfare. It authorized the U.S. Environmental Protection Agency (EPA) to set noise emission standards for commercial products like transportation vehicles and construction equipment. However, the subsequent defunding of the EPA's Office of Noise Abatement and Control in 1981 effectively shifted the primary responsibility for regulating local environmental noise to state and local governments.

Federal Aviation Administration (FAA)

The FAA regulates aircraft noise and guides land use compatibility planning near airports. Federal Aviation Regulation (FAR) Part 150, Airport Noise Compatibility Planning, is the primary federal regulation for this purpose. It establishes the procedures and methodologies for airport operators to prepare Airport Noise Exposure Maps and Noise Compatibility Programs.

- Land Use Compatibility: While subject to local conditions, the FAA generally identifies an annual average noise level of 65 dBA CNEL as the threshold of significance for noise-sensitive land uses, including residences. Areas exposed to noise levels at or above 65 dBA CNEL are generally considered incompatible with residential use.
- Significance Threshold for Noise Increases: The FAA has determined that a significant impact occurs if a proposed action would cause a noise increase of 1.5 dBA CNEL or more on any noise-sensitive area that is already located within the 65 dBA CNEL noise contour.

Federal Transit Administration (FTA)

The FTA's Transit Noise and Vibration Impact Assessment manual provides guidance, but not an enforceable regulation, for construction noise. It recommends a daytime construction noise level threshold of 80 dBA Leq at residences. As the County has its own specific and enforceable noise limits in its Noise Ordinance, the FTA guidance is considered informative but is not the standard used for this analysis.

Occupational Safety and Health Administration (OSHA)

OSHA regulations (29 CFR § 1910.95) are designed to protect workers from occupational noise exposure to prevent hearing loss. These standards apply to the workers who will perform the temporary decommissioning activities required by the Project but are worker safety standards, not environmental standards for the general public.

Summary of Federal Noise Considerations

While federal laws establish a national policy framework, worker safety standards, and specific regulations for aircraft noise (FAA Part 150), the primary authority for controlling local environmental noise has been delegated to state and local agencies. Therefore, the County's own Noise Ordinance (Title 12) is the most direct and enforceable regulation for the Project's potential noise impacts from decommissioning and oil field operations.

State Regulations

The State of California delegates the primary responsibility for noise control to local governments through the General Plan process. State law mandates this planning and provides technical guidelines and building codes to ensure a consistent approach to protecting public health and welfare from excessive noise.

California General Plan Law (Government Code Section 65302(f))

State law requires that every city and county prepare and adopt a Noise Element as part of its comprehensive General Plan. The Noise Element serves as the community's primary policy document for noise control and land use planning. It must identify and appraise existing noise problems and project future noise levels from sources including, but not limited to:

- Highways and freeways;
- Primary arterials and major local streets;
- Passenger and freight railroad operations;

- Aviation and airport-related operations; and
- Local industrial plants and other stationary sources.

State Office of Land Use and Climate Innovation (LCI) General Plan Guidelines

The Governor's Office of Land Use and Climate Innovation (LCI) provides guidance for determining the compatibility of various land uses with different levels of environmental noise. While advisory, these guidelines are the statewide standard of practice and form the basis for the noise policies in most local General Plans, including Los Angeles County's. The guidelines use the Community Noise Equivalent Level (CNEL) metric to define noise compatibility ranges for sensitive land uses.

TABLE 5.13-B: Land Use Compatibility for Community Noise Environments

	Community Noise Exposure (CNEL)			
	Normally Acceptable[1]	Conditionally Acceptable[2]	Normally Unacceptable[3]	Clearly Unacceptable[4]
Residential-low density, single-family, duplex, mobile homes	50–60	55–70	70–75	75–85
Residential – multiple-family	50–65	60–70	70–75	70–85
Transit lodging – motel, hotels	50–65	60–70	70–80	80–85
Schools, libraries, churches, hospitals, nursing homes	50–70	60–70	70–80	80–85
Auditoriums, concert halls, amphitheatres	NA	50–70	NA	65–85
Sports arenas, outdoor spectator sports	NA	50–75	NA	70–85
Playgrounds, neighborhood parks	50–70	NA	67.5–77.5	72.5–85
Golf courses, riding stables, water recreation, cemeteries	50–70	NA	70–80	80–85
Office buildings, business commercial and professional	50–70	67.5–77.5	75–85	NA
Industrial, manufacturing, utilities, agriculture	50–75	70–80	75–85	NA

Source: OPR 2017.
Notes: CNEL = community noise equivalent level; NA = not applicable

1. Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
2. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features have been included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning, will normally suffice.
3. Normally Unacceptable: New construction or development should be discouraged. If new construction of development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise-insulation features must be included in the design.
4. Clearly Unacceptable: New construction or development should generally not be undertaken.

California Building Code (Title 24)

The 2022 California Building Code (CBC), Part 2 of Title 24 of the California Code of Regulations, sets standards for interior noise levels in new multi-family residential construction (e.g., apartments, condominiums, hotels). Section 1206.5 of the CBC stipulates that interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room. This standard requires that building shells be designed with adequate noise insulation to ensure residents are protected from excessive exterior noise.

Summary of State Noise Considerations

California's regulatory framework establishes a system where the state mandates that local governments plan for and control noise through their general plan noise elements. The state provides the technical guidelines for land use compatibility (OPR Guidelines) and sets building code standards for interior protection (Title 24). This framework establishes the legal and technical basis for the County's General Plan Noise Element and Noise Ordinance (Title 12), which are the specific, enforceable standards used to evaluate the Project's noise impacts in this EIR.

Local Regulations

Los Angeles County regulates noise through a framework led by the foundational policies of the General Plan Noise Element, which are implemented by specific, enforceable standards in the County Code, primarily the Noise Ordinance (Title 12).

County of Los Angeles General Plan

The Noise Element of the General Plan establishes the County's goals, policies, and noise compatibility standards to protect residents from excessive noise exposure. The County uses its own Community Noise Criteria, shown in the table below, to determine acceptable exterior noise levels for various land use zones. By controlling the noise generated from individual properties, all uses are afforded protection against excessive noise.

TABLE 5.13-C: Los Angeles County Community Noise Criteria

Noise Zone	Land Use of Receptor Property	Time	Std 1 L_{50} (30 min/hr)	Std 2 L_{25} (15 min/hr)	Std 3 $L_{8.3}$ (5 min/hr)	Std 4 $L_{1.7}$ (1 min/hr)	Std 5 L_0 (at no time)
I	Noise Sensitive[a]	Anytime	45	50	55	60	65
II	Residential[b]	10:00 p.m.–7:00 a.m.	45	50	55	60	65
		7:00 a.m.–10:00 p.m.	50	55	60	65	70
III	Commercial	10:00 p.m.–7:00 a.m.	55	60	65	70	75
		7:00 a.m.–10:00 p.m.	60	65	70	75	80
IV	Industrial	Anytime	70	75	80	85	90

Source: County of Los Angeles 1978.

Notes: Std = Standard; min = minutes; hr = hour

a. Noise sensitive zones are designated by the County Health Officer and are required to be clearly identified with posted signs, such as hospital facilities.
b. Residential includes single family and multiple family dwellings but excludes transient lodging.

Applicable policies from the General Plan include:

- Policy N 1.2: Protect noise-sensitive uses from excessive noise and vibration levels.
- Policy N 1.5: Minimize stationary source noise impacts on sensitive uses through site planning, buffering, and other mitigation measures.
- Policy N 3.1: Enforce the County Noise Ordinance to reduce intrusive noise.

Los Angeles County Code

The County Code contains the specific, enforceable regulations that implement the policies of the Noise Element.

- Title 12 – Environmental Protection (The Noise Ordinance): Chapter 12.08 is the County's primary noise regulation.
    - Stationary Noise Limits (Section 12.08.390): This section establishes the maximum exterior noise levels for each noise zone, as detailed in the table above.
    - Construction Noise (Section 12.08.440): This section prohibits noise-disturbing construction activity between 7:00 p.m. and 7:00 a.m. on weekdays and Saturdays, and all day on Sundays and holidays. For projects lasting more than 10 days, noise at affected residential properties is limited to 60 dBA during the day and 50 dBA at night.
    - Vibration (Section 12.08.560): This section prohibits the operation of any device that creates a vibration above the perception threshold (a motion velocity of 0.01 inches per second) at or beyond the property boundary.
    - Oil Well Exemption and Project Amendment: Crucially, the existing Noise Ordinance currently exempts oil and gas drilling and reworking activities from its noise limits. A foundational component of the Project is a direct amendment to this ordinance to eliminate that exemption. This action will make all remaining oil and gas operations and all future decommissioning activities fully subject to the County's standard noise regulations for the first time.
- Title 22 – Planning and Zoning (Green Zones Program): Chapter 22.84, the Green Zones Ordinance, provides additional noise-related protections in historically impacted communities. It requires a Conditional Use Permit (CUP) for new industrial uses within 500 feet of a sensitive use and may require a professional noise evaluation and control plan.
- Title 26 – Building Code: The County adopts the California Building Code, which requires that new multi-family residential buildings in noise-critical areas be designed to prevent the intrusion of exterior noise beyond an interior level of 45 dBA CNEL.

Community Standards Districts (CSDs)

In certain areas, CSDs provide an additional layer of zoning with stricter, community-specific regulations. Specifically, Baldwin Hills CSD was established for the Inglewood Oil Field and requires a comprehensive noise monitoring program with specific shutdown thresholds and imposes a stricter nighttime noise limit than the countywide ordinance.

5.13.1.3 Existing Environmental Conditions

The existing noise environment in the unincorporated areas of Los Angeles County is diverse and complex. It ranges from the quiet, low ambient noise levels of rural and open space areas in the Santa Monica Mountains or Antelope Valley to the high, persistent noise levels of dense urban communities dominated by transportation and industrial sources.

Major Existing Noise Sources

The ambient noise environment is a composite of noise from all sources, near and far. The major noise sources in the unincorporated areas are described below.

- Transportation Sources: The dominant and most pervasive source of noise throughout most of the developed portions of the County is transportation. This includes a constant stream of vehicle traffic on major regional freeways such as the I-5, I-10, I-110, I-405, and SR-60, high-volume arterial roadways, and local streets. Freight and passenger rail operations and aircraft overflights associated with Los Angeles International Airport (LAX) and other regional airports also contribute significantly to the baseline ambient noise.
- Stationary Oil and Gas Sources: The existing oil and gas facilities that are the subject of this Project are a key source of stationary, industrial noise. These facilities contain numerous noise sources that often operate 24 hours a day. This includes the persistent, cyclical, low-frequency sound of pumpjacks and the constant mechanical drone of compressors, engines, and other processing equipment, which can be a defining feature of the noise environment in adjacent communities.
- Intermittent Oil and Gas Sources: Certain oil field activities are significant, albeit temporary, sources of loud and intrusive noise. The most prominent of these is well drilling, which involves the 24-hour operation of heavy diesel engines, generators, and mechanical equipment for a period of several days or weeks per well. Similarly, well servicing or "workover" operations generate high-volume, short-term noise. These activities can temporarily but substantially increase ambient noise levels for nearby residents.

In addition to major transportation and oil field operations, the ambient noise environment includes a variety of other common community and intermittent sources. General construction activity from public works projects and private development is a frequent source of temporary, high-volume noise from equipment such as bulldozers, backhoes, and jackhammers. Area sources, including landscaping equipment like leaf blowers and lawnmowers, waste collection vehicles, and the operation of heating and air conditioning units on commercial buildings, also contribute to the baseline noise environment. Finally, recreational activities at parks, sports fields, and schools can generate intermittent noise. These sources combine to create the existing ambient noise level into which any temporary noise from the Project's decommissioning activities would be introduced.

Sound Propagation in the Local Environment

The way in which noise travels and decreases over distance depends on several factors present in the local environment:

- Geometric Spreading: Noise from a localized source (a point source, like a single pumpjack) attenuates at a rate of 6 dBA for each doubling of distance. Noise from a linear source (like freeway traffic) attenuates more slowly, at a rate of 3 dBA for each doubling of distance.

- Ground Absorption: The surface between a source and a receiver affects noise levels. Acoustically "hard" sites, like paved areas or bodies of water, are highly reflective and do little to reduce noise. Acoustically "soft" sites with absorptive surfaces, like open fields with soft dirt or dense vegetation, can provide additional noise reduction.
- Shielding by Barriers: Natural terrain (such as hills) and man-made features (such as buildings and walls) can substantially reduce noise. A barrier that breaks the line-of-sight between a source and a receiver will typically result in at least 5 dBA of noise reduction, with taller barriers providing greater attenuation. Sound walls are a common feature at some existing oil field sites for this reason.

Groundborne Vibration

Vibration is the oscillatory movement of a solid body, typically felt rather than heard. Common sources of perceptible groundborne vibration in the County include heavy rail transit and construction activities. While ongoing oil and gas production is not a major source of continuous vibration, the heavy equipment used for temporary drilling, workover operations, and future decommissioning activities (e.g., large bulldozers, jackhammers) can be a source of perceptible groundborne vibration.

Sensitive Receptors

Noise-sensitive land uses (receptors) are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, libraries, and passive recreation areas are typically considered sensitive receptors.

A primary and defining characteristic of the Project area's baseline environmental setting is the close proximity of industrial oil and gas noise sources to these sensitive receptors. As detailed in the Land Use and Planning section of this EIR, numerous oil facilities are located directly adjacent to residential neighborhoods, schools, and parks in communities such as West Carson, View Park-Windsor Hills, and Rowland Heights. The noise generated by these industrial operations is a key and often intrusive component of the existing ambient noise environment for these communities.

5.13.2 Thresholds of Significance

In accordance with the County's Environmental Checklist Form (Initial Study) and Appendix G of the State CEQA Guidelines, the applicable thresholds of significance regarding noise and vibration are listed below. A project may have a significant impact if it would:

NOI-1: Result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies.

NOI-2: Result in generation of excessive groundborne vibration or groundborne noise levels.

NOI-3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or

public use airport, would the project expose people residing or working in the project area to excessive noise levels.

5.13.3 Environmental Impacts

This section evaluates the potential for the Project to result in significant noise and vibration impacts, based on the thresholds of significance identified in Section 5.13.2. The analysis considers both the temporary, short-term effects associated with the decommissioning and restoration of existing well sites, and the permanent, long-term effects resulting from the cessation of all oil and gas production activities. While decommissioning will temporarily generate construction-type noise and vibration, the long-term effect of the Project will be the permanent elimination of industrial noise sources from the unincorporated areas, which is a beneficial outcome.

5.13.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the long-term phase-out of fossil fuels would be generally beneficial to the ambient noise environment but acknowledged that the physical decommissioning of infrastructure would involve earth-moving and heavy equipment that could generate temporary, short-term noise and vibration impacts. The CAP PEIR determined that these impacts are fully mitigated to a less-than-significant level through mandatory regulatory compliance with local noise ordinances (CAP PEIR, Chapter 3.13). Therefore, this programmatic analysis strictly evaluates the incremental short-term noise impacts of ROWO's decommissioning activities consistent with the CAP PEIR's findings. Because any temporary decommissioning activities are strictly governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with the County's Noise Ordinance, this analysis focuses on demonstrating how these existing frameworks ensure noise and vibration impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

As described in the Project Description, ROWO is a policy-level Project that does not propose or authorize any site-specific new development. The analysis in this EIR is therefore programmatic and assesses the impacts associated with the reasonably foreseeable physical changes that could occur from the Project's implementation, namely the temporary decommissioning and restoration of existing well sites. This analysis does not speculate on the noise or vibration impacts of any potential future development on these restored sites, as any such proposals would require a separate, project-level CEQA review.

The evaluation of potential noise and vibration impacts is based on a qualitative comparison of the Project's effects against the specific, quantitative standards established in the General Plan Noise Element and the County Noise Ordinance (Title 12, Chapter 12.08).

- Short-Term (Decommissioning) Noise: Potential short-term noise impacts are evaluated by comparing the typical noise levels generated by heavy equipment used for decommissioning (e.g., workover rigs, excavators, haul trucks) against the specific, enforceable standards in the County's

Noise Ordinance. This includes the ordinance's restrictions on the hours of construction activity and its maximum allowable dBA levels at nearby sensitive receptors.

- Short-Term (Decommissioning) Vibration: Potential vibration impacts are evaluated qualitatively by comparing the potential groundborne vibration from decommissioning equipment against the County's strict vibration perception threshold (a motion velocity of 0.01 inches per second) as defined in the Noise Ordinance.
- Long-Term (Operational) Noise: The long-term noise impact is evaluated by describing the permanent elimination of existing stationary and intermittent noise sources from oil and gas operations.

This methodology also considers the effect of the Project's built-in regulatory controls, including the amendment to the Noise Ordinance to remove the oil and gas exemption and the implementation of Project Design Feature PDF-NOI-1 (Title 12 Noise Ordinance Amendment), which legally subjects all decommissioning work to the County's strict noise limits.

5.13.3.2 Proposed Project Characteristics

The Project is a comprehensive regulatory action that will fundamentally alter the noise environment in the unincorporated areas by phasing out an industrial noise source. The Project characteristics most relevant to the noise and vibration analysis are described below.

- Prohibition of New Noise Sources: The ordinance prohibits the establishment of any new oil wells or production facilities. This action permanently prevents the introduction of new stationary noise sources (e.g., pumps, compressors) and loud, intermittent noise sources (e.g., drilling rigs) into the community.
- Elimination of Existing Noise Sources: The Project requires the phase-out and decommissioning of all existing oil wells over a 20-year amortization period. This will result in the permanent elimination of all existing operational noise from these industrial facilities.
- Amendment to the County Noise Ordinance: A key component of the Project is a direct amendment to the County's Environmental Protection Code (Title 12) that eliminates the current exemption for oil and gas wells from the Noise Control Ordinance. This foundational regulatory change will make all remaining oil and gas operations and all future decommissioning activities fully subject to the County's standard, enforceable noise limits for the first time.
- Temporary Noise-Generating Activities: The only source of potential adverse noise and vibration impacts from the Project is the temporary decommissioning and restoration of well sites. These activities will involve the use of heavy equipment such as workover rigs, excavators, cranes, and haul trucks.
- PDF-NOI-1 (Title 12 Noise Ordinance Amendment): The Project amends the County's Environmental Protection Code by eliminating the current exemption for oil and gas wells from the Noise Control Ordinance. This change will subject all oil and gas operations and decommissioning activities to the County's noise regulations, providing a new mechanism to manage noise impacts on surrounding communities.

5.13.3.3 Impact Analysis

This section evaluates whether implementation of the Revised Oil Well Ordinance would result in significant noise and vibration impacts, based on the thresholds of significance identified in Section 5.13.2. The analysis considers both the temporary, short-term impacts associated with decommissioning and site restoration activities, and the long-term changes resulting from the phase-out of oil production facilities. The evaluation is based on a qualitative comparison of potential noise and vibration levels against the enforceable, quantitative standards in the County Noise Ordinance (Title 12) and considers the effect of the Project's built-in controls, including Project Design Feature PDF-NOI-1.

Impact 5.13-1: Would the proposed Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies? [Threshold NOI-1]

Less Than Significant Impact.

The Project would not result in a substantial temporary or permanent increase in ambient noise levels that would exceed the County's established standards. The Project will have a long-term beneficial impact by permanently eliminating existing industrial noise sources. Any temporary noise increases during the decommissioning phase would be short-term, localized, and required to comply with the County's strict, enforceable noise standards.

Temporary Noise Impacts (Decommissioning)

The Project's reasonably foreseeable physical activities involve the decommissioning and restoration of existing well sites. These activities will temporarily generate noise from the use of heavy equipment, such as workover rigs for well plugging, excavators, cranes, and haul trucks. This will result in a temporary increase in ambient noise levels in the immediate vicinity of the work sites.

However, this temporary impact is considered less than significant for the following reasons:

- Compliance with County Noise Ordinance is Mandatory (PDF-NOI-1): All decommissioning activities will be legally required to comply with the construction noise standards set forth in the Los Angeles County Noise Ordinance (Title 12, Chapter 12.08). This ordinance prohibits noise-disturbing construction between 7:00 p.m. and 7:00 a.m. and on Sundays and holidays. It also sets a quantitative daytime noise limit of 60 dBA at affected residential properties for any work lasting longer than 10 days. Adherence to these enforceable standards ensures that temporary noise will not exceed the County's own threshold for significance.
- Localized and Phased Nature: The decommissioning activities will be temporary and localized to each of the individual project sites. These activities may be spread over a 20-year period, preventing the concentration of noise in any single community at one time.

Permanent Noise Impacts (Operation)

The Project would not cause a permanent increase in ambient noise levels. The long-term, permanent "operational" effect of the Project is the cessation of all oil and gas production, which will result in a permanent and beneficial reduction in ambient noise.

The Project will permanently eliminate the existing industrial noise sources associated with oil and gas sites, including:

- The constant, 24-hour noise from stationary equipment like pumps, compressors, and engines.
- The loud, intrusive, intermittent noise from drilling, well servicing, and workover operations.

Furthermore, a key component of the Project is the amendment to the County Noise Ordinance to remove the existing exemption for oil and gas operations. This is a permanent regulatory benefit that will make any remaining oil field activities during the phase-out period fully subject to the County's enforceable noise limits, providing a new mechanism to protect surrounding communities.

Consistent with the programmatic findings of the CAP PEIR, because the Project's temporary noise impacts are controlled by mandatory compliance with the County Noise Ordinance and built-in Project Design Features (PDF-NOI-1), and its permanent impact is a beneficial reduction in noise, the Project would not result in a substantial increase in ambient noise levels in excess of established standards. Therefore, the impact is less than significant.

Impact 5.13-2: Would the proposed Project result in generation of excessive groundborne vibration or groundborne noise levels? [Threshold NOI-2]

Less Than Significant Impact.

The Project would not result in the generation of excessive groundborne vibration or groundborne noise levels. Any potential for vibration would be temporary, short-term, and required to comply with the County's strict, enforceable standards.

Temporary Vibration Impacts (Decommissioning)

The only potential for the Project to generate groundborne vibration would be during the temporary decommissioning and site restoration activities. The use of heavy-duty equipment, such as large trucks, bulldozers, or jackhammers for removing concrete foundations, could generate perceptible vibration in the immediate vicinity of the work area.

However, this temporary impact is considered less than significant because all decommissioning activities will be legally required to comply with the County Noise Ordinance (Title 12, Chapter 12.08). Section 12.08.560 of the ordinance prohibits operating any device that creates a vibration above the perception threshold at or beyond the property boundary of the source. The ordinance defines this threshold as a motion velocity of 0.01 inches per second (in/sec) peak particle velocity, which is a very conservative standard. Vibration from typical heavy equipment attenuates rapidly with distance and is generally not expected to exceed this threshold at the nearest property line. Furthermore, any such activities would be temporary, localized to each individual site, and phased over a 20-year period, minimizing the duration of potential exposure for any sensitive receptor.

Permanent Vibration Impacts (Operation)

The Project's long-term "operational" effect is the permanent cessation of all oil and gas production activities. Ongoing oil operations are not typically a source of significant or excessive groundborne vibration. Therefore, the permanent elimination of these industrial activities, including the potential for future intermittent high-vibration activities like drilling or workover operations, would have no adverse impact.

Consistent with the findings of the CAP PEIR, because all temporary activities must comply with the County's strict and enforceable vibration ordinance (Section 12.08.560), and the long-term effect is the elimination of industrial activities, the Project would not generate excessive groundborne vibration. The impact is less than significant.

Impact 5.13-3:	**Within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed Project expose people residing or working in the project area to excessive noise levels? [Threshold NOI-3]**

No Impact.

This CEQA threshold is a land use compatibility standard. Its purpose is to prevent the creation of new, permanent situations where noise-sensitive uses are placed in areas exposed to excessive aircraft noise, which is typically defined as the 65 dBA CNEL contour. Sensitive receptors in this context are permanent residents and workers in uses like homes, schools, hospitals, and offices.

The Project is a regulatory action that prohibits and phases out an existing industrial land use. It does not involve the construction or entitlement of any new residential, commercial, or other sensitive land uses that would be occupied by a permanent population. The only human presence associated with the Project's physical activities is the temporary workforce required for decommissioning.

For the purposes of this environmental noise analysis, temporary construction or decommissioning workers are not considered sensitive receptors. Their exposure is short-term and transient, and their protection from workplace noise is a matter of occupational health and safety. This is regulated by the Occupational Safety and Health Administration (OSHA), which sets specific standards for hearing protection in high-noise work environments, and is outside the scope of CEQA's land use compatibility standards.

Because the Project does not introduce any new permanent sensitive receptors who would be exposed to airport noise, and because the temporary workforce is not subject to this environmental threshold, the Project has no mechanism to cause this impact. Therefore, no impact would occur.

5.13.4 Cumulative Impacts

A cumulative noise impact occurs when noise from the Project, when combined with noise from other past, present, and reasonably foreseeable future projects, results in a substantial increase in ambient noise levels. The geographic scope for noise impacts is localized, as noise attenuates over

distance. Therefore, the cumulative analysis considers projects in the immediate vicinity of the individual oil and gas sites where decommissioning would occur.

The cumulative context for the unincorporated areas of Los Angeles County includes ongoing and future development, such as residential, commercial, and infrastructure projects. These projects will generate temporary construction noise. However, all cumulative projects are subject to the same mandatory requirements of the Los Angeles County Noise Ordinance (Title 12, Chapter 12.08), which restricts the hours of construction and sets quantitative dBA limits to control noise impacts on sensitive receptors.

The Project's incremental contribution to cumulative noise impacts is considered from two perspectives:

- Short-Term (Decommissioning) Noise: The Project's contribution to cumulative noise is the temporary noise from decommissioning activities. These activities are geographically dispersed across 248 individual sites and will occur intermittently over a 20-year period. It is unlikely that a decommissioning project at one site would occur simultaneously and in close enough proximity to another major construction project to create a combined, significant noise increase. More importantly, the Project's decommissioning noise is required to comply with the County's strict Noise Ordinance limits and the built-in controls of PDF-NOI-1. Because the Project's own noise contribution is controlled to a less-than-significant level by these enforceable standards, its contribution to any potential cumulative impact is not cumulatively considerable.
- Long-Term (Operational) Noise: The Project's long-term cumulative contribution is a beneficial reduction in ambient noise. By permanently eliminating industrial noise sources—including 24-hour pumps and loud, intermittent workover rigs—the Project helps to lower the overall ambient noise baseline in numerous communities. This is a positive contribution to the cumulative noise environment.

Because the Project's temporary noise contribution is managed to less-than-significant levels by existing ordinances and is geographically and temporally dispersed, its contribution is not cumulatively considerable. The long-term cumulative effect is beneficial. Therefore, the cumulative noise impact is less than significant.

5.13.5 Level of Significance Before Mitigation

Based on the analysis presented in this chapter, all potential impacts related to noise and vibration are determined to be less than significant or no impact.

The Project would have a less than significant impact with respect to temporary increases in ambient noise (Threshold NOI-1) and the generation of groundborne vibration (Threshold NOI-2). This is because all temporary decommissioning activities are required to comply with the mandatory and enforceable standards of the County Noise Ordinance and the Project's built-in controls. The long-term effect of the Project is a beneficial reduction in operational noise.

The Project would have no impact with respect to exposing people to excessive airport noise (Threshold NOI-3), as it does not introduce new permanent sensitive receptors into airport noise zones.

The Project's contribution to cumulative noise and vibration impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant, no mitigation measures are required.

5.13.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to noise or vibration.

This finding is based on the Project's mandatory compliance with existing regulations and the inclusion of built-in controls that are part of the Project's design. These include:

- PDF-NOI-1 (Title 12 Noise Ordinance Amendment): Eliminates the current exemption for oil and gas wells from the Noise Control Ordinance, providing a new, enforceable mechanism to manage noise impacts on surrounding communities during all phase-out and decommissioning activities.
- PDF-LU-1 and PDF-LU-2: The Project's built-in mandates require the permanent cessation of industrial operations and the complete removal of noise-generating infrastructure.

Because the Project does not result in significant impacts to noise or vibration, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.13.7 Level of Significance After Mitigation

All potential impacts related to noise and vibration were determined to be less than significant or no impact without the need for mitigation measures. Therefore, the level of significance remains less than significant.

No significant and unavoidable adverse impacts related to noise or vibration have been identified. The Project’s overall effect on the noise environment is expected to be beneficial over the long term, as it will permanently eliminate industrial noise sources from numerous communities and make all oil and gas activities fully subject to the County’s Noise Ordinance.

5.13.8 References

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CHAPTER 5.14 POPULATION AND HOUSING

This section of the EIR evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts related to population, housing, and employment within the unincorporated areas of Los Angeles County. The analysis establishes the baseline for these conditions and evaluates whether the Project's regulatory action to phase out an industrial land use would induce substantial unplanned population growth or displace existing housing or people. In accordance with CEQA Guidelines, this analysis considers socioeconomic factors, such as the displacement of jobs, only to the extent that they could result in a physical environmental impact.

The discussion is informed by official state, regional, and local demographic data and growth forecasts. Key sources include the County General Plan (including its Housing Element), and regional projections from the Southern California Association of Governments' (SCAG) 2024–2050 Connect SoCal plan and its associated Demographics and Growth Forecast. These documents provide the existing and projected baseline against which the Project's potential impacts are measured.

During the scoping period, commenters raised the issue that phasing out oil production would make large areas of land available for new uses, including housing. As shown in Table 2-1: Summary of Scoping Comments Received, it was noted that this could induce substantial population growth in the County. The analysis in this chapter is responsive to these comments and evaluates the project's potential to directly or indirectly induce population growth.

5.14.1 Environmental Setting

5.14.1.1 Regulatory Setting

Federal Regulations

No federal regulations directly govern local population growth in a way that is applicable to this Project. The federal government's role is primarily centered on data collection and providing protections for federally funded actions that cause displacement.

U.S. Census Bureau

The U.S. Census Bureau is the primary federal agency responsible for collecting and disseminating demographic data for the United States. Data from the Decennial Census and the American Community Survey (ACS) on population, housing, and employment form the foundational baseline for all state, regional, and local growth forecasts. The regional projections from SCAG, which are used in this EIR, are based on this federal data.

Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA)

This federal law provides protections and assistance for people and businesses displaced as a result of projects that receive federal funding. The URA is not applicable to the Project for two reasons:

- The Project is a local regulatory action and receives no federal funding.
- As will be discussed in the impact analysis, the Project does not displace any existing housing or people.

Summary of Federal Population and Housing Considerations

The federal government's primary role in the context of population and housing for this Project is providing the baseline demographic data through the U.S. Census Bureau. Federal laws related to displacement do not apply. Therefore, the analysis of population and housing impacts is governed by the state, regional, and local planning frameworks that guide growth in California.

State and Regional Laws, Regulations, and Policies

State and regional planning laws and agencies establish the official forecasts for population, housing, and employment growth that local jurisdictions, like Los Angeles County, must use for planning purposes. This top-down framework ensures that local plans are consistent with regional and statewide objectives.

California Housing Element Law (Government Code § 65580 et seq.)

State law requires all local governments to adopt a comprehensive, long-term Housing Element as part of their General Plan. This law mandates that jurisdictions plan to meet the existing and projected housing needs of all economic segments of the community. Local governments must identify and zone adequate sites to accommodate their share of the region's housing needs. The Project is consistent with this law as it does not construct housing, nor does it impede the County's ability to meet its housing goals on other available land.

California Relocation Assistance Act (Government Code § 7260 et seq.)

This state act establishes the requirement for public agencies to provide relocation payments and assistance to individuals, businesses, or farm operations that are displaced as a result of a public project. This act is not applicable to the Project because, as will be discussed in the impact analysis, the Project does not displace any existing housing or people.

Southern California Association of Governments (SCAG)

The Southern California Association of Governments (SCAG) is the federally recognized Metropolitan Planning Organization (MPO) for the six-county region that includes Los Angeles. As the MPO, SCAG is responsible for preparing the long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Connect SoCal 2024–2050 contains the official regional growth forecast. The Growth Forecast Appendix of this plan provides the baseline and projected data for population, housing, and

employment for all jurisdictions in the region, including the unincorporated areas of Los Angeles County. These SCAG forecasts are the basis for the existing conditions analysis in this EIR. The Project is consistent with the Connect SoCal plan as it does not induce population growth beyond these official regional projections.

Regional Housing Needs Allocation (RHNA)

The Regional Housing Needs Allocation (RHNA) is the state-mandated process to identify the total number of new housing units that each jurisdiction must plan for in its Housing Element. For the 6th Cycle (2021–2029), SCAG allocated 90,052 units to unincorporated Los Angeles County across various income categories. The Project does not conflict with the County's RHNA obligations as it does not propose or prevent housing development needed to meet these state-mandated targets.

Summary of State and Regional Population and Housing Considerations

The state and regional regulatory framework provides a comprehensive and integrated system for managing growth. The Department of Finance (DOF) provides the core demographic data used by the Department of Housing and Community Development (HCD) and SCAG to establish housing goals through the Regional Housing Needs Allocation (RHNA) process. SCAG, in turn, uses this data to create the official long-term growth forecast in Connect SoCal.

This framework provides the official baseline and future projections used to analyze the Project's impacts. The Project is consistent with this framework as it does not generate unplanned growth, conflict with regional forecasts, or impede the County's ability to meet its RHNA housing obligations. Furthermore, state laws regarding relocation assistance for displaced persons are not applicable, as the Project causes no displacement.

Local Plans and Policies

The County of Los Angeles manages population growth and housing development through a framework led by the General Plan and implemented by specific housing ordinances.

General Plan

The General Plan, particularly its Housing and Land Use Elements, provides the County's primary policy framework for accommodating population growth and meeting housing needs.

- Housing Element: The 6th Cycle Housing Element (2021–2029) provides a comprehensive overview of demographics and housing conditions in the unincorporated areas. It identifies sufficient sites to accommodate the County's Regional Housing Needs Allocation (RHNA) and establishes the goals and policies to guide housing supply and affordability. While the Project does not construct housing, it is consistent with the Housing Element as it does not conflict with or impede the County's ability to meet its housing goals on other designated parcels. Key supportive policies include:
    - Policy 1.1: Make available through land use planning and zoning an adequate inventory of vacant and underutilized sites to accommodate the County's Regional Housing Needs Assessment (RHNA) allocation.
    - Policy 2.2: Encourage mixed-use developments along major commercial and transportation corridors.

    - Policy 3.1: Promote mixed-income neighborhoods and a diversity of housing types throughout the unincorporated areas to increase housing choices for all economic segments of the population.
    - Policy 6.2: Allocate federal and state resources toward the preservation of housing, particularly for low-income households, near employment and transit.
- Land Use Element: The Land Use Element supports housing goals by encouraging diverse and efficient land use patterns. The Project is consistent with these policies by phasing out a heavy industrial use, which can improve compatibility with adjacent residential areas and make land available for future uses consistent with the General Plan. Key policies include:
    - Policy LU 5.1: Encourage a mix of residential land use designations and development regulations that accommodate various densities, building types, and styles.
    - Policy LU 5.3: Support a mix of land uses that promote bicycling and walking, and reduce vehicle miles traveled (VMT).
    - Policy LU 5.9: Preserve key industrially designated land for intensive, employment-based uses.
    - Policy LU 5.10: Encourage employment opportunities and housing to be developed in proximity to one another.

County Housing Ordinances

The County has adopted several ordinances to address specific housing needs. These ordinances apply to new residential development and are therefore not directly applicable to the Project, which is a regulatory phase-out of an industrial use. They include:

- Inclusionary Housing Ordinance: This ordinance requires new residential projects to dedicate a portion of their units as affordable housing.
- Interim and Supportive Housing Ordinance: This ordinance facilitates the development of housing and services to address homelessness.

Summary of Local Population and Housing Considerations

The County's local planning framework, led by the General Plan and implemented through specific ordinances, is designed to accommodate the region's mandated housing growth in a planned and equitable manner. The General Plan's Housing and Land Use Elements provide the foundational policies and strategies to meet the County's RHNA obligations, while regulations like the Inclusionary Housing Ordinance provide the tools to ensure new development meets community needs.

The Project is consistent with this local framework. It does not propose any housing, nor does it conflict with or prevent the County from achieving its housing goals as outlined in the General Plan. The local plans and policies provide the context for managing regional growth, but the Project itself does not generate impacts related to them.

5.14.1.2 Existing Environmental Conditions

This section describes the baseline population, housing, and employment conditions in the unincorporated areas of Los Angeles County, based on official regional data and forecasts from the Southern California Association of Governments (SCAG).

Population

According to SCAG, the estimated 2025 population for the unincorporated areas of Los Angeles County is approximately 1.05 million people. This represents about 10% of the County's total population. The population of the unincorporated areas grew from 1,004,331 in the 2010 Census to 1,041,080 in the 2020 Census, an increase of approximately 3.7%. SCAG's Connect SoCal 2024–2050 plan projects that the population of the unincorporated areas will grow to approximately 1.12 million by the year 2050, reflecting the region's overall growth trend.

Housing

Based on SCAG data, there were approximately 305,000 housing units in the unincorporated areas in 2021. The housing stock is diverse, ranging from dense multi-family apartments in urban communities like East Los Angeles and Florence-Firestone to large-lot single-family homes in rural and suburban areas like the Antelope Valley and Rowland Heights. The County's 6th Cycle Housing Element (2021–2029) plans for the development of 90,052 new housing units to meet the state-mandated Regional Housing Needs Allocation (RHNA) target.

Employment

SCAG estimates there were approximately 290,000 jobs in the unincorporated areas in 2021. The oil and gas extraction sector represents a small fraction of this total employment. While the Project will result in the ultimate phase-out of jobs directly related to this sector, the Project's design—specifically the 20-year amortization schedule established in PDF-LU-1—ensures this is a gradual, managed economic transition rather than a sudden displacement. Furthermore, under CEQA Guidelines Section 15131, this socioeconomic effect is not considered a significant environmental impact as it does not lead to an adverse physical change in the environment by inducing population growth or physical blight. The Project also includes a specific objective to 'Support an Equitable Transition' for affected workers in coordination with broader County initiatives.

Jobs-Housing Balance

Jobs-housing balance is a metric used to analyze the relationship between employment opportunities and housing availability within a given area. In 2021, the jobs-housing balance in the unincorporated areas was approximately 0.95, indicating that the area is generally housing-rich. This metric is primarily used to evaluate the impacts of projects that propose significant new housing or employment. Since the Project phases out a small number of existing jobs over a long period and does not propose new housing, it would not substantially alter the jobs-housing ratio, and a detailed analysis is not applicable.

5.14.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if it would:

POP-1: Induce substantial population growth in an area, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure).

POP-2: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

5.14.3 Environmental Impacts

5.14.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis legally tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the implementation of the CAP would not induce substantial unplanned population growth or displace substantial numbers of existing people or housing, resulting in less than significant impacts without the need for mitigation (CAP PEIR, Chapter 3.14). Therefore, this analysis strictly evaluates the Project's direct and indirect demographic implications to ensure consistency with the CAP PEIR's findings. Because the Project does not generate significant physical population or housing impacts, this analysis focuses on demonstrating why programmatic mitigation measures from the CAP PEIR are not required.

The analysis of impacts to population and housing is qualitative and based on a direct evaluation of the Project's regulatory actions. The Project does not propose or facilitate new development and therefore has no "buildout projections." The foreseeable physical effects of the Project are limited to the decommissioning and restoration of existing industrial sites.

The methodology for evaluating impacts against the CEQA significance thresholds is as follows:

- Induce Population Growth (Threshold POP-1): The analysis considers whether the Project would induce substantial unplanned population growth by evaluating its potential to do so through three mechanisms: 1) directly, by constructing new homes; 2) indirectly, by creating a substantial number of new permanent jobs; or 3) indirectly, by extending major growth-enabling infrastructure into unserved areas.
- Displace People or Housing (Threshold POP-2): The analysis consists of a review of the Project's scope, as defined in the Project Description, to determine if it involves the demolition of any existing housing units or the displacement of any residents.

This methodology is based on the Project Description (Chapter 3), which defines the Project's actions, and does not speculate on the population or housing impacts of any potential future development on the restored sites. Any such proposals would be subject to a separate, project-level CEQA review.

5.14.3.2 Proposed Project Characteristics

The Project is a regulatory action to phase out an existing industrial land use and does not have any characteristics that would lead to population growth or displacement. The features of the Project relevant to the population and housing analysis are described below.

- No Housing Construction or Direct Growth: The Project is an ordinance that amends the County's General Plan and Zoning Code. It does not include the construction or entitlement of any new housing units and therefore does not directly induce population growth.
- No Indirect Growth from Employment or Infrastructure: The Project does not create new permanent employment that would attract new residents to the County; to the contrary, it will result in the phase-out of an existing industry over a 20-year period. The Project also does not involve the extension of major infrastructure, such as roads or sewer lines, into unserved areas that would remove a barrier to growth.
- No Displacement of Housing or People: The Project applies exclusively to parcels currently used for industrial oil and gas production . It does not involve the demolition of any existing housing units or the displacement of any residents.

5.14.3.3 Impact Analysis

This section evaluates whether implementation of the Revised Oil Well Ordinance would result in significant impacts to population and housing, based on the thresholds of significance identified in Section 5.14.2. The analysis is based on the qualitative methodology described in the preceding section and considers whether the Project's direct regulatory actions to phase out an industrial land use would induce unplanned growth or displace existing residents.

Impact 5.14-1: Would the proposed Project induce substantial population growth in an area, either directly (e.g., by proposing new homes or businesses) or indirectly (e.g., through extension of roads or other infrastructure)? [Threshold POP-1]

No Impact.

The Project would not induce substantial unplanned population growth either directly or indirectly. The Project is a regulatory action to phase out an existing industrial land use and does not include any components that would generate new population, housing, or permanent employment.

Direct population growth is typically induced by projects that construct new housing. The Project is an ordinance that amends the County's General Plan and Zoning Code; it does not include the construction or entitlement of any new housing units. Indirect population growth can occur if a project creates a substantial number of new, permanent jobs or if it extends major infrastructure into an unserved area. The Project does not create any new permanent jobs; to the contrary, it will result in the phase-out of an existing industry. The Project also does not involve the construction or extension of any growth-inducing infrastructure.

During the public scoping period for this EIR, commenters raised the concern that by phasing out an industrial use, the Project could indirectly induce growth by making former oil and gas sites available for redevelopment into new homes or businesses. While the Project does facilitate a long-term land use transition, this is not considered growth inducement under CEQA. Analyzing the impacts of this potential future development would be speculative, as there are no concrete proposals, and the type, density, and timing of any future use are unknown. Any future

development proposal on a restored site would be a separate project requiring its own discretionary approvals and an independent, project-level CEQA review at that time, where its specific impacts on population and housing would be analyzed. The Project itself does not entitle or approve any future development.

Finally, the official regional growth forecast is provided in SCAG's Connect SoCal 2024–2050 plan. The Project is consistent with this plan as it does not generate any population growth beyond what is already forecasted by SCAG.

Consistent with the programmatic findings of the CAP PEIR, because the Project does not construct housing, create new permanent jobs, or extend growth-inducing infrastructure, and because any potential future redevelopment of the restored sites is speculative and would require a separate CEQA review, the Project has no mechanism to induce substantial unplanned population growth. Therefore, no impact would occur.

Impact 5.14-2: Would the proposed Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, or displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? [Threshold POP-2]

No Impact.

A significant impact would occur if the Project's implementation were to directly result in the demolition of existing housing or the eviction of residents, necessitating the construction of replacement housing elsewhere.

The Project is a regulatory action that applies countywide, but most acutely affects the parcels currently used for oil and gas production, as inventoried in Appendix A. The Project does not involve the demolition of any existing housing units or the displacement of any residents. The ordinance does not affect any dwellings or require any person to relocate.

Because the Project has no components that would remove housing or displace people, it has no mechanism to cause this impact. Therefore, no impact would occur. This finding is consistent with the determination made in the Project's Initial Study.

5.14.4 Cumulative Impacts

A cumulative impact on population and housing would occur if the Project, in combination with other past, present, and reasonably foreseeable future projects, were to induce substantial unplanned growth beyond regional forecasts or contribute to widespread displacement. The geographic scope for this analysis is the Southern California Association of Governments (SCAG) region, which provides the official regional growth forecast.

The cumulative context for the region is one of planned and managed growth. SCAG's Connect SoCal 2024–2050 plan provides the official, long-term forecast for population, housing, and employment for all local jurisdictions. This regional planning framework is designed to accommodate future growth in a sustainable manner.

As determined in the preceding analysis, the Project would have no impact on population growth or housing displacement. The Project does not construct housing, create new permanent jobs, or extend growth-inducing infrastructure. It also does not displace any existing homes or residents.

Because the Project does not induce any growth or cause any displacement, its incremental contribution to any potential cumulative impact is zero. The Project is consistent with the SCAG regional growth forecast and does not contribute to any unplanned increase in population or housing demand. Therefore, the Project's contribution is not cumulatively considerable, and the cumulative impact on population and housing is less than significant.

5.14.5 Level of Significance Before Mitigation

Based on the analysis presented in this chapter, all potential impacts related to population and housing are determined to be less than significant or no impact.

The Project would have no impact with respect to inducing substantial population growth (Threshold POP-1) or displacing existing housing or people (Threshold POP-2). This is because the Project is a regulatory action that does not construct housing, create new permanent jobs, or affect any residential properties.

The Project's contribution to cumulative population and housing impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant or no impact, no mitigation measures are required.

5.14.6 Mitigation Measures

The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to population and housing. All project-level impacts were determined to be no impact, and the Project's contribution to cumulative impacts was found to be less than significant. Therefore, no mitigation measures are required.

5.14.7 Level of Significance After Mitigation

All potential impacts related to population and housing were determined to be less than significant or no impact without the need for mitigation measures. Therefore, the level of significance remains less than significant.

No significant and unavoidable adverse impacts related to population and housing would occur as a result of the Project.

5.14.8 References

State of California

California Department of Finance (DOF). Various years. Population Projections and Demographic Reports.

California Department of Housing and Community Development (HCD). 2021. 6th Cycle Regional Housing Needs Allocation Plan.

California Government Code, Section 65580 et seq. (Housing Element Law).

California Government Code, Section 7260 et seq. (California Relocation Assistance Act).

Regional

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Los Angeles, CA.

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County of Los Angeles

County of Los Angeles. 2021. 2021-2029 Housing Element of the Los Angeles County General Plan.

County of Los Angeles. 2015. Los Angeles County General Plan 2035.

County of Los Angeles, Department of Regional Planning. 2025. Revised Oil Well Ordinance Initial Study.

Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

Federal

U.S. Census Bureau. 2010 and 2020. Decennial Census of Population and Housing.

Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

CHAPTER 5.15 PUBLIC SERVICES

This section of the EIR evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to public services in the unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would increase the demand for services to the point that new or physically altered governmental facilities would be required to maintain acceptable service ratios or response times. The services evaluated include fire protection, police protection, schools, parks, and other public facilities.

The analysis considers both short-term and long-term effects. Short-term impacts relate to the potential, temporary demand for services—primarily fire and police—during the decommissioning and restoration of well sites. Long-term impacts are related to the permanent elimination of the unique service demands associated with industrial oil and gas facilities (such as hazardous materials response) and the fact that the Project does not induce population growth that would increase demand for schools or parks.

This chapter is organized to present the environmental and regulatory setting, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods used to assess potential impacts, and the results of the impact analysis. The evaluation is based on information from the Project's Initial Study, the General Plan (Public Services and Facilities Element and Safety Element), and data from local service providers.

A comment was received during the scoping period concerning the potential for an increased demand for public services. As detailed in Table 2-1: Summary of Scoping Comments Received, it was noted that the foreseeable redevelopment of the oil field sites for residential or commercial uses would create new demand for public services. This chapter considers this comment and evaluates the potential for the project to result in the need for new or expanded public services.

5.15.1 Environmental Setting

5.15.1.1 Regulatory Setting

Federal Regulations

The provision of local public services such as fire protection, police protection, public schools, and parks is primarily a function of state and local government in the United States. Federal agencies such as the U.S. Department of Justice, the Department of Education, and the Federal Emergency Management Agency (FEMA) provide funding, technical assistance, and national data, but they

do not establish or enforce local service ratios, response times, or other performance standards that are the subject of this CEQA analysis.

Because local public services are not governed by a direct federal regulatory framework for the purposes of CEQA, the analysis in this EIR focuses on the plans, policies, and standards of the specific local service providers—such as the Los Angeles County Fire and Sheriff's Departments—and the General Plan.

State Regulations

State law establishes the primary safety and planning frameworks for the provision of local public services. For the Project, the most relevant state regulations are those governing fire safety during industrial decommissioning activities. For other services like schools and parks, state law provides frameworks for mitigating the impacts of new development, which are not applicable to this Project.

Fire Protection

State fire safety regulations are established in the California Building Standards Code and the Public Resources Code, providing a comprehensive framework for structural safety and wildfire prevention.

- California Building and Fire Codes (Title 24): The 2022 California Building Code (CBC, Part 2) and the 2022 California Fire Code (CFC, Part 9) are key components of the California Building Standards Code. These codes set the minimum statewide standards for fire-resistive construction, emergency access, fire protection systems, and the safe handling and storage of hazardous and flammable materials. These codes are directly applicable to the Project, as all temporary decommissioning activities, including any "hot work" (e.g., welding or cutting) and the management of flammable materials on site, must be conducted in strict compliance with the Fire Code to ensure on-site safety and prevent off-site impacts.
- Wildfire Regulations (Public Resources Code & Title 14): Public Resources Code Sections 4201-4204 require the California Department of Forestry and Fire Protection (CAL FIRE) to map lands into Fire Hazard Severity Zones (FHSZ) based on fuel, topography, and weather. These maps are a key land use planning tool. For lands designated as State Responsibility Areas (SRAs), the SRA Fire Safe Regulations (Title 14, CCR) establish minimum wildfire protection standards for any development or construction activity. These standards include requirements for emergency vehicle access, water supply for fire suppression, and fuel modification zones (defensible space). These regulations are highly relevant as numerous oil and gas sites identified in Appendix A are located in or adjacent to High or Very High Fire Hazard Severity Zones. All decommissioning activities in these areas must adhere to state fire prevention standards to minimize the risk of igniting a wildfire.

Police Protection

Local law enforcement services are governed by the California Penal Code, which provides the statutory basis for law enforcement, and agencies like the Commission on Peace Officer Standards and Training (POST) set statewide standards for officer training. However, there are no state laws that mandate specific service ratios (e.g., officers per 1,000 residents) or response time standards

for local sheriff's departments. These performance metrics are established at the local level through the County's own planning and budgetary processes.

Public Schools

Public schools are governed by the California Education Code. Senate Bill 50 (SB 50) (Government Code § 65995) establishes that the payment of statutory developer fees is the "exclusive method of considering and mitigating impacts on school facilities" from new development. School districts are authorized under Education Code § 17620 to levy these fees on new residential and commercial construction to fund school facilities. As the Project does not construct any new buildings, it does not trigger the assessment of these fees.

Parks and Recreation

The Quimby Act (Government Code § 66477) is the primary state law for funding local parks. It authorizes cities and counties to require the dedication of land or the payment of in-lieu fees for park and recreational purposes as a condition of approval for new residential subdivisions. As the Project is not a residential subdivision and does not create new residential-based demand for parks, the Quimby Act is not applicable.

Summary of State Public Service Considerations

The most relevant state regulations for this Project are the California Fire and Building Codes, which will govern the safety of all temporary decommissioning activities, particularly in wildfire hazard zones. For other public services such as police, schools, and parks, the primary authority for establishing service levels and planning for facilities rests with local agencies, not the state. State laws that provide for mitigating the impacts of new residential development (such as SB 50 for schools and the Quimby Act for parks) are not applicable to this Project.

Local Regulations

The County of Los Angeles provides public services through a comprehensive framework led by the foundational policies of the General Plan, with specific, enforceable standards and operational plans managed by individual County departments.

Relevant County General Plan Goals and Policies

- Safety Element
    - Goal S 3: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.
        - Policy S 3.4: Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire resistant building materials and vegetation.
        - Policy S 3.6: Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.

        - Policy S 3.9: Adopt by reference the County of Los Angeles Fire Department Strategic Fire Plan, as amended.
    - Goal S 4: Effective County emergency response management capabilities.
        - Policy S 4.1: Ensure that residents are protected from the public health consequences of natural or manmade disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
        - Policy S 4.2: Support County emergency providers in reaching their response time goals.
        - Policy S 4.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- Public Services and Facilities Element
    - Goal PS/F 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.
        - Policy PS/F 1.2: Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.
        - Policy PS/F 1.4: Ensure the adequate maintenance of infrastructure.

Fire Protection

Fire protection and emergency medical services in the unincorporated areas are provided by the Los Angeles County Fire Department (LACoFD), which operates under the policy guidance of the General Plan and the legal framework of the County Fire Code.

- County General Plan: The Safety Element of the General Plan establishes the overarching goals for protecting communities from fire hazards.
- Los Angeles County Fire Code (Title 32): The County adopts and amends the California Fire Code to set local standards for emergency access, fire flow (water supply), hydrant spacing, and fire-safe practices. These regulations are directly applicable to the Project, as all temporary decommissioning activities must be conducted in strict compliance with the Fire Code to ensure on-site safety.
- Wildfire Protection and Fuel Modification: For the numerous Project sites located within a Very High Fire Hazard Severity Zone (VHFHSZ), the Fire Code is particularly stringent. Any ground disturbance or use of equipment in these areas must adhere to fire prevention protocols. The LACoFD's Fuel Modification Unit provides guidelines for creating "defensible space" by modifying or replacing combustible vegetation with low-fuel plants to create a buffer from wildlands. These standards will be applied to ensure temporary decommissioning work does not increase wildfire risk.
- Developer Fees: The County maintains a Developer Fee Program, authorized under the state Mitigation Fee Act, to fund new fire stations and equipment needed to serve new development. This program is not applicable to the Project because the Project is a regulatory phase-out of an existing use and does not involve new construction that would create a new, permanent demand on fire services.

Police Protection

Police protection in the unincorporated areas is provided by the Los Angeles County Sheriff's Department (LASD), which provides services through a network of geographically assigned Sheriff's Stations.

- County General Plan: The Safety Element provides the policy basis for ensuring adequate law enforcement services to protect public safety.
- LASD Operational Standards: The LASD establishes its own operational standards, staffing levels, and response time goals for each station's patrol area. These are determined through the County's annual budget process based on population, land use, and calls-for-service data. Because the Project does not induce population growth, it would not increase the residential or commercial service population within any station's patrol area and therefore would not trigger the need for new or expanded facilities or increased staffing levels.
- Law Enforcement Developer Fees: To address the impacts of new development in high-growth areas like the Santa Clarita Valley, the County adopted a Law Enforcement Facilities Fee Program in 2008. This fee funds facilities and equipment needed to serve new populations generated by development. This program is not applicable to the Project because it does not involve new development and therefore does not generate the new population that would create a demand on LASD services.

Public Schools

Educational services in the unincorporated areas are provided by numerous public school districts.

- County General Plan: The Public Services and Facilities Element contains policies related to ensuring adequate school capacity to serve the community.
- Local School District Facility Planning: Under state law, individual school districts are responsible for planning for their own facility needs. They do so by calculating student generation rates from new residential development and are authorized to levy developer fees on new construction to fund new classrooms. As the Project is a regulatory phase-out of an industrial use and does not construct any new residential units, it does not generate any new students. Therefore, it creates no demand for new school facilities and does not trigger the developer fee process.

Parks and Recreation

The Los Angeles County Department of Parks and Recreation operates parks and recreational facilities in the unincorporated areas.

- County General Plan: The Parks and Recreation Element establishes the County's goal of providing adequate, accessible parkland to serve residents, often measured by a parkland-per-capita standard.
- Parkland Dedication: The need for new parks is driven by increases in the residential population. The County's parkland dedication ordinance, which implements the state Quimby Act, requires new residential subdivisions to provide park space or pay in-lieu fees. As the Project is not a residential subdivision and does not generate new residents, it does not create new demand for parks or affect the County's ability to meet its service standards. The long-term removal of industrial facilities from sites adjacent to existing parks, such as the Kenneth Hahn State Recreation Area, represents a beneficial impact.

Summary of Local Public Service Considerations

The County has a comprehensive framework for providing public services, as described in the General Plan and implemented by individual service departments. The most relevant local regulations for the Project are the County Fire Code requirements that will ensure the safety of temporary decommissioning activities, particularly in wildfire hazard zones. For all other services (police, schools, parks), the Project does not generate new population-based demand and therefore does not conflict with local service plans or trigger the need for new facilities or developer fees.

5.15.1.2 Existing Environmental Conditions

Public services in the unincorporated areas of Los Angeles County are provided by a range of County departments and specialized local agencies. The following describes the existing conditions for the primary services relevant to the Project, with a specific focus on the unique service demands and land use conflicts created by the existing oil and gas facilities that are the subject of this ordinance.

Fire Protection and Emergency Medical Services

The Los Angeles County Fire Department (LACoFD) is an "all-risk" agency providing a full spectrum of fire suppression, emergency medical, and life safety services to all unincorporated areas and 60 contract cities. As of 2023, the department employed approximately 4,953 personnel operating out of 175 fire stations, utilizing a fleet of engine companies, paramedic squads, and specialized apparatus. The LACoFD maintains rigorous standards for emergency response times, aiming for 5 minutes or less in urban areas, 8 minutes or less in suburban areas, and 12 minutes or less in rural areas.

Existing oil and gas facilities create a unique and specialized demand on the LACoFD that extends beyond standard emergency response. These industrial sites present a baseline risk of low-frequency, high-consequence events such as well blowouts, tank farm fires, and the release of toxic gases like hydrogen sulfide (H2S). These potential incidents require a specialized and resource-intensive response from the LACoFD's Hazardous Materials (HazMat) Units, which consist of personnel trained in chemical identification, containment, and decontamination for industrial incidents.

Furthermore, many of the oil and gas sites identified in Appendix A are located in areas with significant wildland fire hazards. The State and County designate these lands as High or Very High Fire Hazard Severity Zones (VHFHSZ) due to the presence of highly combustible native vegetation. The risk in these zones is often exacerbated by seasonal Santa Ana winds, which can create conditions for extreme and rapidly spreading wildfires. The co-location of industrial facilities containing flammable materials and multiple potential ignition sources (e.g., engines, electrical equipment) within these high-hazard zones is a significant baseline risk that requires proactive prevention and response planning from the LACoFD.

Police Protection

The Los Angeles County Sheriff's Department (LASD) provides a full range of police protection services to the unincorporated areas and 42 contract cities through its network of geographically assigned Sheriff's Stations. The LASD is responsible for proactive patrol, criminal investigation, and emergency response. Existing oil and gas facilities generate a specific baseline demand for LASD services related to securing large, often remote industrial sites to prevent trespassing and vandalism, which could lead to safety or environmental incidents. Critically, the LASD is the lead agency for coordinating emergency evacuations and managing traffic control in the event of a significant industrial accident at one of these facilities, requiring close inter-agency coordination with the LACoFD.

Public Schools

Educational services in the unincorporated areas are provided by numerous independent public school districts. The need for new school facilities is driven entirely by residential population growth. The key baseline condition relevant to the Project is not service capacity, but rather the existing land use and safety conflict where several oil and gas facilities are located on or immediately adjacent to school campuses. This co-location involves the daily operation of heavy industrial equipment within sight and sound of classrooms and playgrounds, creating baseline concerns regarding the potential exposure of sensitive populations (children and staff) to routine industrial emissions and the acute risks of an accident or emergency.

Parks and Recreation

The Los Angeles County Department of Parks and Recreation operates a vast network of facilities, including regional parks, natural areas, and trails. The need for new parks is driven by population growth. A significant baseline condition for this Project is the direct conflict between active industrial use and public recreational use, as several major County parks contain active oil and gas wells. This includes facilities within the Kenneth Hahn State Recreation Area. The visual and auditory intrusion of this industrial infrastructure into areas intended for passive recreation and environmental enjoyment detracts from the recreational experience and can pose safety risks along public trails.

Other Public Facilities (Including Public Libraries)

The County of Los Angeles Public Library system provides services through a network of local branches. The need for new or expanded library facilities is directly related to population growth. The County mitigates the impacts of new residential development on library services by collecting a library facilities mitigation fee. As the Project generates no new residents, the key baseline condition is simply the existing provision of library services in the unincorporated areas.

5.15.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant impact on public services if it would Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services listed below.

PS-1 (Fire Protection)	Would the project impact fire protection services?
PS-2 (Police Protection)	Would the project impact police protection services?
PS-3 (Schools)	Would the project impact public schools?
PS-4 (Parks)	Would the project impact parks?
PS-5 (Other Public Facilities)	Would the project impact other public facilities, such as libraries?

5.15.3 Environmental Impacts

5.15.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis legally tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR evaluated the public service implications of phasing out fossil fuel infrastructure and concluded that the implementation of the CAP would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (CAP PEIR, 3.15-18 to 3.15-20). The CAP PEIR determined that these programmatic public service impacts were less than significant, and therefore no mitigation measures were adopted. This analysis strictly evaluates the Project’s direct and indirect public service implications to ensure consistency with the CAP PEIR's findings. Because the Project does not generate significant physical public service impacts, and any temporary decommissioning demands are strictly managed by existing regulations (such as the County Fire Code), this analysis focuses on demonstrating why programmatic mitigation measures from the CAP PEIR are not required.

The evaluation of impacts to public services is based on a service demand analysis to determine if the Project would require the provision of new or physically altered governmental facilities in order to maintain acceptable service standards. This analysis considers the Project's effect on the existing demand for fire protection, police protection, schools, parks, and other public facilities.

This assessment is based on a qualitative, policy-based review of the Project's regulatory actions at a countywide scale. It considers:

- Population Growth: Whether the Project generates new residents or students that would increase demand for population-based services such as schools, parks, and libraries.
- Emergency Service Demand: Whether the Project's temporary (decommissioning) or long-term (cessation) effects would substantially alter the demand for fire and police services, particularly specialized services like hazardous materials (HazMat) response.
- Consistency with Service Standards: Whether the Project would affect the ability of service providers, such as the LACoFD and LASD, to meet their adopted performance objectives (e.g., response times).
- Existing Land Use Conflicts: The baseline condition of oil and gas facilities located on or immediately adjacent to existing public service sites, such as schools and parks.

Sources of information include:

- The Project Description (Chapter 3) and Appendix A (Existing Conditions Site Inventory).
- The Environmental Setting (Chapter 4), particularly Section 4.14, Public Services and Utilities.
- The County General Plan, specifically the Public Services and Facilities Element and the Safety Element.
- Official plans and service standards from local providers, including the Los Angeles County Fire Department and the Los Angeles County Sheriff's Department.
- The Project's Initial Study.
- A review of land use maps to identify the proximity of Project sites to existing schools, parks, and other public facilities.

This methodology is consistent with CEQA Guidelines Appendix G and is used to determine whether the Revised Oil Well Ordinance would result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities.

5.15.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22), the Baldwin Hills Community Standards District (CSD), the Newhall Ranch Specific Plan, and the County General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once nonconforming, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Public service-related project characteristics include:

- No Generation of New Service Demands: The Project is a regulatory action that does not construct new housing or businesses. Therefore, it does not generate new residents, employees, or students. This means it creates no new permanent demand for population-based services such as schools, parks, libraries, or routine fire and police protection.
- Elimination of Specialized Emergency Service Demands: The phase-out and decommissioning of oil and gas facilities will permanently eliminate the unique and high-risk demands these industrial sites place on the Los Angeles County Fire Department. This includes reducing the baseline risk of incidents requiring specialized industrial firefighting and hazardous materials (HazMat) response.

- Temporary Service Demands During Decommissioning: The Project will result in temporary decommissioning activities at the sites identified in Appendix A. These activities, similar to construction sites, could generate a minor, short-term demand for routine public services, such as a potential need for a fire, emergency medical, or police response to a worksite.
- Resolution of Existing Land Use Conflicts with Public Facilities: The Project's requirement to remove all oil and gas infrastructure will resolve existing land use and safety conflicts where these industrial facilities are currently located on or immediately adjacent to public schools and parks, such as the Kenneth Hahn State Recreation Area.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in a net long-term reduction in demand for public services, particularly for specialized and high-risk emergency response. While minor temporary demands may occur during decommissioning, they are not expected to be substantial. The Project will also have a long-term beneficial impact by improving safety and resolving land use conflicts at existing school and park sites.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for public services, considering both temporary and permanent changes to service demands.

5.15.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure, which create unique public service demands, will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance, well abandonment, and restoration, which apply throughout the decommissioning process.

From a public services standpoint, the Project is expected to result in two primary types of effects:

- Short-term, temporary demands on emergency services, which could occur during the decommissioning of existing facilities. This includes the potential for industrial accidents, fires, or medical emergencies at a worksite that would require a response from fire and police personnel. Such effects are anticipated to be minor, infrequent, and consistent with the service demands of a typical, temporary construction site.
- Long-term beneficial changes to public service demands, including the permanent elimination of the specialized and high-risk demand for industrial firefighting and hazardous materials (HazMat) response, thereby reducing the baseline risk of high-consequence industrial incidents. The Project also resolves existing land use conflicts by removing industrial operations from sites adjacent to public schools and parks, improving safety for students, staff, and park users.

This section evaluates the Project’s impacts relative to each of the applicable CEQA significance thresholds for public services identified in Section 5.15.2. The analysis uses a qualitative, service-demand approach that considers whether the Project's effects would be substantial enough to exceed the existing capacity of service providers, thereby requiring the construction of new or

physically altered facilities. The analysis considers both the temporary and permanent effects of implementation and evaluates the Project's consistency with the County General Plan and the established operational standards of local service providers like the LACoFD and LASD.

Impact 5.15-1: Would the proposed Project impact fire protection services? [Threshold PS-1]

Less Than Significant Impact.

The Project would not result in a substantial adverse physical impact associated with the need for new or physically altered fire protection facilities. The Project's temporary demand on fire services would be minor, while its long-term effect would be a beneficial reduction in the demand for specialized emergency response.

Short-Term Impacts (Decommissioning)

The Project's reasonably foreseeable physical activities involve the decommissioning and restoration of existing well sites. These temporary activities will involve the use of heavy equipment and the handling of materials that could, like any construction site, create a minor, short-term increase in the potential for fires, accidents, or medical emergencies requiring a response from the Los Angeles County Fire Department (LACoFD).

However, this temporary impact is considered less than significant. The potential increase in calls for service would be intermittent, geographically dispersed across oil & gas sites over a 20-year period, and is not anticipated to be substantial enough to exceed the existing capacity of the LACoFD. The temporary demand would not require the construction of new or physically altered fire stations to maintain acceptable response times. Furthermore, all decommissioning activities must comply with the mandatory safety standards of the Los Angeles County Fire Code (Title 32), especially for sites located in Very High Fire Hazard Severity Zones (VHFHSZ), to minimize the risk of fire.

Long-Term Impacts (Operation)

The Project's long-term, permanent "operational" effect is the cessation of all oil and gas production, which will result in a permanent and beneficial reduction in the demand for fire protection services.

The Project will permanently eliminate the unique and specialized service demands that existing oil and gas facilities place on the LACoFD. This includes eliminating the baseline risk of low-frequency, high-consequence industrial incidents such as well blowouts, tank farm fires, and toxic gas releases. This, in turn, reduces the long-term demand for specialized and resource-intensive services from the LACoFD's Hazardous Materials (HazMat) Units. This is a significant benefit to public safety and allows for the reallocation of these specialized resources.

Consistent with the programmatic findings of the CAP PEIR, because the Project's temporary demand on fire services would be minor and would not necessitate new facilities, and its long-term impact is a beneficial reduction in service demand, the impact on fire protection services is less than significant.

Impact 5.15-2: Would the proposed Project impact police protection services? [Threshold PS-2]

Less Than Significant Impact.

The Project would not result in a substantial adverse physical impact associated with the need for new or physically altered police protection facilities. The Project's temporary demand on police services would be minor, while its long-term effect would be a beneficial reduction in the demand for services related to industrial sites.

Short-Term Impacts (Decommissioning)

The temporary decommissioning and restoration of well sites could generate a minor, short-term demand for police services from the Los Angeles County Sheriff's Department (LASD). The presence of equipment and materials at these sites could create a potential for theft or vandalism, and the movement of heavy equipment could require occasional traffic control.

However, this temporary impact is considered less than significant. This potential demand is similar to that of any typical construction site, which the LASD routinely serves. The demand would be intermittent, geographically dispersed across numerous sites over a 20-year period, and is not anticipated to be substantial enough to exceed the existing capacity of the LASD or require the construction of new or physically altered sheriff's stations to maintain acceptable service levels.

Long-Term Impacts (Operation)

The Project's long-term, permanent "operational" effect is the cessation of all oil and gas production, which will result in a permanent and beneficial reduction in the demand for police protection services.

The Project will permanently eliminate the baseline demand for LASD services related to these large industrial facilities. This includes eliminating calls for service related to trespassing, vandalism, and theft at existing oil & gas sites. It also permanently removes the need for the LASD to dedicate resources for managing traffic and potential evacuations in the event of a major industrial accident, such as a fire or hazardous materials release.

Consistent with the programmatic findings of the CAP PEIR, because the Project's temporary demand on police services would be minor and would not necessitate new facilities, and its long-term impact is a beneficial reduction in service demand, the impact on police protection services is less than significant.

Impact 5.15-3: Would the proposed Project impact public schools? [Threshold PS-3]

No Impact.

A project impacts public schools if it induces population growth that generates new students, thereby increasing demand on school facilities to the point that new or physically altered schools are needed. As established in Section 5.14, Population and Housing, the Project is a regulatory action that does not construct any new housing units and does not induce population growth. Therefore, the Project will not generate any new students, will create no new demand on any school district, and would not require the construction of new or physically altered school facilities.

While the Project would have no impact on the need for new school facilities, temporary decommissioning activities may occur near existing schools. The potential short-term, construction-related physical impacts of these activities on schools, which are considered sensitive uses, are a critical part of this CEQA review. However, these impacts are analyzed in their respective, topic-specific sections of this EIR. For example:

- Noise and vibration from equipment are discussed in Section 5.13, Noise.
- Air quality emissions (dust and exhaust) are discussed in Section 5.3, Air Quality.
- Public safety and hazardous materials are discussed in Section 5.11, Hazards and Hazardous Materials.

Furthermore, the Project will have a long-term beneficial impact on public schools. The Environmental Setting identified that several existing oil and gas facilities are located on or immediately adjacent to school campuses. The Project's requirement to decommission and remove these industrial facilities will permanently resolve this existing land use and safety conflict, improving the environment for students and staff at those locations.

Consistent with the findings of the CAP PEIR, because the Project is a regulatory phase-out of industrial facilities that generates no new students, no impact on public schools would occur.

Impact 5.15-4: Would the proposed Project impact parks? [Threshold PS-4]

No Impact.

A project impacts parks if it induces population growth that increases the use of existing parks or creates new demand for recreational facilities, thereby requiring the construction of new or physically altered parks. As established in Section 5.14, Population and Housing, the Project is a regulatory action that does not construct any new housing units and does not induce population growth. Therefore, the Project will not generate any new residents who would increase the use of existing parks and would not require the construction of new or physically altered park facilities.

While the Project would have no impact on the need for new park facilities, temporary decommissioning activities may occur on or adjacent to existing parks. The potential short-term, construction-related physical impacts of these activities on parks, which are considered sensitive

uses, are a critical part of this CEQA review. However, these impacts are analyzed in their respective, topic-specific sections of this EIR. For example:

- Noise and vibration affecting park users are discussed in Section 5.13, Noise.
- Air quality emissions (dust and exhaust) are discussed in Section 5.3, Air Quality.
- Aesthetic impacts on scenic vistas from park viewpoints are discussed in Section 5.1, Aesthetics.

Furthermore, the Project will have a long-term beneficial impact on existing parks. The Environmental Setting identified that several active oil and gas facilities are located directly within major County recreational areas, including the Kenneth Hahn State Recreation Area. The Project's requirement to decommission and remove this industrial infrastructure will permanently resolve this existing land use conflict. This is a beneficial impact that will improve public safety, aesthetics, and the recreational experience for all park users.

Because the Project generates no new demand for parks, no impact would occur.

Impact 5.15-5: Would the proposed Project impact other public facilities, such as libraries? [Threshold PS-5]

No Impact.

A project impacts other public facilities, such as libraries, if it induces population growth that increases the use of these facilities, thereby requiring the construction of new or physically altered facilities to maintain service levels.

As established in Section 5.14, Population and Housing, the Project is a regulatory action that does not construct any new housing units and does not induce population growth. Therefore, the Project will not generate any new residents who would increase the demand on public libraries or any other population-based public facilities.

Because the Project generates no new demand, it would not require the construction of new or physically altered facilities. Therefore, no impact on other public facilities would occur. This finding is consistent with the determination made in the Project's Initial Study.

5.15.4 Cumulative Impacts

A significant cumulative impact on public services would occur if the Project's demand for services, when combined with the demand from other past, present, and reasonably foreseeable future projects, would require the construction of new or altered governmental facilities, causing a secondary physical environmental impact. The geographic scope for this analysis is the service area of the respective County departments and local agencies.

The cumulative context for the region is one of planned growth, as forecasted by SCAG's Connect SoCal 2024–2050 plan. This anticipated development will incrementally increase the demand for all public services. This cumulative demand is managed through a comprehensive regulatory

framework where impacts from new development are typically mitigated on a project-by-project basis through compliance with codes and the payment of developer fees.

Fire and Police Protection

Cumulative development in Los Angeles County and neighboring jurisdictions will increase the demand for fire and law enforcement services. This increased demand could necessitate the construction or expansion of facilities, which would have the potential to result in an adverse impact on the environment. These impacts are mitigated through project-level compliance with the County Fire Code and through local funding mechanisms, such as the County's Developer Fee Program for fire facilities and the Law Enforcement Fees for North Los Angeles County, which fund facilities and equipment needed to serve new development.

The Project's incremental contribution to this cumulative impact is not considerable. The short-term demand on fire and police services during decommissioning is minor, temporary, and geographically dispersed. More importantly, the Project's long-term contribution is a beneficial reduction in service demand. By permanently eliminating 248 high-risk industrial sites, the Project reduces the overall demand for specialized fire (HazMat) and police (industrial incident response) services, which is a positive cumulative effect.

Public Schools

Cumulative residential development across the region will increase student populations, creating a demand for new school facilities. This cumulative impact is addressed by state law. Senate Bill 50 (SB 50) establishes that the payment of statutory school impact fees by new development projects is deemed to be "full and complete mitigation" of impacts on school facilities. The Project, however, does not induce population growth and generates zero new students. Therefore, it makes no contribution to the cumulative demand for school facilities and does not trigger the SB 50 fee requirement.

Parks and Recreation

Cumulative residential growth increases demand for parks and recreational facilities. This cumulative impact is mitigated on a project-by-project basis through the Quimby Act, which allows the County to require land dedication or in-lieu fees from new residential subdivisions. The Project does not create new residential subdivisions and generates zero new residents, and therefore makes no contribution to the cumulative demand for parks.

Other Public Facilities (Libraries)

Cumulative residential development will increase the population of library users, and this cumulative impact is addressed through the County's library facilities mitigation fee, which is applied to new residential projects. The Project does not generate new residents and therefore makes no contribution to the cumulative demand for library services and does not trigger the mitigation fee.

Because the Project does not generate new, permanent demand for any population-based public service (schools, parks, libraries) and provides a long-term beneficial reduction in demand for emergency services (fire and police), its contribution to any cumulative impact on public services is not cumulatively considerable. Therefore, the cumulative impact is less than significant.

5.15.5 Level of Significance Before Mitigation

Based on the analysis presented in this chapter, all potential impacts related to public services are determined to be less than significant or no impact.

The Project would have a less than significant impact on fire and police protection services. The temporary demand for services during decommissioning would be minor and would not require new facilities, while the long-term effect is a beneficial reduction in specialized emergency service demand.

The Project would have no impact on schools, parks, or other public facilities, as it does not induce population growth and therefore creates no new demand for these population-based services.

The Project's contribution to cumulative public service impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant or no impact, no mitigation measures are required.

5.15.6 Mitigation Measures

The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to public services. All project-level impacts were determined to be less than significant or no impact, and the Project's contribution to cumulative impacts was found to be less than significant. Therefore, no mitigation measures are required.

5.15.7 Level of Significance After Mitigation

All potential impacts related to public services were determined to be less than significant or no impact without the need for mitigation measures. Therefore, the level of significance remains less than significant.

No significant and unavoidable adverse impacts related to public services would occur as a result of the Project.

5.15.8 References

State of California

California Building Standards Commission. 2022. 2022 California Building Standards Code, California Code of Regulations Title 24. (Including Part 2, California Building Code, and Part 9, California Fire Code).

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California Education Code.

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California Health and Safety Code, Section 13000 et seq.

California Penal Code.

California Public Resources Code, Sections 4201-4204.

Regional

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Los Angeles, CA.

County of Los Angeles

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County of Los Angeles. Los Angeles County Code. (Including Title 12 – Environmental Protection, Title 22 – Planning and Zoning, and Title 32 – Fire Code).

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Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

Los Angeles County Fire Department (LACoFD). 2023. Departmental Data and Statistics.

CHAPTER 5.16 RECREATION

This section analyzes the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts on recreation within the unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would increase the use of existing parks and recreational facilities such that substantial physical deterioration would occur, or whether the Project would require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

The analysis evaluates both short-term and long-term recreational impacts. Short-term impacts are related to the temporary effects on park users and facilities during the decommissioning of oil and gas infrastructure located within or adjacent to existing parks. Long-term impacts are related to the fact that the Project does not induce population growth and therefore does not increase demand on park capacity, as well as the permanent beneficial impact of removing industrial operations from recreational areas.

This chapter is organized to present the environmental and regulatory setting relevant to recreation, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods used to assess potential impacts, and the results of the impact analysis. Mitigation measures, where applicable, are also identified.

This analysis draws upon information contained in the Initial Study, the County General Plan (specifically the Parks and Recreation Element), and data from the Los Angeles County Department of Parks and Recreation, as well as CEQA Appendix G thresholds.

The County received comments related to recreation during the public scoping period. As summarized in Table 2-1: Summary of Scoping Comments Received, commenters noted the potential for oil field lands to be converted to public parks and open space. This chapter considers these comments and analyzes the project's potential impacts on recreational facilities.

5.16.1 Environmental Setting

5.16.1.1 Regulatory Background

Federal Regulations

National Park Service (NPS) Organic Act

The National Park Service (NPS) Organic Act of 1916 establishes the mission of the NPS, which is to conserve scenery, natural and historic objects, and wildlife within National Park System units for unimpaired public enjoyment. This Act is directly relevant because some oil and gas facilities identified in Appendix A are located within the Santa Monica Mountains National Recreation Area, a unit of the National Park System managed by the NPS.

Land and Water Conservation Fund (LWCF) Act

This federal act provides matching grants to state and local governments for the acquisition and development of public outdoor recreation areas.

- Section 6(f) Conversion Provision: This provision prohibits the conversion of parkland acquired or developed with LWCF funds to a non-recreational use without the approval of the U.S. Secretary of the Interior. This provision is potentially relevant as County parks affected by the Project, such as Kenneth Hahn State Recreation Area, may have received LWCF grants in the past. If so, any decommissioning or restoration activities that result in a change of use would be subject to federal oversight.

U.S. Forest Service (USFS) Regulations

The National Forest Management Act (NFMA) governs how National Forests are managed for multiple uses, including public recreation. This act is relevant because some existing oil wells are located within the Angeles National Forest.

Summary of Federal Recreation Considerations

The federal regulatory framework for recreation is most relevant where the Project's area of effect overlaps with federally owned or funded lands. For the oil and gas sites on federal land (NPS, USFS), any future decommissioning is a federal action subject to these regulations and the National Environmental Policy Act (NEPA) and is outside the County's direct authority. For County-owned parks, the primary federal consideration is whether LWCF funds were used, which would add a layer of federal oversight to any change in the use of the parkland.

State Laws, Regulations, and Policies

Quimby Act (Government Code § 66477)

Enacted in 1975, the Quimby Act is the primary state law that allows cities and counties to require the dedication of land or the payment of in-lieu fees for park and recreational purposes as a condition of approval for new residential subdivisions. This act is not applicable to the Project because the Project is a regulatory phase-out of an industrial use and is not a residential subdivision.

Public Park Preservation Act of 1974

The Public Park Preservation Act (Public Resources Code § 5400-5409) is the state's primary instrument for protecting existing parkland from being converted to other uses. The act requires that a local agency may not acquire any real property that is in use as a public park for any non-park use unless it provides substitute parkland of comparable characteristics and value, ensuring no net loss of parkland.

This act is relevant to the Project because some decommissioning activities will occur within existing public parks, such as Kenneth Hahn State Recreation Area. While these temporary activities do not represent a permanent "conversion" of parkland, any site restoration plans must ensure that the land is returned to a state that is suitable for public recreational use, consistent with the protective intent of this act.

Park Financing and Maintenance Acts

- Mello-Roos Community Facilities Act of 1982: This act provides a method for local governments to establish Community Facilities Districts to finance public capital facilities and services, including parks, especially in developing areas.
- Landscaping and Lighting Act of 1972: This act authorizes local governments to establish assessment districts to fund the construction and maintenance of public landscaping and local public parks.

These acts provide funding mechanisms that are typically tied to new development or existing communities and are not directly triggered by the Project's actions.

Summary of State Recreation Considerations

The most relevant state law for the Project is the Public Park Preservation Act, which ensures that any land within an existing park that is temporarily disturbed for decommissioning is ultimately restored for recreational use. State laws designed to mitigate the impacts of new residential growth (Quimby Act) or provide financing for new facilities (Mello-Roos) are not applicable to this Project. Overall, state law provides a strong framework for protecting existing parkland, which is consistent with the Project's long-term beneficial impact of removing industrial uses from parks.

Local Laws, Regulations, and Policies

County of Los Angeles General Plan

The County of Los Angeles provides park and recreational facilities and services through a framework led by the General Plan, with specific requirements for new development established in the County Code and funding supported by voter-approved measures.

The Parks and Recreation Element of the General Plan is the County's primary policy document for recreation. It establishes the goals and standards for providing adequate, accessible, and high-quality parkland and recreational opportunities for all residents. A key policy is to achieve a

parkland standard of four acres of local parkland and six acres of regional parkland per 1,000 residents. The General Plan guides the acquisition of new parkland and the management of existing facilities to meet the needs of the County's diverse communities.

While most policies from the General Plan are focused on managing impacts from new development, the following goals and policies establish the County's overall vision for recreation and are relevant to the Project's context:

- Goal P/R 1: Enhanced active and passive park and recreation opportunities for all users.
    - Policy P/R 1.5: Ensure that County parks and recreational facilities are clean, safe, inviting, usable and accessible.
- Goal P/R 3: Acquisition and development of additional parkland.
    - Policy P/R 3.1: Acquire and develop local and regional parkland to meet the County goal of four acres of local parkland and six acres of regional parkland per 1,000 residents.
    - Policy P/R 3.4: Expand the supply of regional parks by acquiring land that would provide a buffer from potential threats that would diminish the quality of the recreational experience.
- Goal P/R 5: Protection of historical and natural resources on County park properties.
    - Policy P/R 5.3: Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.

The General Plan's framework is designed to address the recreational needs generated by population growth. As the Project does not induce population growth, the policies related to acquiring new parkland to meet service standards are not directly applicable for assessing an adverse impact. However, the Project is highly consistent with the General Plan's goals for improving the quality and safety of existing parks. By removing incompatible industrial infrastructure from within major recreational areas like Kenneth Hahn State Recreation Area, the Project directly supports policies to protect natural resources on park properties and ensure they are safe and inviting for all users.

Los Angeles County Code (Quimby Act Requirements)

The County implements the state Quimby Act through its own subdivision ordinance, found in Title 21 of the County Code.

- Parkland Dedication: The County Code requires developers of new residential subdivisions to dedicate land for local parks or, alternatively, to pay an in-lieu fee. The amount of land is calculated based on the General Plan's parkland-per-capita standard to ensure that new residential growth contributes its fair share to meeting local park needs.
- Applicability to the Project: This local ordinance, like the state Quimby Act it implements, is tied directly to the creation of new housing units. As the Project is a regulatory phase-out of an industrial use and is not a residential subdivision, these requirements are not applicable.

Local Park Funding Measures

Los Angeles County residents have a long history of supporting local parks through voter-approved funding measures.

- Proposition A (1992 and 1996): These two successful ballot measures created the Regional Park and Open Space District and generated billions of dollars in funding for over 1,500 park, recreation, and open space projects throughout the County before they expired.
- Measure A (2016): Building on the success of Proposition A, voters approved Measure A, a parcel tax that provides a permanent, dedicated source of local funding for parks. Generating more than $90 million annually, Measure A funds the development of new parks and the maintenance of existing facilities, with a focus on high-need communities.

These funding measures provide the resources to implement the goals of the General Plan. While not a direct regulation on the Project, they form part of the baseline context for park provision in the County.

Los Angeles Countywide Parks and Recreation Needs Assessment (PNA)

Adopted by the Board of Supervisors in 2016, the Parks Needs Assessment (PNA) was a comprehensive study to quantify the need for parks and recreational facilities across the County and identify priority projects. The 2022 Parks Needs Assessment Plus (PNA+) updated this effort, building on the original report with new data and analyses related to population vulnerability, environmental benefits, and conservation priorities. The PNA+ serves as the County's strategic guide for future park planning and investment, informing decision-making to ensure park resources are distributed equitably. While this foundational document guides park development, its recommendations are aimed at addressing existing deficits and planning for future growth; it does not impose direct regulations on the Project.

County Trails Manual

The County Trails Manual provides guidance for the planning, design, and maintenance of hiking, equestrian, and mountain biking trails. Its goal is to facilitate the development of a high-quality, multi-use trail network. The manual is used by the County to review new development projects to ensure they are consistent with and, where appropriate, contribute to the regional trail system. As the Project is a regulatory action and not a new development, the specific design guidelines of the Trails Manual are not directly applicable. However, the Project is consistent with the manual's goals, as the removal of industrial infrastructure from areas near existing or planned trails is a long-term beneficial impact.

County Park Design Guidelines and Standards

The County Park Design Guidelines and Standards are intended to guide County staff, design professionals, and other agencies on how to design and develop parks that meet County standards and expectations. The manual offers input from Department of Parks and Recreation staff, other departments, and outside partners such as nonprofit organizations and private developers with an interest in park design. The guidelines and standards address topics for recreational facilities such as spatial organization, circulation, landscaping, utilities, and sustainable products and plants.

Summary of Local Recreation Considerations

The County's local framework for recreation is led by the policy vision of the General Plan's Parks and Recreation Element, supported by strategic guidance from the Parks Needs Assessment Plus (PNA+) and dedicated funding from Measure A. The primary regulatory tools for expanding the park system, such as the County's ordinance implementing the Quimby Act, are designed to mitigate the impacts of new residential development.

Because the Project does not induce population growth or involve residential subdivision, these local regulations are not applicable for assessing an adverse impact. However, the Project's long-term effect of removing industrial uses from existing parks is highly consistent with the General Plan's goals of providing safe, high-quality, and accessible recreational facilities.

5.16.1.2 Existing Environmental Conditions

The existing environmental setting for recreation in the unincorporated areas is defined by a vast and diverse system of parks and open spaces, an existing deficit in parkland relative to the County's goals, and a significant baseline conflict where industrial oil and gas operations are co-located with public recreational facilities.

Existing Recreational Facilities

The Los Angeles County Department of Parks and Recreation operates and maintains a comprehensive park system serving both unincorporated areas and many cities. This system includes local and regional parks, natural areas, lakes, swimming pools, gardens, and an extensive network of multi-use trails. Countywide, this system provides a total of 608 acres of local parkland and 68,986 acres of regional parkland.

According to the County General Plan, the goal for parkland is to provide four acres of local parkland per 1,000 residents. Based on the unincorporated population of 1,057,192 and the available 608 acres of local parkland, the current provision is approximately 0.57 acres of parkland per 1,000 residents. This indicates a significant existing deficit in local parkland available to serve the existing population, a baseline condition that is addressed through various County planning efforts.

Baseline Recreational Conflicts

A defining characteristic of the existing recreational setting for this Project is the direct land use conflict between active industrial oil and gas operations and public parklands. Several of the County's most significant regional parks, which serve thousands of residents, currently contain active oil and gas extraction facilities on County-owned land.

- Kenneth Hahn State Recreation Area: This major regional park in the Baldwin Hills is a critical open space for numerous dense urban communities. It currently contains a significant portion of the Inglewood Oil Field, with numerous active pumpjacks, tanks, and service roads located within the park's boundaries, creating visual and auditory intrusions for park visitors.

- Whittier Narrows Recreation Area: This large, multi-use park in the San Gabriel Valley, which includes lakes, sports fields, and natural areas, also contains active oil wells. These industrial operations are interspersed with areas dedicated to public recreation.
- Castaic Sports Complex: This facility in the Santa Clarita Valley, which includes athletic fields heavily used by the public, is located adjacent to active oil field operations.

This co-location of industrial uses within areas designated for public recreation represents a significant existing conflict. The presence of oil infrastructure detracts from the aesthetic and recreational experience, can generate noise and odors, and may pose safety risks along public trails or near recreational facilities. The Project's requirement to decommission and remove this infrastructure from County-owned land is a central feature of the existing environmental setting. It is important to note that the Project's requirements do not apply to any oil and gas facilities located on adjacent federally- or state-owned property, which are outside the County's land use jurisdiction.

5.16.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines and County practice, a project would normally have a significant effect on the environment if the project:

R-1 Would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

R-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

R-3 Interfere with regional trail connectivity.

5.16.3 Environmental Impacts

5.16.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis legally tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR evaluated the recreational implications of phasing out fossil fuel infrastructure and concluded that the implementation of the CAP would not increase the use of existing parks or require the construction of new recreational facilities (CAP PEIR, Chapter 3.16). The CAP PEIR determined that these programmatic recreational impacts were less than significant, requiring no mitigation. This analysis strictly evaluates the Project’s direct and indirect recreational implications to ensure consistency with the CAP PEIR's findings. Because the Project does not generate new population or physical recreational demand, this analysis focuses on demonstrating why programmatic mitigation measures from the CAP PEIR are not required.

The evaluation of impacts on recreation is based on an analysis of the Project's potential to increase demand on existing recreational facilities or to physically interfere with their use. This analysis uses the

County of Los Angeles General Plan's parkland goals and CEQA significance thresholds to determine if the Project would result in a significant environmental impact.

This assessment is based on a qualitative, policy-based review of the Project's regulatory actions and their reasonably foreseeable consequences. It considers:

- Recreational Demand: Whether the Project would induce population growth, thereby increasing the number of users at existing parks and potentially accelerating their physical deterioration or creating the need for new facilities.
- Physical Effects on Existing Facilities: Whether the Project's temporary (decommissioning) or long-term (cessation) effects would physically damage, alter, or interfere with the use of existing parks, trails, or other recreational resources. This includes an evaluation of the Project's consistency with the County's General Plan Parks and Recreation Element and the County Trails Manual.
- Existing Land Use Conflicts: The analysis considers the baseline condition where industrial oil and gas facilities are co-located with public recreational areas.

Key Concepts and Terminology

For the purposes of this analysis, the following key concepts are used:

- Local Park: A park that meets neighborhood needs with facilities such as picnic areas, playgrounds, and sports fields. The County's General Plan goal is to provide four acres of local parkland per 1,000 residents.
- Regional Park: A large park (typically over 100 acres) of regional importance that offers a wide range of active and passive recreation, such as Kenneth Hahn State Recreation Area.

Approach

The primary analytical approach is to determine if the Project generates new demand for parks. As established in Section 5.14, Population and Housing, the Project does not induce population growth. Therefore, it does not increase the number of park users or exacerbate the County's existing parkland deficit.

The analysis also evaluates the direct physical effects of the Project. This includes reviewing the location of the oil and gas sites in Appendix A in relation to existing parks and trails to assess potential temporary impacts from decommissioning and the long-term beneficial impacts from removing industrial infrastructure. This methodology is consistent with CEQA Guidelines Appendix G and is used to determine whether the Revised Oil Well Ordinance would result in a substantial adverse change to recreational resources or their use.

5.16.3.2 Proposed Project Characteristics.

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22), the Baldwin Hills Community Standards District (CSD), the Newhall Ranch Specific Plan, and the County General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Under the Project, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Recreation-related project characteristics include:

- No Generation of New Recreational Demand: The Project is a regulatory action that does not construct new housing. Therefore, it does not generate new residents who would increase the use of existing parks, trails, or other recreational facilities.
- No Construction of New Recreational Facilities: The Project does not include the construction or expansion of any new parks or recreational facilities. Its physical activities are limited to the decommissioning and restoration of existing industrial sites.
- Resolution of Existing Conflicts on Parklands (PDF-LU-1 and PDF-LU-2): A primary characteristic of the Project is the mandatory requirement to decommission and completely remove all existing oil and gas infrastructure near parklands. This will permanently resolve the existing land use conflict where industrial operations are co-located or adjacent to public recreational uses in major regional parks such as the Kenneth Hahn State Recreation Area and Castaic Sports Complex.
- Temporary Activities within Recreational Areas: The Project will result in temporary decommissioning activities at well sites located within or adjacent to existing parks and trails. These activities will be short-term, localized, and subject to all applicable County regulations.
- Consistency with Regional Trail Goals: The Project does not construct any new barriers and will not interfere with existing or planned regional trail connectivity. The long-term removal of industrial infrastructure and service roads may create future opportunities to enhance trail connectivity in areas previously occupied by oil field operations.
- Jurisdictional Application: The Project's decommissioning requirements apply to oil and gas facilities on lands under the County's jurisdiction, including County-owned parks. The ordinance does not apply to facilities located on adjacent or nearby federally- or state-owned property, which are outside the County's land use authority.

Overall, implementation of the Revised Oil Well Ordinance is anticipated to result in a long-term beneficial impact on recreation. The Project will not create new demand on recreational facilities. Instead, it will improve the safety, aesthetics, and usability of existing, highly valued regional parks by permanently removing incompatible industrial infrastructure. While minor, temporary disruptions may occur in localized areas of parks during decommissioning, these impacts would be short-term and limited in extent.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for recreation.

5.16.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a phased 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance, well abandonment, and restoration, which apply throughout the decommissioning process.

From a recreation standpoint, the Project is expected to result in two primary types of effects:

- Short-term, temporary disruptions to recreational areas, which could occur during the decommissioning of facilities located within or adjacent to existing parks and trails. These effects could include temporary access restrictions to localized areas, as well as noise and visual intrusion for park users.
- Long-term beneficial changes to the quality of recreational facilities. The Project does not induce population growth and therefore will not increase the use or accelerate the deterioration of existing parks. Instead, it will permanently remove incompatible industrial infrastructure from within major public parks, such as Kenneth Hahn State Recreation Area, which will improve public safety, aesthetics, and the overall recreational experience for park users.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds for recreation identified in Section 5.16.2. The analysis considers both the temporary and permanent effects of implementation, using a qualitative approach that considers the Project's effect on population-based demand and its direct physical interaction with existing recreational facilities.

Impact 5.16-1: Would the proposed Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? [Threshold R-1]

No Impact.

An increase in the use of existing recreational facilities that could lead to substantial physical deterioration is a direct result of population growth. A significant impact under this threshold occurs when a project introduces a new user population to parks that are at or near capacity, thereby accelerating wear and tear on turf, equipment, and other amenities.

As established in Section 5.14, Population and Housing, the Project is a regulatory action that does not construct new housing and does not induce population growth. Therefore, the Project will not generate any new residents who would increase the use of existing neighborhood and regional parks or other recreational facilities. Because the Project does not increase park use, it would not cause or accelerate the substantial physical deterioration of any recreational facility.

While the Project would have no impact on park use and deterioration from an increase in population, temporary decommissioning activities may occur on or adjacent to existing recreational facilities. The potential short-term, construction-related physical impacts of these activities on the recreational environment (such as noise and visual impacts on park users) are a critical part of this CEQA review. These impacts are analyzed in their respective, topic-specific sections of this EIR, including Section 5.1, Aesthetics, and Section 5.13, Noise.

Consistent with the programmatic findings of the CAP PEIR, because the Project generates no new park users and does not induce population growth, it would not cause or accelerate the substantial physical deterioration of any recreational facility. Therefore, no impact would occur.

Impact 5.16-2: Would the proposed Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment? [Threshold R-2]

No Impact.

A significant impact under this threshold would occur if the Project either included the construction of new recreational facilities that could cause an adverse physical effect, or if it created a new demand that would necessitate the construction or expansion of such facilities. The Project does neither.

The need for new or expanded recreational facilities is a direct function of population growth. As established in Section 5.14, Population and Housing, the Project is a regulatory action that does not construct new housing and does not induce population growth. Therefore, the Project will not generate any new residents who would create a new demand for recreational facilities, and it would not require their construction or expansion.

Furthermore, the Project itself does not include the construction of any new parks or recreational facilities. Its physical activities are limited to the decommissioning and restoration of existing industrial sites.

Because the Project creates no new demand for recreational facilities and does not include their construction, no impact would occur.

Impact 5.16-3: Would the proposed Project interfere with regional trail connectivity? [Threshold R-3]

No Impact.

A significant impact would occur if the Project were to construct new physical barriers that would sever an existing or planned regional trail, or otherwise permanently interfere with public access to the regional trail network. The Project would not interfere with regional trail connectivity; to the contrary, its long-term effects would be beneficial.

The Project is a regulatory action that does not involve the construction of any new buildings, roads, fences, or other infrastructure that could physically block or sever a trail. The Project's physical activities are limited to the decommissioning and removal of existing industrial facilities.

During the temporary decommissioning of a well site located immediately adjacent to an existing public trail, short-term, localized trail detours or temporary closures may be necessary to ensure public safety. However, these would be minor, short-lived management measures, like those for any construction project adjacent to a public right-of-way. They would not constitute a permanent or substantial interference with the regional trail system.

Over the long term, the Project will have a beneficial impact on regional trail connectivity. By requiring the removal of industrial infrastructure, including security fencing, pipelines, and service roads, the Project will eliminate existing barriers and obstacles in areas near current or planned trails. The restoration of these sites could create new opportunities to expand the trail network and improve connectivity in areas previously occupied by oil field operations.

Consistent with the programmatic findings of the CAP PEIR, because the Project does not construct any barriers that would interfere with trail connectivity and its long-term effects of removing industrial infrastructure are strictly beneficial, no impact would occur.

5.16.4 Cumulative Impacts

A significant cumulative impact on recreation would occur if the Project, when combined with other past, present, and reasonably foreseeable future projects, would result in a cumulatively considerable increase in the demand for or a reduction in the availability of recreational facilities. The geographic scope for this analysis is Los Angeles County, inclusive of its incorporated and unincorporated areas, which share a regional population and park system.

The cumulative context for the region is one of planned and continued growth, as forecasted by SCAG's Connect SoCal 2024–2050 plan. This anticipated residential and commercial development will incrementally increase the regional population, which in turn will increase the demand for and use of local and regional parks, trails, and other recreational facilities. This cumulative increase in demand has the potential to accelerate the deterioration of existing parks and create the need for the construction of new facilities.

This cumulative impact is managed through a comprehensive local and regional planning framework. As new residential projects are proposed, they are required under state law (Quimby Act) and the Los Angeles County Code to mitigate their specific impacts on park capacity by dedicating parkland or paying in-lieu fees. These fees, along with other funding sources like the County's Measure A, are used to acquire and develop new parkland to meet the County's General Plan service goals and accommodate the growing population.

The Project's incremental contribution to this cumulative impact is not considerable; in fact, its long-term contribution is beneficial.

- Demand for Recreational Facilities: The primary driver of cumulative impacts on recreation is population growth. As established in Section 5.14, Population and Housing, the Project does not construct new housing and does not induce population growth. Therefore, the Project's contribution to the cumulative increase in demand for recreational facilities is zero.
- Availability of Recreational Facilities: The Project's long-term effect is to increase the quality and potentially the quantity of usable recreational land. By requiring the removal of industrial infrastructure from existing public parks, the Project contributes a long-term beneficial effect to the cumulative condition of the region's park system.

Because the Project does not generate any new demand for recreational facilities, its contribution to the cumulative impact of increased park use is not cumulatively considerable. Therefore, the cumulative impact on recreation is less than significant.

5.16.5 Level of Significance Before Mitigation

Based on the analysis presented, all potential impacts related to recreation are determined to be less than significant or no impact.

The Project would have no impact with respect to increasing the use of existing parks (Threshold R-1) or requiring the construction of new recreational facilities (Threshold R-2). This is because the Project does not induce population growth and therefore creates no new demand for recreational facilities. The Project would also have no impact on regional trail connectivity (Threshold R-3), as it does not construct any new barriers and its long-term effects are beneficial.

The Project's contribution to cumulative recreation impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant or no impact, no mitigation measures are required.

5.16.6 Mitigation Measures

No mitigation measures are required.

The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to recreation. All project-level impacts were determined to be no impact, and the Project's contribution to cumulative impacts was found to be less than significant. Therefore, no mitigation measures are required.

5.16.7 Level of Significance After Mitigation

No significant impacts were identified.

All potential impacts related to recreation were determined to be less than significant or no impact without the need for mitigation measures. Therefore, the level of significance remains less than significant. No significant and unavoidable adverse impacts related to recreation would occur as a result of the Project. The Project’s overall effect on recreation is expected to be beneficial over the long term, as it will permanently eliminate industrial uses from within existing public parks, improving safety and the recreational experience for users.

5.16.8 References

Federal

Land and Water Conservation Fund Act of 1965, as amended, 54 U.S.C. § 200301 et seq.

National Forest Management Act of 1976, 16 U.S.C. § 1600 et seq.

National Park Service Organic Act of 1916, 54 U.S.C. § 100101 et seq.

State of California

California Government Code, Section 66477 (Quimby Act).

California Public Resources Code, Sections 5400-5409 (Public Park Preservation Act of 1974).

Mello-Roos Community Facilities Act of 1982, California Government Code Section 53311 et seq.

Regional

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Los Angeles, CA.

County of Los Angeles

County of Los Angeles. 2011 (revised 2013). County Trails Manual.

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County of Los Angeles, Department of Parks and Recreation. 2016. Los Angeles Countywide Parks and Recreation Needs Assessment.

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Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

CHAPTER 5.17 TRANSPORTATION

This section analyzes the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to transportation within the unincorporated areas of Los Angeles County. Consistent with Senate Bill 743 (SB 743), the primary metric used in this analysis to evaluate transportation impacts under CEQA is Vehicle Miles Traveled (VMT). This approach aligns the analysis with state goals for reducing greenhouse gas emissions and promoting sustainable land use. The analysis also considers potential impacts related to transportation hazards and emergency access.

The evaluation considers both short-term and long-term effects on the transportation network. Short-term impacts relate to the temporary increase in VMT and potential traffic disruptions from decommissioning activities. This includes trips from workers commuting to oil and gas sites and, more significantly, trips from heavy haul trucks used to remove equipment and materials. Long-term impacts are related to the permanent elimination of the daily operational vehicle trips currently associated with the oil and gas facilities, which will result in a net reduction in regional VMT.

This chapter is organized to present the environmental and regulatory setting, the thresholds of significance used to evaluate impacts, the methods used in the evaluation, and the results of the impact assessment. The analysis is based on guidance from the Governor's Office of Planning and Research (OPR), regional plans from the Southern California Association of Governments (SCAG), and the County's General Plan.

During the public scoping period, the County received comments from the California Department of Transportation (Caltrans) regarding transportation. As shown in Table 2-1: Summary of Scoping Comments Received, these agencies recommended that the project include measures to manage construction traffic, schedule truck trips during off-peak hours, and ensure that emergency vehicle access is maintained at all times. The analysis in this chapter considers these comments and evaluates the potential effects of the project on the transportation network, including during the decommissioning and site restoration phases.

5.17.1 Environmental Setting

5.17.1.1 Regulatory Setting

Federal Regulations

U.S. Department of Transportation (DOT)

The U.S. DOT oversees the nation's transportation network through several sub-agencies. For this Project, the most relevant agency is the Federal Motor Carrier Safety Administration.

Federal Motor Carrier Safety Administration (FMCSA): The FMCSA is the lead federal agency responsible for regulating the safety of commercial motor vehicles (i.e., trucks) and their drivers. The FMCSA establishes and enforces a comprehensive set of safety regulations, including:

- Driver qualifications and commercial driver's license (CDL) standards.
- Hours-of-service rules to prevent driver fatigue.
- Vehicle inspection, repair, and maintenance requirements.
- Regulations for the secure transport of hazardous materials.

All heavy haul trucks used during the Project's decommissioning activities will be required to operate in full compliance with these mandatory federal safety regulations.

Federal Highway Administration (FHWA): The FHWA provides stewardship over the construction, maintenance, and preservation of the nation's highways. It sets national standards for the design and operation of roadways, including the Manual on Uniform Traffic Control Devices (MUTCD), which governs all traffic signs, signals, and road markings. The public roadways that will be used by Project-related traffic are part of this national system.

Summary of Federal Transportation Considerations

The federal government's role in transportation for this Project is not to set local CEQA significance thresholds, but to establish a comprehensive nationwide safety framework. The key federal consideration is that all temporary haul truck operations must adhere to the mandatory safety regulations set by the FMCSA. Compliance with these federal standards helps to ensure that temporary, Project-related truck traffic operates in a safe manner, thereby minimizing potential transportation hazards.

State Laws, Regulations, and Policies

Senate Bill 743 (SB 743) and the Shift to VMT

Enacted in 2013, Senate Bill 743 initiated a fundamental change in CEQA transportation analysis. The law required the Governor's Office of Planning and Research (OPR) to develop new CEQA guidelines that replace traffic delay and congestion (Level of Service, or LOS) with Vehicle Miles Traveled (VMT) as the primary metric for determining the significance of transportation impacts. This change was implemented to better align transportation analysis with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.

Pursuant to SB 743, CEQA Guidelines Section 15064.3 was added, providing the formal methodology for evaluating a project’s transportation impacts using VMT. To support this, OPR released its "Technical Advisory on Evaluating Transportation Impacts in CEQA" (2018). This document provides lead agencies with recommendations on screening criteria, methodology, and significance thresholds for VMT analysis. The analysis in this EIR is conducted in accordance with SB 743 and the OPR Technical Advisory.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) supports the state's climate goals by linking transportation funding with land use planning to promote more sustainable communities. Under SB 375, the California Air Resources Board (CARB) sets regional targets for reducing GHG emissions from passenger vehicles. Each Metropolitan Planning Organization (MPO), including SCAG, must prepare a Sustainable Communities Strategy (SCS) as part of its Regional Transportation Plan (RTP) to demonstrate how the region will meet its GHG reduction targets, primarily through VMT reduction. The Project is consistent with the goals of SB 375 as its long-term effect is a net reduction in VMT.

California Department of Transportation (Caltrans)

As the owner and operator of the state highway system, Caltrans has aligned its own environmental review procedures with the new VMT framework. The Caltrans Transportation Impact Study Guide (2020) establishes VMT as the agency's primary focus when reviewing local land use projects under CEQA. Caltrans recommends that lead agencies use the thresholds and guidance provided in OPR's Technical Advisory for their analysis. While Caltrans primarily focuses on VMT, it may still request a targeted analysis of operational safety for projects that could create a specific hazard on the state highway system.

Active Transportation and Complete Streets Policies

State law also promotes a multimodal transportation system through several acts:

- Assembly Bill 1358, the Complete Streets Act, requires cities and counties to plan for the needs of all roadway users, including bicyclists, pedestrians, and transit riders, in their General Plan Circulation Elements.
- The California Bicycle Transportation Act requires local jurisdictions to adopt bicycle master plans to be eligible for certain state funding.

While the Project does not construct any new transportation facilities, its long-term effect of removing industrial land uses is consistent with the broader state goal of creating safer and more compatible environments for active transportation in the communities where these facilities are located.

Assembly Bill 98 (Logistics and Truck Route Planning)

Enacted in 2024, AB 98 establishes new statewide standards for the location of logistics uses and the routing of heavy-duty trucks to minimize air quality and safety impacts on sensitive receptors. While the Project is a regulatory phase-out of industrial facilities and does not construct new logistics centers, the law's intent to protect communities from heavy truck traffic reinforces the need to carefully manage the temporary haul truck routes required during the Project's decommissioning phase.

Summary of State Transportation Considerations

The state's regulatory framework for transportation is unequivocally centered on reducing VMT to achieve statewide climate, air quality, and public health objectives. SB 743 provides the legal mandate and methodology for this approach. The Project is consistent with this state framework, as its primary long-term transportation impact is a beneficial reduction in VMT resulting from the permanent cessation of all vehicle trips associated with oil and gas operations.

Regional and Local Laws, Regulations, and Policies

Southern California Association of Governments (SCAG)

SCAG is the Metropolitan Planning Organization (MPO) for the six-county region and is responsible for developing the long-range regional transportation plan.

- Connect SoCal (2024–2050 RTP/SCS): The Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal 2024–2050, establishes the transportation vision for the region. It integrates land use and transportation planning to increase mobility options, reduce Vehicle Miles Traveled (VMT), and meet state-mandated greenhouse gas (GHG) reduction targets. Key goals of Connect SoCal relevant to the Project include improving air quality, supporting healthy and equitable communities, and adapting to a changing climate.

The Project is consistent with and supports the goals of Connect SoCal. By permanently eliminating the daily vehicle trips associated with industrial oil and gas sites, the Project results in a long-term net reduction in VMT, which directly helps the region meet its GHG emission reduction targets and improves air quality in communities with oil operations.

Los Angeles County Metropolitan Transportation Authority (Metro)

Metro is the primary transportation planning, programming, funding, and operating agency for Los Angeles County. Metro's plans and programs work to implement the regional vision set by SCAG.

- 2020 Long Range Transportation Plan (LRTP): This plan provides a 30-year financial blueprint for the projects and programs implemented by Metro. The Project is consistent with the LRTP's policy goals of promoting trip reduction strategies.
- Active Transportation Strategic Plan (ATSP): Metro's ATSP (adopted 2016, currently being updated) identifies strategies to encourage more walking and biking in the County, with a focus on enhancing safety and improving first/last mile connections to transit. While the Project does not construct new active transportation infrastructure, its long-term effect of removing heavy industrial truck traffic from local streets creates a safer and more pleasant environment that is more conducive to walking and bicycling.
- NextGen Bus Plan: This plan aims to create a more attractive and competitive bus system by focusing service on high-demand corridors and improving speed and reliability. The Project is consistent with this plan by reducing industrial truck traffic on local roadways, some of which are used as bus routes.
- Measure M: Approved by voters in 2016, this half-cent sales tax is the primary local funding source for transportation projects and programs in the County. While the Project does not receive Measure M funding, it is consistent with Measure M's overarching goal of easing traffic by contributing to a long-term, permanent reduction in VMT.

OurCounty Sustainability Plan (2025)

This comprehensive plan sets ambitious goals for a more sustainable future. Goal 8 specifically calls for a transportation system that enhances mobility while reducing car dependency. The plan includes Strategy 8A: Reduce vehicle miles traveled by prioritizing alternatives to single occupancy vehicles. The proposed Project is a direct implementation of this core sustainability strategy, as its primary long-term transportation effect is a net reduction in VMT.

General Plan

The Mobility Element of the General Plan provides the foundational local policy framework for the transportation system in the unincorporated areas. This element is guided by a vision of an efficient, interconnected, and safe multimodal transportation system that serves the needs of all users and aligns with state and regional goals for reducing Vehicle Miles Traveled (VMT).

While many of the Mobility Element's policies are focused on the design of new transportation facilities and accommodating future growth, the following goals and policies establish the County's core principles for managing the existing transportation network and are relevant to the analysis of the Project's temporary and long-term impacts:

- Goal M 4: An efficient multimodal transportation system that serves the needs of all residents.
    - Policy M 4.1: Expand transportation options that reduce automobile dependence.
    - Policy M 4.15: Reduce vehicle trips through the use of mobility management practices, such as the reduction of parking requirements, employer/institution-based transit passes, regional carpooling programs, and telecommuting.
    - Policy M 4.16: Promote mobility management practices, including incentives to change transit behavior and using technologies, to reduce VMTs.
- Goal M 6: The safe and efficient movement of goods.
    - Policy M 6.3: Designate official truck routes to minimize the impacts of truck traffic on residential neighborhoods and other sensitive land uses.
    - Policy M 6.4: Minimize noise and other impacts of goods movement, truck traffic, deliveries, and staging in residential and mixed-use neighborhoods.
- Goal M 1: Street designs that incorporate the needs of all users.
    - Policy M 1.1: Provide for the accommodation of all users, including pedestrians, motorists, bicyclists, equestrians, users of public transit, seniors, children, and persons with disabilities when requiring or planning for new, or retrofitting existing, transportation corridors/networks whenever appropriate and feasible.
    - Policy M 1.2: Ensure that streets are safe for sensitive users, such as seniors and children.

The Project is consistent with the Mobility Element. The long-term, permanent effect of the Project is a net reduction in VMT resulting from the elimination of all daily vehicle trips associated with the operation of oil and gas sites. This directly supports the General Plan's core objective of reducing automobile dependence and VMT. Furthermore, the General Plan's policies regarding goods movement provide the framework for managing the temporary impacts of haul trucks during decommissioning activities, ensuring that impacts on residential neighborhoods and sensitive land uses are minimized through the designation and use of official truck routes.

The Mobility Element is further implemented by several adopted plans:

- Los Angeles County Highway Plan: This plan provides the long-range vision for the highway network in the unincorporated areas, ensuring consistency with the General Plan. It focuses on preserving right-of-way corridors to accommodate future improvements and alternative modes of transportation, such as bus lanes and bikeways. The Project is consistent with this plan as it does not interfere with any planned highway routes.
- Los Angeles County Bicycle Master Plan (2012): This plan proposes a network of over 800 miles of new bikeways to create a more connected and safer cycling environment. The Project supports the

goals of this plan by contributing to a long-term reduction in industrial truck traffic on local streets, many of which are designated as existing or proposed bikeways.

- Vision Zero Action Plan: This plan forms the County's strategy to eliminate all traffic-related fatalities, with a focus on protecting the most vulnerable road users (pedestrians and bicyclists). The Project is consistent with this plan by permanently reducing heavy truck traffic which may contribute to traffic-related fatalities.
- Step by Step Los Angeles County (2019): This pedestrian master plan identifies specific actions and infrastructure projects to enhance walkability. The Project is consistent with this plan by permanently removing heavy industrial truck traffic associated with oil field operations from local streets.

County of Los Angeles Public Works

The County of Los Angeles Public Works (PW) provides the technical and procedural framework for implementing the County's transportation policies.

Transportation Impact Analysis Guidelines (2020): These guidelines establish the County's official methodology for conducting transportation analysis under CEQA, consistent with the state's SB 743 mandate. The guidelines confirm that Vehicle Miles Traveled (VMT) is the primary metric for determining significance. They provide specific screening criteria, analysis methodologies, and significance thresholds for new land use development projects. While the Project is a regulatory action and not a new development project subject to these specific study requirements, the PW guidelines provide the official VMT framework that informs this EIR's analysis.

Countywide Transportation Plans and Initiatives

The County has adopted numerous plans and initiatives aimed at creating a safer, more sustainable, and multimodal transportation system.

Summary of Regional and Local Transportation Considerations

The local and regional transportation framework is guided by a unified policy direction to reduce Vehicle Miles Traveled (VMT) and improve safety for all road users. This is established at the regional level by SCAG's Connect SoCal plan and implemented locally through the General Plan Mobility Element, Metro's long-range plans, and specific initiatives like the OurCounty Sustainability Plan and Vision Zero.

The Project is consistent with this framework. Its primary long-term transportation effect is a beneficial reduction in VMT, directly supporting the region's core climate and sustainability goals. Furthermore, the permanent removal of industrial truck traffic from local communities supports the County's goals of improving safety for pedestrians and bicyclists. The temporary impacts from haul trucks during decommissioning will be managed in accordance with the General Plan's goods movement policies.

5.17.1.2 Existing Environmental Conditions

The existing environmental setting for transportation in the unincorporated areas is defined by a multi-layered network of roadways, public transit, and active transportation facilities. The baseline for this analysis includes this physical network as well as the Vehicle Miles Traveled (VMT)

generated by existing land uses, including the daily vehicle trips associated with the oil and gas facilities that are the subject of this Project.

Roadway Network

The unincorporated areas are served by a comprehensive network of freeways, highways, and local streets that facilitate the movement of people and goods. The Highway Plan classifies these roadways to guide their development and management. The primary classifications include:

- Major Highways: These are the most highly traveled routes of countywide significance, typically with four or more lanes, such as major arterial roads that connect communities and provide access to the regional freeway system.
- Secondary Highways: These routes serve an areawide function but are less heavily traveled than major highways. They often act as collector streets, moving traffic from local residential streets to the major highway network.
- Limited Secondary Highways: These routes typically provide access to lower-density residential, rural, or mountain areas and are designed to be more in character with their surroundings.

Public Transportation and Active Transportation

Public Transit: Public transportation in the unincorporated areas is provided primarily by the Los Angeles County Metropolitan Transportation Authority (Metro), which operates an extensive network of bus and rail lines. Several municipal operators also provide service in areas adjacent to unincorporated communities.

Bicycle and Pedestrian Facilities: The unincorporated areas contain a developing network of bicycle and pedestrian facilities. This includes dedicated bicycle lanes on some major and secondary highways, multi-use paths along river corridors, and sidewalks, which are more prevalent in urbanized communities than in rural or hillside areas.

Existing Vehicle Miles Traveled (VMT)

Under SB 743, VMT is the primary metric for evaluating transportation impacts. The County has established the following VMT baseline for the unincorporated areas based on 2023 data:

- Residential VMT: The average resident generates 12.6 VMT per capita, per day.
- Employment VMT: The average employee generates 16.3 VMT per employee, per day.
- Total VMT: The average total VMT is 30.6 per service population (residents + employees), per day.

A key component of this existing baseline is the VMT generated by the ongoing operation and maintenance of the oil and gas sites subject to the Project. The daily operations of these industrial facilities generate a consistent number of vehicle trips, including:

- Worker Commute Trips: Employees traveling to and from the sites for daily shifts.
- Maintenance and Supply Trips: Trips made by light- and heavy-duty trucks for routine maintenance, delivery of supplies, and removal of materials.

These existing operational trips contribute to the total VMT on the regional and local roadway network. The permanent elimination of these trips is a central element of the impact analysis that follows.

5.17.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

T-4 Result in inadequate emergency access.

With respect to consistency with CEQA Guidelines Section 15064.3, subdivision (b), the County's Transportation Impact Analysis Guidelines provides a significance threshold for VMT impacts for land use projects and plans of 16.8 percent reduction from Baseline VMT.

5.17.3 Environmental Impacts

5.1.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR evaluated the transportation implications of decarbonizing the energy supply and concluded that the implementation of the CAP would result in a net reduction in regional Vehicle Miles Traveled (VMT), and that temporary construction/decommissioning traffic would be managed through standard traffic control plans, resulting in less than significant impacts (CAP PEIR, Chapter 3.17). This analysis strictly evaluates the Project's direct VMT and circulation implications to ensure consistency with the CAP PEIR's findings that the phase-out of fossil fuels creates a beneficial transportation impact. Because any temporary decommissioning activities are strictly governed by the Project's enforceable Project Design Features (PDFs) and mandate compliance with existing local, state, and federal traffic and safety regulations (including standard Traffic Control Plans), this analysis focuses on demonstrating how these existing frameworks ensure transportation impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

This analysis evaluates potential transportation impacts based on the legal framework established by Senate Bill 743 (SB 743) and the specific procedures outlined in the Los Angeles County

Transportation Impact Analysis Guidelines. Consistent with these requirements, this analysis uses Vehicle Miles Traveled (VMT) as the primary metric to evaluate transportation impacts. The evaluation considers the Project's direct effects on the transportation network and its consistency with local and regional plans aimed at reducing VMT.

As the Project is a regulatory action and not a land use development project that would generate new permanent trips, a quantitative VMT modeling study is not applicable or required. Instead, the analysis is qualitative and based on the nature, scale, and duration of the reasonably foreseeable physical activities associated with the Project.

Vehicle Miles Traveled (VMT) Analysis

CEQA Guidelines Section 15064.3(a) defines VMT as "the amount and distance of automobile travel attributable to a project." This analysis evaluates the Project's net change in VMT by considering two distinct phases:

- Long-Term Operational VMT: The analysis qualitatively evaluates the permanent reduction in VMT that will result from the cessation of all ongoing operational and maintenance trips currently serving oil and gas sites. This represents a long-term, permanent change to the VMT baseline.
- Short-Term Decommissioning VMT: The analysis qualitatively evaluates the temporary increase in VMT that will occur during the decommissioning phase. This VMT will be generated by two primary sources: 1) construction worker commute trips, and 2) heavy-duty haul truck trips required to remove equipment and materials from the sites. This temporary increase is assessed for its potential to exceed the County's established VMT significance threshold.

Per the County's guidelines, a significant VMT impact would occur if the Project results in a net increase in VMT that exceeds the established significance threshold.

Transportation Hazards and Emergency Access

The analysis of potential impacts related to transportation hazards (Threshold T-3) and emergency access (Threshold T-4) is qualitative. It is based on a review of the types of activities involved in decommissioning (e.g., use of heavy equipment, truck traffic) and considers them in the context of the existing roadway network. The analysis considers whether these temporary activities would introduce new, permanent geometric hazards or create substantial, long-term impediments to emergency access. All activities are evaluated in the context of mandatory compliance with federal, state, and local traffic safety regulations.

5.17.3.2 Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code and the General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Under the Project, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Transportation-related project characteristics include:

- Elimination of Future Operational VMT: The prohibition on new oil wells and production facilities prevents the generation of any future, permanent VMT that would be associated with the operation of new industrial sites.
- Permanent Reduction of Existing Operational VMT (PDF-LU-1 and PDF-LU-2): The mandatory phase-out and decommissioning of existing oil and gas sites will permanently eliminate all daily vehicle trips currently associated with their operation and maintenance.
- Temporary Generation of Decommissioning VMT: The Project's primary physical action is the decommissioning and restoration of well sites. This will result in a temporary, short-term increase in VMT. This VMT will be generated by two primary sources: 1) commute trips for the temporary workforce, and 2) trips by heavy-duty haul trucks required to transport equipment, remove materials, and deliver supplies to the sites.
- No Changes to Transportation Infrastructure: The Project is a regulatory action and does not include the construction or alteration of any public roadways. It does not introduce any new geometric design features or create permanent incompatible uses on the transportation network. All project-related traffic will utilize the existing roadway system.

Overall, the Project's primary transportation characteristics are a temporary, short-term increase in VMT from decommissioning activities, followed by a permanent, long-term reduction in VMT from the cessation of all oil and gas operations. The Project will not alter the physical roadway network.

Subsequent sections provide an evaluation of the Project's impacts relative to each of the CEQA significance thresholds for transportation, considering both the temporary and permanent changes to the transportation system.

5.17.3.3 Impact Analysis

This section evaluates the potential for the Project to result in significant transportation impacts, based on the thresholds of significance identified in Section 5.17.2. The analysis is framed by the requirements of Senate Bill 743 (SB 743), which establishes Vehicle Miles Traveled (VMT) as the primary metric for evaluating transportation impacts under CEQA. The analysis also considers potential impacts related to transportation hazards and emergency access.

The Project is expected to result in two primary and opposing effects on VMT:

- A short-term, temporary increase in VMT during the decommissioning of existing facilities. This increase will be generated by construction worker commute trips and, more significantly, by heavy-duty haul trucks required to remove equipment and materials from individual sites.
- A long-term, permanent reduction in VMT. This will result from the complete elimination of all daily operational vehicle trips currently associated with the ongoing operation and maintenance of the existing oil and gas facilities.

This section evaluates the net effect of these actions. The analysis uses a qualitative approach, consistent with a programmatic EIR for a regulatory action, to determine if the temporary increase in VMT would be significant or if the Project would conflict with applicable transportation plans and policies.

Impact 5.17-1: Would the proposed Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? [Threshold T-1]

Less Than Significant Impact.

The Project would not conflict with any applicable program, plan, ordinance, or policy addressing the circulation system. The Project's long-term transportation outcomes are consistent with and supportive of the primary goals of all applicable regional and local transportation plans, which are focused on reducing Vehicle Miles Traveled (VMT) and improving safety. The Project's temporary, short-term impacts would be managed in accordance with the policies contained within these same plans.

Long-Term Consistency with Transportation Plans

The primary long-term effect of the Project is a net reduction in VMT resulting from the permanent elimination of all daily operational vehicle trips (worker commutes, maintenance trucks, supply deliveries) associated with oil and gas sites. This outcome is highly consistent with the foundational goals of the regional and local transportation framework:

- SCAG's Connect SoCal Plan: The net reduction in VMT directly supports the primary goal of the regional plan to reduce GHG emissions and improve air quality.
- County General Plan & OurCounty Sustainability Plan: The VMT reduction directly implements the policies of the General Plan, including the Mobility Element (e.g., Policy M 4.16), Vision Zero Action Plan, Step by Step Pedestrian Plan, and Bicycle Master Plan, and the core strategy of the OurCounty Sustainability Plan (Strategy 8A).

Short-Term Consistency During Decommissioning

The temporary increase in haul truck traffic during decommissioning could potentially conflict with policies aimed at protecting residential areas and sensitive road users if not properly managed. However, this potential conflict is reduced to a less-than-significant level through mandatory compliance with the existing regulatory framework.

The General Plan's Mobility Element itself provides policies for the safe and efficient movement of goods (Goal M 6), including the use of designated truck routes to minimize impacts on residential neighborhoods (Policy M 6.3). All haul truck operations must also comply with federal (FMCSA) and state (California Vehicle Code) safety regulations. Any necessary traffic control plans would be required as part of the permitting process for decommissioning activities to ensure safe and efficient circulation.

Consistent with the programmatic findings of the CAP PEIR, because the Project's long-term impact is a permanent VMT reduction and its temporary, short-term VMT increase is not considered substantial due to its temporary and dispersed nature, the Project is consistent with the intent of CEQA Guidelines § 15064.3. Therefore, the impact is less than significant.

Impact 5.17-2: Would the proposed Project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)? [Threshold T-2]

Less Than Significant Impact.

The Project would not conflict with or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). This guideline requires an analysis of a project's Vehicle Miles Traveled (VMT), with a significant impact occurring if a project causes a substantial increase in VMT. The Project's long-term effect is a permanent reduction in VMT, and its temporary, short-term increase in VMT during decommissioning is not considered substantial.

Long-Term VMT Impacts (Operation)

The Project's permanent, long-term effect is a net reduction in VMT. By requiring the phase-out and decommissioning of existing oil and gas sites, the Project will permanently eliminate all daily vehicle trips currently associated with their ongoing operation. This includes worker commute trips, routine maintenance visits, and supply truck deliveries. A reduction in VMT is, by definition, not a significant adverse impact under CEQA Guidelines § 15064.3.

Short-Term VMT Impacts (Decommissioning)

During the temporary decommissioning phase, there will be a short-term increase in VMT. This increase will be generated by construction workers commuting to the individual sites and, more significantly, by heavy-duty haul trucks required to remove equipment, scrap metal, and other materials.

However, this temporary increase in VMT is not considered substantial for the following reasons:

- It is temporary and not permanent. The VMT will only be generated for the limited duration of work at each site.
- It is geographically dispersed. The decommissioning activities will occur at distinct sites located across the County's unincorporated areas, meaning the temporary VMT increase will not be concentrated in a single location.
- It is phased over a long period. The decommissioning will take place over a 20-year amortization period, further distributing the temporary VMT impacts over time.

Because the Project's long-term impact is a permanent VMT reduction and its temporary, short-term VMT increase is not considered substantial due to its temporary and dispersed nature, the Project is consistent with the intent of CEQA Guidelines § 15064.3. Therefore, the impact is less than significant.

Impact 5.17-3: Would the proposed Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? [Threshold T-3]

Less Than Significant Impact.

The Project would not substantially increase hazards due to a geometric design feature or incompatible uses. The Project does not create any new roadway features, its long-term effect is a beneficial reduction in

incompatible industrial traffic, and its temporary, short-term use of haul trucks will be managed through compliance with existing federal, state, and local safety regulations and planning policies.

Hazards from Geometric Design Features

A significant impact would occur if the Project were to construct or alter a roadway in a manner that creates a new hazard, such as a sharp curve or a dangerous intersection. The Project is a regulatory action that does not involve the construction or physical alteration of any public roadways. Therefore, the Project would create no impact due to a geometric design feature.

Hazards from Incompatible Uses

An incompatible use hazard could occur if the Project introduced a new type of vehicle or traffic that conflicts with existing uses on a roadway, increasing the risk of accidents.

- Long-Term Impacts: The Project's long-term effect on the transportation network is beneficial. By requiring the phase-out of oil and gas sites, the Project will permanently remove the daily and intermittent industrial truck traffic associated with routine operations and maintenance from local streets. This action removes an existing incompatible use from the roadway network, particularly in residential communities, which is a positive safety impact consistent with the goals of the County's Vision Zero Plan.
- Short-Term Impacts: During the temporary decommissioning phase, the Project will introduce heavy-duty haul trucks onto the roadway network to remove equipment and materials. This represents a potential temporary incompatible use that could increase hazards if not properly managed. However, this impact is considered less than significant because this temporary traffic will be required to comply with a multi-layered regulatory framework designed to ensure public safety:
    - Federal and State Safety Regulations: All haul truck operators and vehicles must adhere to the comprehensive safety standards of the Federal Motor Carrier Safety Administration (FMCSA) and the California Vehicle Code, which govern driver qualifications, vehicle maintenance, and safe operation.
    - Local Planning Policies: The General Plan Mobility Element (Goal M 6) requires that goods movement be managed to minimize impacts on sensitive land uses, including the use of designated truck routes.
    - Permitting and Traffic Control: As a standard condition of the County permits required for decommissioning work, operators would be required to submit a Haul Route Program or Traffic Control Plan for review and approval by Public Works. This ensures that truck routes are safe, that appropriate signage and flaggers are used when necessary, and that conflicts with sensitive uses like schools are minimized.

Consistent with the programmatic findings of the CAP PEIR, because the Project creates no new geometric hazards, its long-term effect is a beneficial reduction in incompatible industrial traffic, and its temporary haul truck traffic will be managed through compliance with existing federal, state, and local regulations, the Project would not substantially increase transportation hazards. Therefore, the impact is less than significant.

Impact 5.17-4: Would the proposed Project result in inadequate emergency access? [Threshold T-4]

Less Than Significant Impact.

The Project would not result in inadequate emergency access. The Project includes no permanent features that would impede emergency vehicles, and any temporary, short-term impacts during decommissioning would be managed through mandatory compliance with existing fire code and traffic control regulations.

A significant impact would occur if a project were to construct permanent barriers or result in temporary activities that would substantially interfere with the ability of emergency responders (e.g., fire trucks, ambulances, police cars) to access the project site or surrounding areas.

- Long-Term Impacts: The Project's long-term effect is beneficial. By permanently removing industrial facilities, the Project eliminates the potential for a major industrial incident that could itself require and potentially impede a large-scale emergency response. The restoration of the sites does not involve the construction of any new, permanent barriers to access.
- Short-Term Impacts: During the temporary decommissioning phase, the movement of heavy equipment and haul trucks on public roadways could potentially create temporary and intermittent interference with emergency vehicle access if not properly managed. However, this potential impact is considered less than significant because all decommissioning activities will be required to comply with a multi-layered regulatory framework designed to ensure emergency access is maintained:
    - California and County Fire Codes: The California Fire Code and the Los Angeles County Fire Code (Title 32) include mandatory, enforceable requirements for maintaining clear and unobstructed access for fire and emergency apparatus at all times around construction and industrial sites.
    - Traffic Control Plans: As a standard condition of the County permits required for decommissioning work, operators will be required to prepare and implement a Traffic Control Plan for review and approval by Public Works. This plan must detail the measures to be used (e.g., flag persons, temporary signage, work-staging plans) to ensure that adequate access for emergency vehicles is preserved on all affected roadways.

Consistent with the programmatic findings of the CAP PEIR, because the Project includes no permanent barriers to access and all temporary activities will be required to comply with mandatory Fire Code and County permitting requirements (Traffic Control Plans) for maintaining emergency access, the Project would not result in inadequate emergency access. Therefore, the impact is less than significant.

5.17.4 Cumulative Impacts

A significant cumulative impact on transportation would occur if the Project's impacts, when combined with the impacts of other past, present, and reasonably foreseeable future projects, would result in a cumulatively considerable conflict with transportation plans, a substantial increase in regional VMT, or a significant increase in transportation hazards. The geographic scope for this analysis is the Los Angeles County region, which is guided by the regional transportation plan developed by the Southern California Association of Governments (SCAG).

The cumulative context for the region is one of planned and continued growth, as forecasted by SCAG's Connect SoCal 2024–2050 plan. This anticipated residential, commercial, and industrial development across the County will incrementally increase the number of vehicle trips on the regional transportation network, contributing to an overall increase in regional VMT. This cumulative growth and its associated

transportation impacts are managed through a comprehensive framework of regional and local plans designed to promote a multimodal transportation system and reduce per-capita VMT.

The Project's incremental contribution to cumulative transportation impacts is not considered cumulatively considerable. The analysis below evaluates the Project's contribution in the context of the overall cumulative condition.

- VMT and Plan Consistency: The primary cumulative transportation impact in the region is the overall increase in VMT from new development. While regional plans aim to manage this growth, the total VMT is projected to increase. The Project's incremental contribution, however, is not adverse. The short-term VMT increase from decommissioning activities is temporary, minor in volume, geographically dispersed across 248 sites, and phased over a 20-year period; therefore, its contribution to the regional VMT increase is negligible and not cumulatively considerable. Critically, the Project's long-term contribution is a permanent, net reduction in VMT from the elimination of all operational trips. This represents a beneficial contribution that runs counter to the adverse cumulative trend and supports the VMT reduction goals of regional and local plans.
- Transportation Hazards and Emergency Access: Cumulative growth will increase traffic volumes on the roadway network, which could incrementally increase the potential for traffic hazards. However, the Project's long-term effect is a beneficial reduction in transportation hazards by permanently removing incompatible industrial truck traffic from local streets. The temporary increase in haul trucks during decommissioning will be managed on a site-by-site basis through mandatory compliance with federal, state, and local safety regulations and the implementation of traffic control plans, ensuring its contribution to cumulative hazards is not considerable. Similarly, because all temporary activities must maintain emergency access in accordance with the County Fire Code, the Project would not contribute to any cumulative impact on emergency access.

Because the Project's long-term transportation impacts are beneficial (a net reduction in VMT and incompatible uses) and its temporary, short-term impacts are minor and managed through existing regulations, its incremental effect is not cumulatively considerable. Therefore, the cumulative impact on transportation is less than significant.

5.17.5 Level of Significance Before Mitigation

Based on the analysis presented, all potential impacts related to transportation are determined to be less than significant.

The Project would have a less than significant impact with respect to conflicts with transportation plans and VMT (Thresholds T-1 and T-2). The temporary increase in VMT during decommissioning is minor and geographically dispersed, while the long-term effect of the Project is a beneficial net reduction in VMT.

The Project would also have a less than significant impact with respect to transportation hazards and emergency access (Thresholds T-3 and T-4). The Project creates no new geometric hazards, and temporary impacts from haul trucks will be managed through mandatory compliance with existing federal, state, and local safety regulations and traffic control planning.

The Project's contribution to cumulative transportation impacts was also found to be less than significant. Because all project-level and cumulative impacts are less than significant, no mitigation measures are required.

5.17.6 Mitigation Measures

No mitigation measures are required.

The analysis in this section concluded that the Project would not result in any significant adverse impacts related to transportation. All Project-level and cumulative impacts were determined to be less than significant. This finding is based on the Project's built-in mandates (PDF-LU-1 and PDF-LU-2), which ensure a beneficial long-term effect (a net reduction in VMT), as well as mandatory compliance with the existing regulatory framework for managing temporary traffic and safety during decommissioning. Therefore, no mitigation measures are required.

5.17.7 Level of Significance After Mitigation

No significant impacts were identified.

The analysis in this section concluded that the Project would not result in any significant adverse impacts related to transportation. All Project-level and cumulative impacts were determined to be less than significant. This finding is based on the Project's built-in mandates (PDF-LU-1 and PDF-LU-2), which ensure a beneficial long-term effect (a net reduction in VMT), as well as mandatory compliance with the existing regulatory framework for managing temporary traffic and safety during decommissioning. Because the Project does not result in significant impacts to transportation, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.17.8 References

Federal

U.S. Department of Transportation (DOT), Federal Highway Administration (FHWA). Manual on Uniform Traffic Control Devices (MUTCD).

U.S. Department of Transportation (DOT), Federal Motor Carrier Safety Administration (FMCSA). Federal Motor Carrier Safety Regulations. 49 C.F.R.

State of California

California Department of Transportation (Caltrans). 2020. Transportation Impact Study Guide.

California Governor's Office of Planning and Research (OPR). 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA.

California Public Resources Code, Section 21099 (SB 743).

CEQA Guidelines, California Code of Regulations, Title 14, Section 15064.3.

Regional

Southern California Association of Governments (SCAG). 2024. Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. Los Angeles, CA.

Los Angeles County Metropolitan Transportation Authority (Metro). 2020. 2020 Long Range Transportation Plan.

Metro. 2016. Active Transportation Strategic Plan.

County of Los Angeles

County of Los Angeles. 2015. Los Angeles County General Plan 2035. (Including the Mobility Element, Step by Step Los Angeles County, and Los Angeles County Bicycle Master Plan).

County of Los Angeles. 2025. OurCounty: The Los Angeles County Sustainability Plan.

County of Los Angeles. 2019. Vision Zero: A Plan for Safer Roadways 2020–2025.

County of Los Angeles, Public Works. 2020. Transportation Impact Analysis Guidelines.

County of Los Angeles, Department of Regional Planning. 2025. Revised Oil Well Ordinance Initial Study.

Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

CHAPTER 5.18 TRIBAL CULTURAL RESOURCES

This section of the Environmental Impact Report (EIR) identifies and evaluates the potential for the Project—the establishment of a regulatory framework to prohibit new oil and gas production and phase out existing operations—to cause a substantial adverse change to Tribal Cultural Resources (TCRs). The analysis herein is prepared in accordance with the California Environmental Quality Act (CEQA), as amended by Assembly Bill 52 (AB 52) of 2014. AB 52 established TCRs as a distinct resource category under CEQA, separate from archaeological resources, and created a formal government-to-government consultation process between public agencies and California Native American Tribes. This analysis is also guided by the principles of Senate Bill 18 (SB 18), which requires local governments to consult with Tribes regarding the protection of traditional tribal cultural places.

As defined in Public Resources Code (PRC) Section 21074, Tribal Cultural Resources include:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources.
2. A resource determined by the Lead Agency (in this case, the County of Los Angeles), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria, the Lead Agency shall consider the significance of the resource to a California Native American Tribe.

This section describes the physical environmental and regulatory setting for TCRs, outlines the formal consultation process the County has undertaken with traditionally and culturally affiliated Tribes, identifies the criteria and thresholds used to evaluate the significance of potential impacts, describes the methods used in evaluating these impacts, and provides the results of the impact assessment.

The analysis is informed by the government-to-government consultation process mandated by AB 52, which is designed to identify resources that may be impacted by the Proposed Project. As summarized in Table 2-1 (Summary of Scoping Comments Received), the Native American Heritage Commission (NAHC) submitted a comment letter during the scoping period that provided guidance on the legal requirements for consulting with Native American Tribes to identify and protect TCRs. The NAHC emphasized the importance of early consultation to avoid impacts to these important resources.

Potential impacts to TCRs could occur during Project-related activities that involve ground disturbance. For the purposes of this DEIR, this primarily includes activities associated with the required decommissioning and remediation of existing oil and gas facilities, which involve the

plugging and abandonment of wells, remediation of site contamination, and final restoration of the sites.

5.18.1 Environmental Setting

5.18.1.1 Regulatory Setting

Federal Regulations

Federal laws, regulations, and executive orders (EOs) pertaining to Native American resources are summarized below. These regulations primarily apply to "federal undertakings" (actions involving federal funding, permits, or land) or to discoveries on federal and tribal lands.

The Project is a regulatory framework (a County ordinance, General Plan Amendment, and Specific Plan Amendment) enacted under local land use authority and does not constitute a federal undertaking, nor does it apply to federal lands. Therefore, these federal regulations are not directly triggered by the adoption of the Project.

However, they are included in this EIR for context and to provide a comprehensive regulatory overview. It is possible that future, project-specific decommissioning activities carried out by oil and gas operators to comply with the Project could require a federal permit (e.g., a Clean Water Act Section 404 permit from the U.S. Army Corps of Engineers). In such cases, the responsible federal agency would be required to conduct its own compliance review for the federal action, which would include, but not be limited to, consultation under Section 106 of the National Historic Preservation Act.

National Historic Preservation Act (NHPA) Section 106

Section 106 of the NHPA (54 U.S.C. § 306108) requires federal agencies to consider the effects of their undertakings on historic properties. Historic properties are resources listed in or eligible for listing in the National Register of Historic Places (NRHP). The process requires the federal agency to identify and evaluate historic properties, assess the effects of the undertaking on those properties, and consult with the State Historic Preservation Officer (SHPO) and other interested parties, including Native American Tribes, to avoid, minimize, or mitigate adverse effects. As discussed in Section 3.6, Cultural Resources, this consultation process is distinct from the government-to-government consultation required by CEQA (AB 52).

Native American Graves Protection and Repatriation Act (NAGPRA)

The Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. § 3001–3013) addresses the treatment of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. It applies to such items uncovered on federal and tribal lands. NAGPRA establishes procedures for inadvertent discoveries on these lands and for the intentional

excavation and removal of such items. It also requires federal agencies and federally funded museums to inventory their collections and repatriate specified items to culturally affiliated Tribes.

American Indian Religious Freedom Act of 1978 (AIRFA)

The American Indian Religious Freedom Act (42 U.S.C. § 1996) establishes the policy of the United States to protect and preserve the inherent right of American Indians, Eskimos, Aleuts, and Native Hawaiians to believe, express, and exercise their traditional religions. These rights include access to sites, use and possession of sacred objects, and the freedom to worship through ceremony and traditional rites. This law provides a framework and guidance for federal agencies but does not create a specific compliance process.

Executive Order 13007: Indian Sacred Sites

Issued on May 24, 1996, this EO directs federal agencies with statutory or administrative responsibility for the management of federal lands to: (1) accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners; and (2) avoid adversely affecting the physical integrity of such sacred sites to the extent practicable and permitted by law. It also requires federal agencies to develop procedures for reasonable notification of proposed actions or land management policies that may restrict access to or ceremonial use of, or adversely affect, sacred sites.

Executive Order 13175: Consultation and Coordination with Indian Tribal Governments

Issued on November 6, 2000, this EO directs federal agencies to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications. It seeks to strengthen the government-to-government relationships between the United States and Indian Tribes and has been reaffirmed by subsequent presidential memoranda in 2004, 2009, and 2021.

Summary of Federal Tribal Cultural Considerations

The federal laws, regulations, and executive orders summarized above establish the primary framework for the protection of Native American resources and the requirement for government-to-government consultation for federal actions. These regulations, including the National Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act (NAGPRA), apply to projects that are defined as "federal undertakings"—those that are carried out, funded, or permitted by a federal agency—or to discoveries made on federal or tribal lands.

The Project, which is the adoption of a regulatory framework to prohibit new oil and gas production and phase out existing operations, is an action led by the County of Los Angeles under the authority of the State of California. The adoption of this Project does not involve federal land, funding, or permits. Therefore, the Project itself is not a federal undertaking, and the compliance and

consultation processes defined by NHPA Section 106 and NAGPRA are not triggered by this action.

These federal regulations are presented for a comprehensive regulatory overview and to acknowledge that future, site-specific decommissioning activities undertaken by private operators to comply with the County's ordinance could potentially require permits from a federal agency (e.g., a U.S. Army Corps of Engineers Section 404 permit for work in jurisdictional waters). In such a scenario, that federal agency would be separately and independently responsible for conducting its own compliance review, including any required NHPA Section 106 consultation, for its specific permit action.

This EIR's analysis of impacts to Tribal Cultural Resources is therefore governed by the applicable State laws, specifically the California Environmental Quality Act (CEQA) and Assembly Bill 52 (AB 52), which are discussed in the following section.

State Regulations

While the federal regulations discussed previously provide a broad context for the protection of Native American cultural resources, the primary, legally mandated framework for this Project's analysis and the specific consultation requirements for the County of Los Angeles as the Lead Agency are governed by State law. The California Environmental Quality Act (CEQA) provides the foundation for this analysis, which has been significantly shaped by legislation focused on Tribal Cultural Resources and government-to-government consultation. The most important of these statutes, which directly guide the analysis in this EIR, are Assembly Bill 52 and Senate Bill 18, discussed below.

Assembly Bill 52

Assembly Bill (AB) 52, enacted in 2014, is the primary California law governing the analysis of Tribal Cultural Resources (TCRs) for this Project. AB 52 establishes a formal, government-to-government consultation process within CEQA, requiring the Lead Agency (the County of Los Angeles) to engage with California Native American Tribes to identify and, if feasible, avoid or mitigate significant impacts to TCRs. This process is distinct from the consultation required by the National Historic Preservation Act (NHPA) Section 106 and Senate Bill 18 (SB 18).

AB 52 (codified in Public Resources Code [PRC] Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.2, and 21084.3) requires the following procedural steps:

1. Formal Notification: Within 14 days of a decision to undertake a project, the Lead Agency must provide formal, written notification to the designated contact of any California Native American Tribe traditionally and culturally affiliated with the Project's geographic area that has previously requested, in writing, to be informed of County projects (PRC Section 21080.3.1[b]).
2. Tribal Response: Tribes have 30 days from the receipt of the Lead Agency’s notification to request consultation in writing (PRC Section 21080.3.1[d]).

3. Consultation: If a Tribe requests consultation, the Lead Agency must begin the consultation process within 30 days of receiving the request (PRC Section 21080.3.1[e]).
4. Consultation Topics: PRC Section 21080.3.2(a) specifies that consultation may include discussions on the type of environmental review necessary, the significance of identified TCRs, and the significance of the Project's impacts on those TCRs. Consultation must also include any topics requested by the Tribe, such as Project alternatives, recommended mitigation measures, and measures to avoid or lessen significant impacts.

Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant impact on a TCR, if such an impact exists; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]).

Senate Bill 18

SB 18 (Statutes of 2004, Chapter 905; codified in Government Code Sections 65352.3, 65352.4, and 65562.5) requires local governments (cities and counties) to consult with California Native American Tribes before adopting or amending a general plan or specific plan. The intent is to provide Tribes an opportunity to participate in local land use decisions at an early planning stage for the purpose of protecting, or mitigating impacts to, cultural places.

As the Proposed Project involves changes to the County's land use policies and regulatory framework, which constitutes a General Plan-level action, the provisions of SB 18 apply. SB 18 requires the following:

- Prior to adopting or amending a general plan, the local government must notify the appropriate Tribes (identified on the Native American Heritage Commission [NAHC] contact list) of the opportunity to conduct consultations. Tribes have 90 days from receiving this notification to request consultation.
- The local government must also refer the proposed action (e.g., draft General Plan Amendment) to the identified Tribes, allowing a 45-day comment period, regardless of whether prior consultation has occurred.

Confidentiality of Tribal Cultural Resources

Provisions of the California Government Code protect the confidentiality of archaeological sites and TCRs to prevent unauthorized excavation, looting, or vandalism. Government Code Section 6254(r) protects information related to "Native American graves, cemeteries, and sacred places" maintained by the NAHC. Furthermore, Government Code Section 6254.10 explicitly exempts from public disclosure "records that relate to archaeological site information and reports," including those obtained by a local agency through the AB 52 consultation process. Accordingly, the specific locations and cultural details of TCRs identified during consultation are not disclosed in this public EIR.

California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98

California law provides specific, non-discretionary procedures to be followed upon the inadvertent discovery of human remains.

- Health and Safety Code Section 7050.5(b) states that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has examined the remains.
- Public Resources Code Section 5097.98 outlines the process if the coroner determines the remains are Native American. The coroner must contact the NAHC within 24 hours. The NAHC will then notify the "most likely descendant" (MLD) of the deceased. The MLD is given 48 hours, with the permission of the landowner, to inspect the discovery site and recommend means of treating or disposing of the human remains and associated grave goods with appropriate dignity.

Summary of State Tribal Cultural Considerations

State law provides the primary and most direct legal framework for the analysis of Tribal Cultural Resources (TCRs) and the procedures for Native American consultation for this Project. The analysis in this EIR is conducted pursuant to the California Environmental Quality Act (CEQA) and, most specifically, the requirements established by Assembly Bill 52 (AB 52).

In accordance with AB 52, the County of Los Angeles has engaged in a formal, government-to-government consultation process with California Native American Tribes that are traditionally and culturally affiliated with the Project Area. The purpose of this consultation is to identify TCRs that may be affected by the Project—including by future ground-disturbing activities associated with the decommissioning, remediation, and restoration of oil and gas sites—and to develop mitigation measures to avoid or lessen any identified significant impacts. The findings of that consultation process form the basis for the impact analysis in this section.

Furthermore, state law provides non-discretionary procedures (under Public Resources Code Section 5097.98 and Health and Safety Code Section 7050.5) for the treatment of any inadvertent discovery of Native American human remains, which must be followed by all parties. State confidentiality laws (California Government Code Sections 6254(r) and 6254.10) ensure that the specific locations and sensitive details of TCRs identified by Tribes during consultation are protected from public disclosure.

Local Regulations

The County of Los Angeles's actions regarding land use and environmental review are guided by a local regulatory framework that functions in concert with the federal and state requirements previously discussed. This local framework includes the County's General Plan, which establishes the foundational goals and policies for resource protection, as well as specific ordinances that implement those policies.

County of Los Angeles General Plan

The General Plan, particularly the Conservation and Natural Resources Element, establishes the foundational goals and policies for the protection of all cultural resources within the unincorporated areas, including those of importance to Native American Tribes. These policies provide the local framework that supports the implementation of state-mandated consultation and protection procedures. The Project is consistent with, and helps implement, these goals.

Relevant goals and policies include:

- Goal C/NR 14: Protected historic, cultural, and paleontological resources.
    - Policy C/NR 14.1: Mitigate all impacts from new development on or adjacent to historic, cultural, and paleontological resources to the greatest extent feasible.
    - Policy C/NR 14.2: Support an inter-jurisdictional collaborative system that protects and enhances historic, cultural, and paleontological resources.
    - Policy C/NR 14.3: Support the preservation and rehabilitation of historic buildings.
    - Policy C/NR 14.4: Ensure proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004).
    - Policy C/NR 14.5: Promote public awareness of historic, cultural, and paleontological resources.
    - Policy C/NR 14.6: Ensure proper notification and recovery processes are carried out for development on or near historic, cultural, and paleontological resources.

Los Angeles County Historic Preservation Ordinance

The County's Historic Preservation Ordinance (Los Angeles County Code, Chapter 22.124), as summarized in Section 5.5.1.1, Cultural Resources: Regulatory Setting establishes the County's official register of historic landmarks and provides a framework for the designation and protection of such resources. While the ordinance does not contain separate provisions for Tribal Cultural Resources as defined under AB 52, it provides a mechanism for listing significant local resources. Any sites, features, cultural landscapes, sacred places, or objects with cultural value to a California Native American Tribe that are listed, or determined eligible for listing, on this local registry would meet the definition of a Tribal Cultural Resource under Public Resources Code Section 21074(a)(1).

Summary of Local Tribal Cultural Considerations

The County of Los Angeles's local regulations, anchored by the General Plan, operate in conjunction with the state-level mandates of CEQA, AB 52, and SB 18. The General Plan provides the foundational policy direction for the County, as Lead Agency, to protect cultural resources and engage with Native American Tribes.

Specifically, General Plan policies (such as C/NR 14.1, 14.4, and 14.6) direct the County to mitigate impacts to cultural resources, ensure proper notification to Tribes, and implement recovery processes for resource discoveries. The Proposed Project, by establishing a regulatory framework that includes decommissioning and site restoration, aligns with these policies.

While the General Plan and Historic Preservation Ordinance establish the broad policy framework for resource protection, the specific, project-level procedures for identifying, evaluating, and mitigating impacts to Tribal Cultural Resources are primarily implemented through the CEQA process, as directed by AB 52. The County's General Plan policies provide the local policy basis for implementing the mitigation measures identified in this EIR and ensuring long-term compliance with state law.

5.18.1.2 Existing Conditions

This section describes the environmental setting for Tribal Cultural Resources. This setting is informed by two primary sources: (1) the general ethnographic and historical context of the Los Angeles County region, which is available in public records and summarized in Section 5.5, Cultural Resources; and (2) the specific results of the government-to-government consultation undertaken with California Native American Tribes for this Project, as required by Assembly Bill 52 (AB 52).

Cultural Setting

A comprehensive overview of the regional ethnographic, prehistoric, and historical setting for Los Angeles County is provided in Section 5.5.1.2, Existing Conditions, in Section 5.5, Cultural Resources. That section includes a discussion of the pre-contact, ethnohistoric, and historic periods and identifies the primary Native American groups with traditional and cultural affiliations to the unincorporated areas of the County, including but not limited to the Gabrielino-Tongva, Fernandeño-Tataviam, and Chumash.

While that section provides the general academic and historical context, the "cultural setting" for the purposes of this chapter is more specifically defined by the cultural values and traditional affiliations identified by the consulting Tribes. Through the formal AB 52 consultation process (detailed in Section 5.18.2, Methodology), participating Tribes provide specific information regarding the cultural significance of the Project Area, which may include known or potential locations of sacred sites, gathering areas for traditional materials, cultural landscapes, and other resources that are not part of the public archaeological record.

Cultural Resources

As defined by Public Resources Code Section 21074, Tribal Cultural Resources (TCRs) are a distinct category of resources, separate from the "historical resources" and "unique archaeological resources" analyzed in Section 5.5, Cultural Resources. While there can be overlap—a recorded archaeological site may also be a TCR—TCRs are ultimately defined by their cultural value and significance to a Tribe.

Therefore, the inventory of "existing conditions" for TCRs is based on the results of the AB 52 consultation process. This process includes a review of the Sacred Lands File (SLF) by the Native American Heritage Commission (NAHC) and direct correspondence and consultation with

affiliated Tribes to identify known and potential TCRs that could be affected by ground-disturbing activities associated with the Project (i.e., the decommissioning, remediation, and final restoration of oil and gas sites).

Confidentiality of Tribal Cultural Resources

In accordance with California Government Code Sections 6254(r) and 6254.10, and to protect these sensitive resources from vandalism, looting, or desecration, the specific locations, nature, and details of TCRs identified by Tribes during consultation are confidential. This information is maintained in a confidential record by the County of Los Angeles and is not disclosed in this EIR. The impact analysis presented in this chapter is based on the presence of these identified confidential resources within the Project Area, and potential mitigation measures have been developed in direct consultation with the participating Tribes to ensure their protection.

5.18.2 Consultation Process

The methodology used to identify Tribal Cultural Resources (TCRs) and analyze potential Project impacts is centered on the government-to-government consultation process mandated by Public Resources Code (PRC) Section 21080.3.1 (Assembly Bill 52). This process is the primary mechanism for identifying resources that may not be recorded in existing archaeological or historical databases but are known to affiliated Tribes as significant sites, features, places, cultural landscapes, sacred places, or objects with cultural value.

This consultation was augmented by outreach conducted pursuant to Senate Bill 18 (SB 18), as the Project includes a General Plan Amendment.

5.18.2.1 Native American Consultation & NAHC List Request

Given the programmatic, countywide nature of the Proposed Project, the County of Los Angeles determined that the unincorporated areas are culturally sensitive and proceeded directly with formal, government-to-government consultation as the primary means of identifying Tribal Cultural Resources (TCRs). This approach acknowledges the extensive, documented history of Native American occupation throughout the Los Angeles region. A search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was not conducted; rather, the County presumed that such resources exist and that consultation was the appropriate mechanism to identify them.

To facilitate this consultation, the County requested and received contact lists from the NAHC for all California Native American Tribes that are traditionally and culturally affiliated with the Project Area. This included the list required for notification under Public Resources Code Section 21080.3.1 (AB 52) and the list required for Government Code Section 65352.3 (SB 18). The SB 18 list was provided on or about April 14, 2025.

5.18.2.2 Assembly Bill 52 (AB 52) Consultation

In accordance with PRC Section 21080.3.1, the County of Los Angeles initiated formal AB 52 consultation on March 27, 2025. Formal notification letters were sent via mail and email to the designated contacts for all California Native American Tribes that have previously requested notification from the County.

The letters provided a detailed Project Description, a countywide location, and identified the Lead Agency contact (Kenneth Warner, Department of Regional Planning), in accordance with PRC §21080.3.1(d). The letters informed the Tribes of their 30-day period, upon receipt, to request formal consultation in writing.

The following Tribes were formally notified as part of this process:

1. Gabrieleno Tongva, San Gabriel Band of Mission Indians (Attn: Anthony Morales, Chief)
2. The Gabrielino Tongva Indians of California (Attn: Christina Conley, Cultural Resources Administrator)
3. San Manuel Band of Mission Indians (Attn: Alexandra McCleary, Ph.D.)
4. Tejon Indian Tribe
5. Band of Mission Indians (Attn: Patrick Tumamait, Native Chumash Consultant)
6. Fernandeño Tataviam Band of Mission Indians (Attn: Sarah Brunzell, Tribal Historic and Cultural Preservation Officer)
7. Gabrieleno Band of Mission Indians – Kizh Nation (Attn: Andrew Salas, Chairman)

Consultation Results and Status

The 30-day response period concluded in late April 2025. A summary of the consultation efforts and their outcomes is provided below.

Gabrieleno Band of Mission Indians - Kizh Nation (Kizh Nation)

The Kizh Nation responded to the County's notification and requested formal consultation. A consultation meeting was scheduled for May 20, 2025. Prior to the scheduled meeting, on May 20, 2025, the Kizh Nation provided the County with a formal written statement detailing the cultural significance of the Project Area, particularly the Baldwin Hills, and a set of proposed mitigation measures.

The Kizh Nation's formal statement identified their deep traditional and ancestral ties to the Baldwin Hills, describing the area as a "highland passage and ceremonial hub" connecting numerous Kizh villages and serving as a "spiritual vantage point." The correspondence further detailed that the natural oil and tar (bitumen) seeps in the area were a sacred substance used by their ancestors for millennia for waterproofing plank boats (ti’ats), baskets, tools, medicine, and trade.

The Tribe stated that the 20th-century industrial oil extraction in this area constituted a "spiritual desecration" that "destroyed, displaced, or buried unknown numbers of cultural sites and ancestral remains" without their consent.

In their correspondence, the Kizh Nation requested that their specific tribal mitigation measures be formally adopted into the Project's Mitigation Monitoring and Reporting Program (MMRP) to ensure the protection of ancestral objects and human remains that may be uncovered during future decommissioning and site restoration activities. The Tribe further stated that if the County agreed to and incorporated these measures, the formal meeting would no longer be necessary and consultation could be concluded in good faith.

Through good-faith, government-to-government consultation, the County and the Kizh Nation discussed mechanisms to protect these sensitive resources within the County's land use regulatory authority. As a direct result of this consultation, the County agreed to incorporate a mandatory performance standard into the Revised Oil Well Ordinance. This standard, formalized as Project Design Feature PDF-TCR-1 (Cultural Assessment), requires operators to retain a qualified archaeologist to conduct a records search and Phase I pedestrian survey prior to any ground-disturbing activities. Upon mutual agreement that this ordinance requirement establishes a proactive mechanism to identify and protect cultural resources prior to site decommissioning, formal consultation under AB 52 with the Kizh Nation was successfully concluded.

Other Notified Tribes

No written requests for consultation were received from the other Tribes notified under AB 52 (Gabrieleno Tongva, San Gabriel Band of Mission Indians; The Gabrielino Tongva Indians of California; San Manuel Band of Mission Indians; Tejon Indian Tribe; Band of Mission Indians; and Fernandeño Tataviam Band of Mission Indians) within the 30-day response period. As no formal request was received from these Tribes within the statutory timeframe, the formal AB 52 consultation obligation with them is concluded.

5.18.2.3 Senate Bill 18 (SB 18) Consultation

On April 16, 2025, the County sent formal notification letters for the General Plan Amendment component of the Project to the full SB 18 contact list provided by the NAHC. This notification initiated a 90-day response period.

- The Gabrieleno Band of Mission Indians - Kizh Nation responded, and consultation was conducted as described in the AB 52 process above.
- The Quechan Indian Tribe of the Fort Yuma Reservation responded by deferring to the local Tribes and supporting their determinations.
- The Santa Rosa Band of Cahuilla Indians responded by deferring to the Soboba Band of Luiseno Indians cultural resource department.

No other Tribes on the SB 18 list requested consultation within the response period.

5.18.2.4 Consultation Records and Confidentiality

Copies of all correspondence related to the AB 52 and SB 18 consultation process, including the NAHC contact lists, notification letters sent, and all responses received from Tribes, are included in Appendix B, Tribal Cultural Resources.

Pursuant to California Government Code Sections 6254(r) and 6254.10, and as explicitly requested by the Kizh Nation, the specific contents of the consultation correspondence, the provided mitigation measures, and any information regarding the location or nature of tribal cultural resources are confidential and are not subject to public disclosure. This confidential appendix is maintained as part of the administrative record for this Project.

5.18.3 CEQA Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if it would:

- Cause a substantial adverse change in the significance of a Tribal Cultural Resource.

A "substantial adverse change" in the significance of a TCR is defined in Public Resources Code (PRC) Section 21084.3(b) as the physical demolition, destruction, relocation, or alteration of the resource or the alteration of its character or setting, in a manner that would diminish the resource's integrity or convey its significance.

A Tribal Cultural Resource is defined in PRC Section 21074 as either:

1. A site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    a. Listed or eligible for listing in the California Register of Historical Resources (California Register), or in a local register of historic resources (such as the County Historical Landmarks Registry) as defined in PRC Section 5020.1(k); or
2. A resource determined by the Lead Agency (the County of Los Angeles), in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

Based on the criteria above, and informed by the AB 52 consultation process, this EIR determines that the Project would have a significant impact on Tribal Cultural Resources if Project activities—specifically ground disturbance associated with the decommissioning, remediation, and restoration of oil well sites—would:

TCR-1 Cause a substantial adverse change (such as physical destruction, damage, or alteration) to a Tribal Cultural Resource that is listed or eligible for listing in the California Register or a local register.

TCR-2 Cause a substantial adverse change (such as physical destruction, damage, or alteration) to a resource determined by the County, in its discretion and supported by substantial evidence (including information provided during Tribal consultation), to be a significant TCR.

The "substantial evidence" referenced in part (2) of the PRC Section 21074 definition, and which forms the basis of this analysis, is the information provided by the Gabrieleno Band of Mission Indians – Kizh Nation during formal AB 52 consultation (detailed in Section 5.18.2.2). This consultation identified the presence of significant, confidential TCRs in the Project Area, particularly in the Baldwin Hills, that could be impacted by future ground-disturbing activities.

5.18.4 Environmental Impacts

This section evaluates the potential for the Proposed Project to cause a significant impact on Tribal Cultural Resources (TCRs), based on the thresholds of significance identified in Section 5.18.3.

5.18.4.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR acknowledged that while the long-term phase-out of fossil fuels is beneficial, the physical earth-moving activities required to decommission infrastructure could potentially impact unknown Tribal Cultural Resources. The CAP PEIR determined that these impacts could be reduced to a less-than-significant level through site-specific archaeological and tribal assessments (CAP PEIR, Chapter 3.18). Therefore, this analysis evaluates the Project's direct implications for TCRs to ensure consistency with the CAP PEIR's findings. Because any temporary ground-disturbing activities are strictly governed by the Project's enforceable Project Design Features (specifically PDF-TCR-1) and mandate compliance with existing state cultural resource laws, this analysis focuses on demonstrating how these built-in frameworks ensure impacts remain less than significant without the need to incorporate programmatic mitigation measures from the CAP PEIR.

The methodology for this impact analysis is based on a review of the Project Description, the existing environmental setting, and the substantial evidence gathered during the formal government-to-government consultation process detailed in Section 5.18.2, Consultation Process.

The analysis considers whether the physical activities required by the Proposed Project—specifically the future ground-disturbing activities associated with the decommissioning, plugging and abandonment, remediation, and final restoration of existing oil and gas facilities—could cause a "substantial adverse change" to a known TCR.

This assessment involved the following steps:

1. Review of Project Description: The Project Description (Section 2.0 of this EIR) was reviewed to identify all Project components that could result in physical environmental changes. The primary impact-producing activities identified are ground-disturbing activities, including but not limited to excavation, grading, drilling (for plugging), and soil removal required to decommission and restore well sites.
2. Review of Consultation Records: The results of the AB 52 and SB 18 consultation, detailed in Section 5.18.2, Consultation Process, were used as the primary source for identifying known and potential TCRs. This review included the "substantial evidence" provided by the Gabrieleno Band of Mission Indians – Kizh Nation, which identified specific cultural sensitivity in areas where oil and gas operations are located (e.g., the Baldwin Hills).
3. Review of Cultural Setting: The general ethnographic and archaeological context described in Section 5.5, Cultural Resources, was reviewed to provide a regional understanding of the cultural landscape, although the primary determination of TCR significance is based on the tribal consultation record.
4. Application of Thresholds: The analysis compares the locations of known and potential TCRs (as identified through consultation) with the potential locations of future Project-related ground disturbance. The potential for these activities to cause a "substantial adverse change" (e.g., destruction, physical alteration) to a TCR was then evaluated against the thresholds of significance established in Section 5.18.3.

The identification of TCRs and the determination of impact significance are based on the confidential information provided by the Kizh Nation during consultation. This information is part of the administrative record but is not disclosed in this public EIR, in accordance with California Government Code Sections 6254(r) and 6254.10.

5.18.4.2 Impact Analysis

This section analyzes the potential for the Proposed Project to cause a substantial adverse change to Tribal Cultural Resources, based on the methodology detailed above and the thresholds of significance established in Section 5.18.3. The analysis applies these thresholds to the "substantial evidence" received during the formal AB 52 consultation process. As this is a programmatic EIR, the analysis evaluates whether the future ground-disturbing activities required by the Project (i.e., decommissioning, remediation, and restoration) could result in significant impacts to identified TCRs.

Impact 5.18-1:	**Would the Project cause a substantial adverse change (such as physical destruction, damage, or alteration) to a Tribal Cultural Resource that is listed or eligible for listing in the California Register or a local register? [Threshold TCR-1]**

Less Than Significant Impact.

As detailed in Section 5.18.2, the County received substantial evidence from the Gabrieleno Band of Mission Indians – Kizh Nation identifying the Baldwin Hills region as a culturally significant landscape eligible for listing as a traditional cultural property. The Proposed Project mandates the decommissioning and restoration of oil and gas facilities within this and other potentially sensitive

landscapes. If unmanaged, the ground-disturbing activities associated with decommissioning (e.g., excavation, soil removal) could physically destroy or alter contributing sites, features, or ancestral remains.

However, to ensure this does not occur, the Project includes PDF-TCR-1 (Cultural Assessment) as a mandatory performance standard. Prior to the commencement of any ground-disturbing activities, the operator must retain a qualified archaeologist to conduct a preliminary Cultural Resources Assessment, including a records search through the South Central Coastal Information Center (SCCIC) and a Phase I pedestrian survey. The assessment must be submitted to the Department of Regional Planning for review and clearance prior to the issuance of local grading or demolition permits. By mandating the proactive identification of cultural resources before ground disturbance occurs, the Project ensures that appropriate avoidance or recovery protocols can be implemented in accordance with existing state law. Consistent with the programmatic findings of the CAP PEIR, the Project's built-in safeguard (PDF-TCR-1) ensures the Project would not cause a substantial adverse change to a listed or eligible TCR, and therefore the impact is less than significant.

Impact 5.18-2:	**Would the Project cause a substantial adverse change (such as physical destruction, damage, or alteration) to a resource determined by the County, in its discretion and supported by substantial evidence (including information provided during Tribal consultation), to be a significant TCR? [Threshold TCR-2]**

Less Than Significant Impact.

Based on the substantial evidence provided by the Kizh Nation during formal AB 52 consultation, the County has determined that the Baldwin Hills cultural landscape, including its associated ceremonial sites and sacred tar seeps, is a significant Tribal Cultural Resource.

While the Proposed Project requires the full decommissioning of oil and gas facilities within this sensitive area, the Project avoids causing a substantial adverse change through the mandatory implementation of PDF-TCR-1 (Cultural Assessment). By requiring a formal archaeological and cultural assessment prior to any earthwork, the County ensures that any specific, localized resources are identified and protected before operators are authorized to begin surface decommissioning. Consistent with the findings of the CAP PEIR, because this safeguard is embedded directly into the ordinance, the potential for inadvertent destruction of a significant TCR is minimized. Therefore, the impact is less than significant.

5.18.5 Cumulative Impacts

A cumulative impact is an impact that is created as a result of the combination of the Proposed Project together with other past, present, and reasonably foreseeable future projects causing related impacts (CEQA Guidelines Section 15355). This analysis considers whether the Project's significant and unavoidable impact on Tribal Cultural Resources (TCRs), when combined with other development, would result in a significant cumulative impact.

The geographic context for this cumulative analysis is the unincorporated areas of Los Angeles County. Past, present, and reasonably foreseeable future projects, including buildout under the Los Angeles County General Plan and other area-specific plans, have and will continue to involve ground-disturbing activities.

As established by the substantial evidence provided by the Gabrieleno Band of Mission Indians – Kizh Nation during consultation (see Section 5.18.2.2), past development (including the original installation of the oil fields) has resulted in widespread "spiritual desecration" and the destruction and burial of "unknown numbers of cultural sites and ancestral remains." This past development has already contributed to a significant, adverse cumulative impact on TCRs within Los Angeles County.

Present and reasonably foreseeable future projects will continue to involve ground disturbance, contributing to the ongoing pressure on TCRs. However, the Proposed Project's incremental contribution to this cumulative condition is not cumulatively considerable. The Project does not authorize new development; rather, it manages the closure of existing industrial sites. Through the mandatory application of PDF-TCR-1 (Cultural Assessment), the Project ensures that site-specific cultural surveys are conducted prior to decommissioning, preventing the unmitigated loss of resources. Because the Project includes a built-in mechanism to protect TCRs, its contribution to the regional cumulative impact is less than significant.

5.18.6 Level of Significance Before Mitigation

Based on the analysis in the preceding sections, the Project would result in a less than significant impact to Tribal Cultural Resources. The potential risks associated with ground-disturbing decommissioning activities are fully addressed by the Project's built-in performance standard, PDF-TCR-1 (Cultural Assessment), which requires site-specific identification and protection of resources prior to any earthwork.

5.18.7 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to Tribal Cultural Resources.

The requirement to conduct a Cultural Assessment is codified as a Project Design Feature (PDF-TCR-1) within the Proposed Project itself, acting as a mandatory, legally binding safeguard. Because the Project does not result in significant impacts to Tribal Cultural Resources, this PDF is not acting as CEQA mitigation for this resource topic.

5.18.8 Level of Significance After Mitigation

Impacts to Tribal Cultural Resources are less than significant without the need for mitigation measures. The Project will not result in any significant and unavoidable adverse impacts to TCRs.

5.18.9 References

California Governor's Office of Planning and Research (OPR). 2017. Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA.

California Native American Heritage Commission (NAHC). 2025. AB 52 and SB 18 Consultation List for the Revised Oil Well Ordinance Project. Provided to the County of Los Angeles. (Confidential).

California Public Resources Code.

Division 13, Sections 21000 et seq. (California Environmental Quality Act).

Section 21074 (Definition of Tribal Cultural Resources).

Sections 21080.3.1, 21080.3.2, 21082.3 (AB 52 Consultation Process).

Section 5020.1(k) (Definition of a local register).

Section 5024.1 (Criteria for the California Register).

Section 5097.98 (Disposition of Native American Human Remains).

California Code of Regulations, Title 14.

Sections 15000 et seq. (CEQA Guidelines).

Appendix G (CEQA Checklist).

California Government Code.

Section 6254(r) and 6254.10 (Confidentiality of TCR and Archaeological Information).

Sections 65352.3, 65352.4 (SB 18 Consultation).

California Health and Safety Code.

Section 7050.5 (Disposition of Human Remains).

County of Los Angeles. 2015. Los Angeles County General Plan 2035. (Chapter 17, Goals and Policies Summary, "Conservation and Natural Resources Element").

County of Los Angeles. 2025. Appendix B, Tribal Cultural Resources Consultation. (Confidential Administrative Record). Includes correspondence with the Native American Heritage Commission and all correspondence with California Native American Tribes, including the Gabrieleno Band of Mission Indians – Kizh Nation.

Los Angeles County Department of Regional Planning. 2045 Climate Action Plan Recirculated Draft Program Environmental Impact Report. March 2023.

CHAPTER 5.19 UTILITIES AND SERVICE SYSTEMS

This section of the EIR evaluates the potential for the Revised Oil Well Ordinance (Project) to result in significant impacts to utilities and service systems in the unincorporated areas of Los Angeles County. The analysis focuses on whether the Project would require the construction of new or expanded facilities, have sufficient utility capacity, or conflict with relevant regulations. The systems evaluated include wastewater treatment, water supply, stormwater drainage, solid waste disposal, and energy supply.

The analysis considers both short-term and long-term effects. Short-term impacts are related to the temporary demands and outputs of decommissioning activities. This primarily includes the generation of a substantial volume of solid waste (e.g., scrap metal, concrete, soil) and its effect on regional landfill capacity. It also includes the minor, temporary demand for water supply (for dust control) and energy (to power equipment). Long-term impacts are related to the permanent elimination of the ongoing demand for water, wastewater treatment services, and energy currently consumed by unincorporated oil and gas facilities, which is a beneficial effect.

This chapter is organized to present the environmental and regulatory setting, the thresholds of significance used to evaluate impacts under the California Environmental Quality Act (CEQA), the methods used to assess potential impacts, and the results of the impact analysis. The evaluation is based on information from the Project's Initial Study, the General Plan, and official planning documents from relevant service providers, such as the Los Angeles County Sanitation Districts and the Countywide Siting Element for solid waste.

During the scoping period, the County received comments related to utilities and service systems, as summarized in Table 2-1: Summary of Scoping Comments Received. Concerns were raised about the systems in place to ensure and fund the proper cleanup and remediation of well sites. Additionally, some commenters noted that reducing local oil and gas production could require the expansion of other utility systems, such as the electrical grid, to meet the region’s future energy demands. This chapter takes these comments into consideration and analyzes the project's potential effects on utilities, including energy infrastructure and the systems needed to manage site remediation.

5.19.1 Environmental Setting

5.19.1.1 Regulatory Setting

Federal Regulations

Federal laws and regulations establish the foundational, nationwide standards for environmental protection and public health related to utilities and service systems. These federal mandates are typically implemented and enforced at the state and local levels.

Wastewater and Stormwater

Clean Water Act (CWA): The CWA is the primary federal law governing water pollution in the United States. It establishes the basic structure for regulating discharges of pollutants into the "waters of the United States" and gives the U.S. Environmental Protection Agency (USEPA) the authority to implement pollution control programs and set water quality standards. The CWA's National Pollutant Discharge Elimination System (NPDES) program requires permits for any point source discharge, including from industrial sites and wastewater treatment plants, and also regulates stormwater discharges from construction activities. This act is directly relevant to the Project, as any wastewater generated during decommissioning and any stormwater runoff from the work sites must be managed in compliance with CWA standards.

Water Supply

Safe Drinking Water Act (SDWA): Originally passed in 1974 and subsequently amended, the SDWA authorizes the USEPA to set national health-based standards for drinking water to protect against both naturally-occurring and man-made contaminants. The act's National Primary Drinking Water Regulations (NPDWR) are legally enforceable standards that apply to all public water systems and limit the levels of specific contaminants. This act ensures the fundamental quality and safety of the regional water supply available to the unincorporated areas.

Solid and Hazardous Waste

Resource Conservation and Recovery Act (RCRA): RCRA gives the USEPA the authority to control hazardous and non-hazardous solid waste from "cradle-to-grave."

- Subtitle C of RCRA establishes a comprehensive program for managing hazardous waste, including its generation, transportation, treatment, storage, and disposal.
- Subtitle D provides a framework for the management of non-hazardous solid wastes by states and local governments.

RCRA is highly relevant to the Project. Any hazardous waste generated during the decommissioning of oil and gas sites (such as contaminated soil or sludge) must be identified, transported, and disposed of in strict accordance with RCRA's hazardous waste regulations. The disposal of non-hazardous debris (e.g., concrete, scrap metal) is subject to the framework established under Subtitle D.

Summary of Federal Utility Considerations

The federal government's primary role in regulating utilities is to establish the minimum nationwide standards for environmental protection and public health, particularly for water quality and waste management. The key federal considerations for this Project are the mandatory requirements of the Clean Water Act and the Resource Conservation and Recovery Act, which will govern the management of wastewater, stormwater, and all solid and hazardous waste generated during decommissioning activities. The direct planning for and provision of utility capacity, however, is a function of state and local agencies.

State and Regional Regulations

State laws and regional agencies implement and often expand upon federal standards, with a strong focus on water quality, long-range water supply planning, resource conservation, and solid waste management.

Wastewater

Porter-Cologne Water Quality Control Act: This is the primary state law for water quality regulation. It grants broad authority to the State Water Resources Control Board (SWRCB) and the nine local Regional Water Quality Control Boards (RWQCBs) to protect the quality of state waters. The Porter-Cologne Act establishes the regulatory framework for the issuance of waste discharge requirements for any discharge to land or water, implementing the requirements of the federal Clean Water Act. Any wastewater or contaminated stormwater generated during the Project's decommissioning activities must be managed in compliance with RWQCB requirements.

Water Supply

Urban Water Management Planning Act: This state law requires California's urban water suppliers to prepare an Urban Water Management Plan (UWMP) every five years. These plans are the foundational documents for water service, as they assess the reliability of water supplies to meet existing and future demands over a 20-year horizon, including during normal, single-dry, and multiple-dry years.

Water Supply Assessments (SB 610 and SB 221): To ensure a stronger link between land use and water supply planning, SB 610 and SB 221 require that large new development projects undergo a Water Supply Assessment (WSA). This assessment, based on the local UWMP, must demonstrate that sufficient water supplies are available to serve the new development. These requirements are not applicable to the Project because it is a regulatory action and not a new development project as defined in the Water Code.

Solid Waste

Integrated Solid Waste Management Act (AB 939): This state law requires every county to prepare a Countywide Integrated Waste Management Plan (CIWMP) and a Countywide Siting Element that demonstrates at least 15 years of ongoing landfill disposal capacity. This requirement is directly

relevant to the Project, as the County's Siting Element provides the official analysis of landfill capacity used to evaluate the impact of decommissioning waste.

Assembly Bill 341 (2011): This law increased the statewide solid waste diversion goal to 75 percent and established mandatory commercial recycling.

California Green Building Standards Code (CALGreen): Part 11 of Title 24, CALGreen, requires that at least 65 percent of the nonhazardous construction and demolition debris from projects be recycled or diverted from landfills. This regulation is directly applicable to the debris that will be generated during the decommissioning of the oil and gas sites.

Energy and Other Utilities

California Public Utilities Commission (CPUC): The CPUC regulates privately-owned electric and natural gas utilities in California. Its regulations, such as General Order 112E, specify mandatory design, construction, inspection, and safety standards for natural gas pipelines. These safety standards are applicable to any utility pipelines that may be present on or near the oil and gas sites to be decommissioned.

California Energy Commission (CEC): The CEC is the state's primary energy policy and planning agency. It forecasts the state's energy needs and promotes energy efficiency and conservation. The CEC's Building Energy Efficiency Standards (Title 24, Part 6) and Appliance Efficiency Regulations (Title 20) establish mandatory energy conservation requirements for new construction and new appliances. While these standards are not directly applicable to the Project's decommissioning activities, the Project's long-term effect of reducing energy demand is consistent with state energy conservation goals.

Summary of State and Regional Considerations

The most relevant state and regional regulations for this Project are those related to solid waste. The County's state-mandated 15-year landfill capacity plan is the primary tool for assessing the significance of the waste generated by decommissioning, and state laws like CALGreen will require the recycling and diversion of a substantial portion of that waste. State and regional regulations related to providing water, wastewater, and energy capacity for new development are not applicable. Finally, CPUC safety standards for utilities will be applicable to any existing utility infrastructure during decommissioning activities.

Local Policies, Plans, and Regulations

The County of Los Angeles manages utilities and service systems through a framework led by the General Plan and implemented by specific ordinances and long-range master plans for each service system.

County of Los Angeles General Plan

The Public Services and Facilities Element of the General Plan provides the key goals and policies related to ensuring adequate utility service, promoting conservation, and managing solid waste.

- Framework for New Growth: A primary focus of the General Plan is to ensure that adequate utility services and facilities are provided in conjunction with new development (Goal PS/F 1, Policy PS/F 1.2). The plan's key implementation tool for this is Program PS/F-1, which calls for the preparation of Capital Improvement Plans to assess infrastructure needs (sewer, water, waste management) to serve planned growth. Because the proposed Project is a regulatory phase-out of an existing use and does not induce population growth, these policies and programs for managing the impacts of new development are not directly applicable for assessing an adverse impact from the Project.
- Relevant Policies for the Project: While the growth-related policies are not directly applicable, the Project is highly consistent with the General Plan's goals for resource conservation and efficient system management. Key relevant policies include:
    - Policy PS/F 2.1: Support water conservation measures.
    - Policy PS/F 4.1: Encourage the planning and continued development of efficient countywide sewer conveyance treatment systems.
    - Policy PS/F 5.2: Ensure adequate disposal capacity by providing for environmentally sound and technically feasible development of solid waste management facilities.
    - Policy PS/F 5.7: Encourage the recycling of construction and demolition debris generated by public and private projects.

Wastewater

Los Angeles County Sanitation Districts (LACSD) Connection Fee Program: The LACSD, a regional service provider, funds capital improvements to its wastewater conveyance and treatment system through a connection fee program. These fees are charged to new developments or redevelopments to fund the additional capacity required to serve them. This program is not applicable to the Project, as it does not involve new development that would create a new, permanent demand on the wastewater system.

Water Supply

Los Angeles County Green Building Standards Code (Title 31): This code implements state CALGreen requirements at the local level. It mandates water-efficient fixtures and drought-tolerant landscaping for new construction to reduce water demand. While these standards are not directly applicable to the Project's decommissioning activities, the Project's long-term effect of reducing water demand from the elimination of industrial uses is consistent with the County's broader water conservation goals.

Solid Waste

Los Angeles Countywide Siting Element: As part of the state-mandated Countywide Integrated Waste Management Plan, the Siting Element is the County's primary long-range planning document for solid waste. It provides a comprehensive analysis of the County's landfill network, remaining disposal capacity, and strategies for ensuring at least 15 years of capacity for all

jurisdictions within the County. This document is the foundational source for the solid waste analysis in this EIR.

Construction and Demolition (C&D) Debris Recycling and Reuse Ordinance: This ordinance (Los Angeles County Code, Chapter 20.87) requires that projects in the unincorporated areas recycle or reuse at least 50 percent of the C&D debris they generate. This ordinance is directly applicable to the debris that will be generated during the decommissioning of oil and gas sites.

Energy

OurCounty Sustainability Plan (2025): The County's comprehensive sustainability plan sets a foundational goal (Goal 1) for a "fossil fuel-free LA County." The Project is a direct implementation of this core sustainability goal by phasing out local fossil fuel extraction. The long-term reduction in energy demand from the elimination of industrial sites is also consistent with the County's energy conservation objectives.

Summary of Local Utility Considerations

The most relevant local regulations for the Project are the Countywide Siting Element, which confirms adequate long-term landfill capacity, and the C&D Debris Recycling Ordinance, which will ensure a substantial portion of the decommissioning waste is diverted from landfills. Local plans and fee programs designed to mitigate the utility impacts of new growth are not applicable. The Project is consistent with the County's long-range sustainability goals, particularly the OurCounty plan's vision for a fossil fuel-free LA County.

5.19.1.2 Existing Environmental Conditions

Wastewater and Treatment Collection

Wastewater collection and treatment services in the unincorporated areas of Los Angeles County are provided by a combination of regional and local public agencies. The Project Area includes dense urban communities served by comprehensive sewer networks, as well as rural areas that rely on onsite wastewater treatment systems (OWTS), such as septic systems. This section describes the existing wastewater infrastructure and providers serving the unincorporated areas where oil and gas facilities are located.

Wastewater Generation and Collection

Based on the total estimated water demand for the unincorporated areas, the existing wastewater generation is estimated to be approximately 106,214,934 gallons per day (gpd). This wastewater is collected and conveyed through thousands of miles of sanitary sewer pipelines maintained by several key entities:

- Consolidated Sewer Maintenance District of Los Angeles County: Administered by the Los Angeles County Public Works (PW), this district operates and maintains over 4,600 miles of sanitary sewers serving most unincorporated areas and 40 cities.
- Los Angeles County Sanitation Districts (LACSD): LACSD owns, operates, and maintains approximately 1,400 miles of trunk sewers, which are the larger pipelines that convey wastewater from local sewer lines to treatment plants. This system conveys about 500 million gallons per day (mgd) of wastewater.
- City of Los Angeles Bureau of Sanitation (LABS): LABS operates and maintains an extensive network of more than 6,700 miles of sewers, serving the City of Los Angeles and some adjacent unincorporated communities.
- Marina del Rey Sewer Maintenance District: This district provides specific sewer maintenance services for the community of Marina del Rey.

Wastewater Treatment Process and Providers

Wastewater collected from the unincorporated areas is conveyed to regional water reclamation plants (WRPs) or treatment plants for processing before being discharged or reused. The treatment process typically occurs in three main phases:

- Primary Treatment: Raw wastewater enters settling tanks where heavy solids sink to the bottom and lighter materials like grease and oil float to the surface. These materials are removed, and the remaining liquid proceeds to the next phase.
- Secondary Treatment: This biological phase uses bacteria and oxygen to break down and consume organic matter remaining in the wastewater. This is followed by another settling process to remove the microorganisms.
- Tertiary Treatment: The wastewater is filtered to remove any remaining microscopic solid particles. Most wastewater that undergoes this advanced level of treatment is then disinfected using methods like chlorine or ultraviolet (UV) light.

The resulting high-quality treated water, known as recycled water, is often reused for beneficial purposes such as landscape and agricultural irrigation, industrial processes, and recharging groundwater basins.

Several public agencies are responsible for treating wastewater generated in the unincorporated County:

- Los Angeles County Sanitation Districts (LACSD): As the largest provider, LACSD serves many unincorporated areas and 78 cities.
- City of Los Angeles Bureau of Sanitation (LABS): LABS serves several unincorporated communities adjacent to the City of Los Angeles, including areas in the Santa Monica and Santa Susana Mountains, Marina del Rey, and La Crescenta-Montrose.
- Las Virgenes Municipal Water District (LVMWD): LVMWD operates the Tapia Water Reclamation Facility, which serves unincorporated communities in the Santa Monica Mountains Planning Area.
- Los Angeles County Department of Public Works (PW): The PW operates three smaller treatment plants that serve the City of Malibu and adjacent unincorporated areas.

Wastewater Treatment Facilities

The Project is most relevant to 10 of the County's 11 Planning Areas (excluding only the Coastal Islands Planning Area, as there are no recoverable known oil & natural gas reserves), which are served by a network of regional treatment facilities. All facilities listed provide primary, secondary, and tertiary treatment unless otherwise specified.

1. Antelope Valley Planning Area
    a. LACSD Lancaster Water Reclamation Plant (WRP): This facility has a treatment capacity of 17 mgd and treated an average of 14 mgd in 2013.
    b. LACSD Palmdale WRP: This facility has a capacity of 12 mgd and treated an average of 8.7 mgd in 2013.
2. Santa Clarita Valley Planning Area
    a. Valencia WRP (LACSD): Located in an unincorporated area, this plant has a capacity of 21.6 mgd and treated average flows of 14.5 mgd in 2013.
    b. Saugus WRP (LACSD): This plant has a capacity of 6.2 mgd and treated average flows of 5.2 mgd in 2013.
3. San Fernando Valley Planning Area
    a. LABS Donald C. Tillman WRP: This facility has an 80 mgd capacity and treated average daily flows of 67 mgd.
    b. LABS Los Angeles-Glendale WRP: This facility has a treatment capacity of 20 mgd.
4. Santa Monica Mountains Planning Area
    a. Tapia Water Reclamation Facility (LVMWD): This facility has a capacity of 16 mgd and treated an average of 9.5 mgd.
5. West and East San Gabriel Valley Planning Areas
    a. LACSD San Jose Creek WRP: Serving one million people in the San Gabriel Valley, this major facility has a capacity of 100 mgd and treated average flows of 63 mgd in 2013.
    b. LACSD Whittier Narrows WRP: This facility has a capacity of 15 mgd and treated 8.6 mgd on average in 2013.
    c. LACSD Pomona WRP: This plant has a capacity of 15 mgd and treated average flows of 8.3 mgd in 2013.
6. Metro and South Bay Planning Areas
    a. Joint Water Pollution Control Plant (JWPCP) (LACSD): This is one of the largest plants in the region, with a capacity of 400 mgd for primary and secondary treatment. It treated average flows of 264 mgd in 2013.
7. Westside Planning Area
    a. LABS Hyperion Water Reclamation Plant: Serving Marina del Rey and a large portion of the City of Los Angeles, this plant has a capacity of 450 mgd and treated average flows of 362 mgd.
8. Gateway Planning Area
    a. LACSD Long Beach WRP: This plant has a capacity of 25 mgd and treated average flows of 17 mgd in 2013.
    b. LACSD Los Coyotes WRP: This facility has a capacity of 37.5 mgd and treated average flows of 21 mgd in 2013.

Water Supply and Distribution Systems

Water supply in the unincorporated areas of Los Angeles County is a complex system involving imported water, local groundwater, recycled water, and other sources managed by a multi-layered network of public agencies. The region's water resources are managed collaboratively through Integrated Regional Water Management plans that cross jurisdictional boundaries to address long-term supply reliability.

Integrated Regional Water Management

Integrated Regional Water Management (IRWM) is a collaborative and comprehensive approach to managing all facets of water resources in a region, including water supply, water quality, wastewater treatment, and flood/stormwater management. The IRWM process crosses jurisdictional and political boundaries to develop mutually beneficial solutions among multiple agencies and stakeholders. Los Angeles County is covered by three IRWM regions:

- Antelope Valley IRWM Region: This region spans 2,400 square miles across northern Los Angeles County and southeastern Kern County. Agricultural water demand accounts for about half of the total demand.
- Upper Santa Clara River IRWM Region: This region covers the 654-square-mile portion of the Santa Clara River Watershed located within Los Angeles County.
- Greater Los Angeles County (GLAC) IRWM Region: This 2,058-square-mile region covers the remainder of Los Angeles County and includes portions of Ventura, Orange, and San Bernardino counties. The GLAC region is divided into five subregions for planning purposes:
    - North Santa Monica Bay Subregion: Includes the Santa Monica Mountains Planning Area.
    - Upper Los Angeles River Subregion: Includes the San Fernando Valley.
    - Upper San Gabriel and Rio Hondo Subregion: Includes the East and West San Gabriel Valley Planning Areas.
    - South Bay Subregion: Includes the Westside and South Bay Planning Areas.
    - Lower San Gabriel and Los Angeles Rivers Subregion: Includes the Gateway Planning Area.

Water Supply Sources and Agencies

Los Angeles County relies on a diverse portfolio of eight primary water supply sources:

1. State Water Project (SWP): Imported water from Northern California is delivered via the SWP. The Metropolitan Water District of Southern California (MWD) wholesales most of this water to its 26 member agencies.
2. Colorado River Aqueduct: A 242-mile aqueduct delivers imported water from the Colorado River to Southern California, also wholesaled by the MWD.
3. Groundwater: Water is pumped from local groundwater basins, which are recharged by rainfall, stormwater, and recycled water.
4. Water Banking: Water is stored in large groundwater basins outside the region, typically in wet years, for later use during dry years.
5. Surface Water: Local supply is captured from streams and reservoirs.
6. Recycled Water: Highly treated municipal wastewater is used for non-potable purposes like irrigation and groundwater recharge.
7. Desalination: Ocean water is treated to remove salt and minerals, creating a potable water source.
8. Stormwater Capture: Local stormwater and runoff are captured for direct non-potable use.

The delivery of this water involves up to four tiers of agencies:

1. State Operator: The California Department of Water Resources (DWR) operates the State Water Project.
2. Primary Wholesaler: The Metropolitan Water District of Southern California (MWD) is the primary importer and wholesaler of water for Southern California. It purchases water from the SWP and Colorado River and sells it to its member agencies. The MWD serves approximately 300 cities and unincorporated communities and supplies around 650 billion gallons of water annually.
3. Secondary Wholesalers: Agencies like the Central Basin, West Basin, and Upper San Gabriel Valley Municipal Water Districts purchase water from the MWD and distribute it to local purveyors. Other key wholesalers include the Castaic Lake Water Agency (CLWA) and the Antelope Valley-East Kern Water Agency (AVEK).
4. Retail Purveyors: These are the final distributors that provide water directly to homes and businesses. They can be city water departments, private companies, or special districts like the Los Angeles County Waterworks Districts.

Several key agencies are particularly relevant to the unincorporated areas:

- Antelope Valley-East Kern Water Agency (AVEK): As the third-largest water entitlement holder from the SWP, AVEK serves a 2,400-square-mile area. While it imports 75,000 acre-feet annually, local sources still comprise more than half of the water supply in its service area.
- Castaic Lake Water Agency (CLWA): CLWA provides imported SWP water to four retail purveyors in the Santa Clarita Valley, where groundwater accounts for about 40% of the water supply.
- Littlerock Creek Irrigation District & Palmdale Water District: These historic districts in the Antelope Valley were instrumental in constructing the Littlerock Dam and now manage a combination of local surface water, groundwater, and imported SWP water to serve the region's growing urban population.

Water Supply and Demand Projections

Water supply and demand projections are compiled in the IRWMPs, which draw data from the Urban Water Management Plans (UWMPs) of the various water wholesalers and purveyors in each region.

- Antelope Valley IRWM Region
    - Much of the Antelope Valley Planning Area relies on private groundwater wells. Areas with municipal service are largely served by Los Angeles County Waterworks District 40 (WWD40) and the Quartz Hill Water District (QHWD). The combined population in these districts is projected to increase significantly. WWD40's UWMP forecasts that with planned water supply projects, there will be adequate water to meet demands in normal, single-dry-year, and multiple-dry-year conditions through the planning horizon.
    - To meet future demand, agencies in the Antelope Valley are pursuing several options to augment supply:
        - Imported Water: AVEK and its retail partners are developing a "New Water Supply" development fee to fund the acquisition of additional imported water.
        - Recycled Water: The availability of recycled water from the Lancaster and Palmdale WRPs is forecast to increase. A planned backbone distribution system will help deliver this water for municipal irrigation and industrial uses.

        - Groundwater Banking: This strategy involves storing water in wet years for recovery during droughts. Though it doesn't increase the total supply, it enhances reliability. Major projects include the proposed Antelope Valley Water Bank and the expansion of the Semitropic Water Storage Bank in Kern County.
- Upper Santa Clara River IRWM Region
    - The EIR for the Santa Clarita Valley Area Plan determined that water supplies would be adequate for the buildout of that plan within the CLWA service area but identified significant and unavoidable impacts for areas outside this boundary.
- Greater Los Angeles County (GLAC) IRWM Region
    - Projections for the five subregions of the GLAC show a strategic shift in water supply sources. While groundwater is projected to remain a stable component, comprising about 35-36% of the total supply, the reliance on imported water is forecasted to decline from 53% in 2015 to 45% in 2035. This reduction will be offset by planned increases in local sources, primarily recycled water, conservation, stormwater capture, and desalination.

Water Treatment Facilities

Before distribution, raw water is treated to meet stringent state and federal drinking water standards. Major treatment facilities serving Los Angeles County include:

- Metropolitan Water District (MWD): The MWD operates five major treatment plants with a total capacity of approximately 2.64 billion gallons per day. Two are located in Los Angeles County:
    - Joseph Jensen Treatment Plant (Granada Hills), with a 750 mgd capacity.
    - F. E. Weymouth Treatment Plant (La Verne), with a 520 mgd capacity.
- Central Basin Municipal Water District: Operates a groundwater treatment facility in Pico Rivera to remove VOC contamination from the Central subbasin.
- West Basin Municipal Water District: Operates a desalination facility in Torrance to treat groundwater impacted by seawater intrusion.
- Three Valleys Municipal Water District (TVMWD): Operates the 25 mgd Miramar Water Treatment Plant in Claremont.

Solid Waste

Solid waste management in the unincorporated areas of Los Angeles County involves a structured system of collection, disposal, and diversion managed by the Los Angeles County Department of Public Works (PW) in partnership with private waste haulers. This system is designed to provide uniform service, promote recycling, and ensure compliance with federal and state waste reduction mandates.

Solid Waste Collection Systems

Historically, many unincorporated areas operated under an open-market system where residents and businesses contracted directly with waste haulers. To better meet state waste reduction goals and consumer demands for improved service, DPW has transitioned to a more regulated framework consisting of three primary collection systems:

- Garbage Disposal Districts (GDDs): The County has established seven GDDs, primarily in South Los Angeles and Malibu communities. In these districts, a single private waste hauler is contracted by the DPW to provide exclusive collection services to all residents and businesses. The operational costs for these services are funded through special assessments on property tax bills.
- Residential Franchise System: This system provides exclusive trash and recycling services to single-family residences and duplexes within 21 designated unincorporated communities. An exclusive franchise agreement is awarded to a hauler for each area, establishing high standards for service quality and promoting neighborhood cleanliness through bundled services like free bulky item pick-ups, annual cleanup events, and environmental workshops. This system reduces wear on local streets by limiting the number of collection trucks and helps the County meet state-mandated waste diversion targets. The DPW is considering expanding this system to replace the remaining open-market residential service areas.
- Commercial Franchise System: Effective July 1, 2012, all businesses and multi-family residences in unincorporated areas are served by a non-exclusive franchise system. Under this model, multiple DPW-approved waste haulers can compete for customers, but they must all operate under a franchise agreement that sets minimum performance and customer service standards. This ensures that all commercial customers receive benefits such as free recycling services, on-site waste consultations, free collection of bulky items and electronic waste, and the use of clean-fuel collection trucks to reduce noise and air pollution.

Solid Waste Disposal and Diversion Facilities

Solid waste collected in the unincorporated areas that is not diverted through recycling or other programs is disposed of at regional landfills. The DPW monitors landfill capacity and waste flows as part of its long-range solid waste management planning.

Landfills: Waste from the unincorporated areas is transported to a network of active landfills within and outside of Los Angeles County. Total solid waste disposal from all of Los Angeles County is managed to ensure adequate long-term capacity, as outlined in the County's Integrated Waste Management Plan. Following the closure of major facilities like the Puente Hills Landfill, waste streams have been redirected to other regional landfills, such as the Chiquita Canyon Landfill in Castaic and the Sunshine Canyon Landfill in Sylmar. These facilities have permitted capacities, specified daily throughput limits, and estimated closure dates that are continuously monitored by county and state agencies.

Transfer Stations: Before transport to distant landfills, solid waste is often consolidated at transfer stations. At these facilities, smaller collection trucks unload their contents, which are then reloaded onto larger, long-distance vehicles. This process improves the efficiency of the waste disposal network.

Refuse-to-Energy Facilities: Los Angeles County is served by two refuse-to-energy facilities, the Commerce Refuse-to-Energy Facility and the Southeast Resource Recovery Facility (SERRF) in Long Beach. These facilities incinerate solid waste to generate electricity, providing an alternative to landfilling for non-recyclable materials.

Recycling and Solid Waste Diversion: The County and its franchise partners operate numerous programs to divert waste from landfills in compliance with state law. These programs include curbside recycling for residents and businesses, green waste collection for composting, the operation of Material Recovery Facilities (MRFs) to sort and process recyclables, household hazardous waste collection events, public education and outreach, and source reduction initiatives.

Energy and Other Utilities

Energy and communication services in the unincorporated areas are provided by large regional utility companies through extensive infrastructure networks.

Electricity

Southern California Edison (SCE) is the primary electricity provider for all unincorporated areas of Los Angeles County, as well as for numerous cities within the county. SCE's service area covers 50,000 square miles of central, coastal, and Southern California. Power is delivered to customers through a comprehensive grid of high-voltage transmission lines, substations that step down the voltage, and local distribution lines that connect directly to homes and businesses.

SCE generates electricity from a diverse portfolio of sources, including natural gas, nuclear, and hydroelectric power plants, and is increasingly incorporating renewable energy sources such as solar, wind, and geothermal power to meet California's renewable energy mandates. Total electricity demand in SCE's service area reflects the needs of millions of residential and commercial customers. Demand fluctuates based on weather, economic activity, and population growth, with long-range forecasts managed by SCE and tracked by the California Energy Commission (CEC).

Natural Gas

Southern California Gas Company (SoCalGas) is the principal provider of natural gas to most of Southern California, including the unincorporated areas of Los Angeles County. The City of Long Beach is a notable exception, as it operates its own municipal gas utility. SoCalGas distributes natural gas to residential, commercial, and industrial customers for uses such as heating, cooking, and powering industrial processes.

The natural gas is delivered through a vast network of underground transmission and distribution pipelines. SoCalGas does not produce natural gas but purchases it from sources throughout the western United States and Canada. The company operates several large underground storage facilities, including the Aliso Canyon Natural Gas Storage Facility, to ensure a reliable supply is available to meet peak demand, particularly during winter months. Forecasts for natural gas supply and demand are managed by SoCalGas and reported to the California Public Utilities Commission (CPUC).

Communication Systems

Communication infrastructure, including telephone, mobile phone, cable television, and internet services, is well-established throughout the unincorporated areas, though service levels may vary between urban and rural communities.

- Telephone and Mobile Phone Service: Landline telephone service is primarily provided by AT&T. A competitive market of mobile phone providers, including AT&T, Verizon Wireless, and T-Mobile, offers widespread coverage via a network of cell towers.
- Cable Television and Internet Service: Several private companies provide cable television and high-speed internet services to unincorporated areas. Major operators include Charter Spectrum and AT&T.

The County of Los Angeles serves as the local franchise authority for cable operators. However, under current federal law, the County's authority is limited. The County does not regulate the rates that companies charge for services or determine their channel lineups. Federal law allows cable providers to operate in a deregulated manner regarding pricing and programming, though the County does manage franchise agreements and responds to community inquiries regarding service.

5.19.2 Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, County practice, and the project's specific considerations, a significant impact on utilities and service systems would occur if the Project would:

Wastewater

U-1: Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.

U-2: Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

U-3: Result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.

Water Supply

U-4: Require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

U-5: Not have sufficient water supplies available to serve the project from existing entitlements and resources, necessitating new or expanded entitlements.

Solid Waste

U-6: Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

U-7: Not comply with federal, state, and local statutes and regulations related to solid waste.

Other Utilities and Service Systems

U-8: Increase demand for other public utilities (such as electricity, natural gas, or communication systems) to such an extent that it would require or result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

5.19.3 Environmental Impacts

5.19.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR concluded that the implementation of the CAP would not result in significant adverse physical impacts to water, wastewater, solid waste, or energy utilities. While physical decommissioning generates temporary solid waste (e.g., concrete and metal), the CAP PEIR determined this is mitigated by mandatory compliance with existing state and local diversion/recycling regulations, resulting in less than significant impacts (CAP PEIR, Chapter 3.19). Therefore, this analysis evaluates the Project’s direct and indirect utility implications to ensure consistency with the CAP PEIR's findings that the phase-out of fossil fuels does not place an undue burden on regional service systems. Because the Project's temporary decommissioning demands are strictly managed by existing regulations (such as the County's C&D Debris Recycling and Reuse Ordinance) and the Project's enforceable Project Design Features (PDFs), this analysis focuses on demonstrating why programmatic mitigation measures from the CAP PEIR are not required.

The methodology used to evaluate potential impacts on utilities and service systems for the Revised Oil Well Ordinance (Project) is based on a comparison of the Project's limited, temporary demands against the capacity and planning frameworks of existing service providers. As the Project involves the cessation of an existing land use rather than the introduction of a new one, the analysis focuses on the short-term requirements during the decommissioning phase and the long-term reduction in service demands once oil and gas operations cease.

Wastewater

The analysis of potential impacts on wastewater collection and treatment systems is based on a qualitative assessment. The methodology involves:

- Identifying the wastewater service providers for the unincorporated areas where subject oil and gas facilities are located.
- Estimating the minimal, temporary wastewater generation associated with the decommissioning workforce (e.g., portable sanitation facilities).
- Confirming that this temporary demand does not require the construction of new or expanded wastewater treatment or collection facilities and can be readily absorbed by the existing capacity of the region's service providers, as detailed in Section 5.19.1.2, Existing Environmental Conditions.

Water Supply

The analysis of water supply is governed by the principles articulated by the California Supreme Court in *Vineyard Area Citizens for Responsible Growth, Inc., v. City of Rancho Cordova*. CEQA requires a sufficient analysis to allow decision-makers to evaluate the reasonably foreseeable impacts of supplying water to a project. While the Vineyard case largely pertains to large, multi-phase development projects with significant long-term water demands, its principles inform the methodology for this analysis.

The methodology for assessing water supply impacts for this Project involves:

- Demand Estimation: The water demand for the Project is limited to the temporary, non-potable needs during decommissioning activities, such as dust control and equipment cleaning. This demand is minimal and short-term. The analysis confirms that the long-term cessation of oil and gas operations, which can be water-intensive, will result in a net reduction in on-site water demand.
- Supply Analysis: The analysis relies on existing Urban Water Management Plans (UWMPs) prepared by regional and local water agencies to demonstrate the reliability of the region's water supply portfolio. Although the Project's demand is negligible and would not have been specifically accounted for in UWMPs, these plans provide the necessary evidence that sufficient supplies exist to accommodate minor, temporary demands without impacting service to other customers.
- Reliability Assessment: The assessment acknowledges the challenges facing Southern California's imported water supplies, including environmental regulations affecting the State Water Project (SWP) and long-term allocation agreements for the Colorado River Aqueduct (CRA). The analysis references the MWD's 2010 Regional UWMP, which confirms that through a combination of imported water, local supplies, storage, and conservation, the region can provide reliable water supplies under normal, single-driest-year, and multiple-dry-year conditions. The role of storage and MWD's Water Supply Allocation Plan (WSAP) are considered as part of this reliability framework. The analysis also considers the role of managed groundwater basins, where pumping is limited to the "safe operating yield" to ensure long-term sustainability.

Because the Project generates a negligible, temporary water demand and results in a long-term demand reduction, the core question under CEQA—adequately addressing the impacts of

supplying water—is answered by confirming that the existing, complex, and reliable regional water system can easily accommodate the Project without any adverse effects on supply.

Solid Waste

The methodology for analyzing solid waste impacts involves the following steps:

- Waste Generation Estimate: The analysis estimates the volume and type of solid waste that will be generated during the decommissioning of oil wells and associated facilities. This waste primarily consists of construction and demolition (C&D) debris, such as scrap metal, concrete, and piping.
- Disposal Capacity Analysis: The analysis identifies the regional landfills that would serve the Project and confirms their available permitted capacity by referencing the Los Angeles County Integrated Waste Management Plan and other DPW planning documents.
- Regulatory Compliance: The methodology confirms that all waste generated by the Project will be handled, transported, and disposed of in compliance with federal, state, and local regulations, including the California Integrated Waste Management Act (AB 939) and local C&D debris recycling ordinances that mandate waste diversion.

Other Utilities and Service Systems

For other utilities, including electricity, natural gas, and communication systems, the methodology is a qualitative assessment. The analysis confirms that the temporary energy and communication needs during decommissioning can be met by existing infrastructure operated by providers like Southern California Edison (SCE) and Southern California Gas Company (SoCalGas). It also confirms that the Project will not require the construction of new or expanded energy or communication facilities and will result in the long-term elimination of energy demand associated with active oil and gas production.

5.19.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code (Titles 12 and 22) and the General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once nonconforming, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Project characteristics related to utilities and service systems are primarily associated with the temporary demands during decommissioning and the long-term cessation of operational demands:

- Elimination of New Utility Demands: By prohibiting the establishment of new oil and gas facilities, the Project prevents future long-term demands on water, wastewater, solid waste, and energy utility systems that would be associated with new oil and gas exploration and production.
- Temporary Utility Demands During Decommissioning: The decommissioning phase will require temporary and minimal use of certain utilities.

    - Water Supply: A limited, temporary supply of non-potable water will be needed for activities such as dust control during grading and equipment cleaning. This demand will be short-term and cease once a site is fully decommissioned.
    - Wastewater: Minimal wastewater will be generated by the temporary workforce on-site, which will be handled through portable sanitation facilities and will not connect to the sewer system.
    - Solid Waste: Decommissioning will generate a one-time stream of solid waste, primarily consisting of construction and demolition (C&D) debris from the removal of concrete pads, scrap metal from pipelines and equipment, and other materials. This waste will be managed in accordance with state and local recycling and disposal regulations.
    - Energy: Temporary electricity and fuel will be required to power equipment used for well plugging, facility dismantling, and site restoration.
- Long-Term Reduction of Utility Demands: The primary characteristic of the Project is the long-term reduction and eventual elimination of utility demands associated with active oil and gas operations. This includes the cessation of:
    - Water consumption for drilling, maintenance, and processing activities.
    - Wastewater generation from production processes.
    - Electricity and natural gas consumption required to power pumps, compressors, and other operational equipment.
    - The routine generation of operational solid waste.
- Compliance with Existing Utility Frameworks: All decommissioning activities will occur at sites already located within the service territories of existing utility providers. The Project does not involve extending utility infrastructure into new areas. Temporary connections and waste disposal will be coordinated through the established providers and facilities described in the environmental setting.

Overall, the Project is characterized by a short-term, temporary demand on utility systems during the decommissioning phase, followed by a permanent reduction in demand as industrial oil and gas operations are phased out. The Project does not introduce new permanent residents or commercial/industrial uses that would create a long-term burden on utility providers or service systems.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for utilities and service systems.

5.19.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance and well abandonment that govern the decommissioning process.

From the perspective of utilities and service systems, the Project is expected to result in two primary types of effects:

- Short-term, temporary demands on service systems during the decommissioning of existing facilities. This includes a minimal, temporary demand for water for dust control, a one-time generation of construction and demolition (C&D) solid waste, and temporary consumption of energy to power equipment. Such demands would be limited in duration and scope, consistent with standard industrial decommissioning activities.
- Long-term beneficial effects on service systems resulting from the permanent cessation of industrial oil and gas operations. This includes the elimination of ongoing water consumption, wastewater generation, and energy demand associated with active production, thereby reducing the long-term load on regional utility infrastructure.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds identified in Section 5.19.2. The analysis considers both the temporary demands during the decommissioning phase and the permanent effects of ceasing operations. The evaluation relies on the capacity information and planning documents for the various utility providers detailed in the environmental setting to determine whether the Project's temporary demands could adversely affect service system capacity or reliability.

Impact 5.19-1: Would the proposed Project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? [Threshold U-1]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would cause an exceedance of wastewater treatment requirements established by the applicable Regional Water Quality Control Board (RWQCB), which includes the Los Angeles RWQCB and the Lahontan RWQCB for the Project Area. The analysis considers sanitary wastewater, industrial process water, and stormwater discharges.

Sanitary Wastewater

The Project involves the phase-out and decommissioning of existing industrial oil and gas facilities; it does not include the construction or operation of new residential, commercial, or other land uses that would generate sanitary wastewater. The temporary workforce required for decommissioning activities will generate a negligible amount of sanitary wastewater, which will be managed through self-contained, portable chemical toilets serviced by licensed contractors. No wastewater from these temporary facilities will be discharged into the local sanitary sewer system or to surface waters.

Because the Project does not introduce any new permanent sources of sanitary wastewater, it will not contribute to wastewater flows treated by the regional Water Reclamation Plants (WRPs) operated by LACSD, LABS, or other providers. Therefore, the Project will not cause or contribute to an exceedance of the treatment capacity or waste discharge requirements of any wastewater treatment provider.

Industrial and Stormwater Discharges

Oil and gas operations involve industrial materials and processes, and the decommissioning phase can be a source of potential pollutants if not properly managed.

- Stormwater Discharges from Decommissioning: Decommissioning activities, such as the removal of equipment and remediation of well pads, are similar to construction activities. For any site where ground disturbance is one acre or more, the activity will be subject to the State's National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Construction Permit). This permit requires the operator to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must identify and implement Best Management Practices (BMPs) to control and treat stormwater runoff, preventing sediment, residual hydrocarbons, and other potential pollutants from leaving the site and violating RWQCB water quality objectives.
- Industrial Wastewater Discharges: The Project's primary function is to eliminate the ongoing industrial operations that are a potential source of industrial wastewater. Decommissioning and site restoration activities, conducted in accordance with the Project's performance standards for Well Plugging and Abandonment and Site Maintenance, ensure the proper removal of industrial equipment, contaminated materials, and the sealing of wells to prevent fluid migration. These actions will result in a long-term reduction and eventual elimination of the potential for industrial discharges associated with oil and gas production, thereby supporting, rather than conflicting with, RWQCB requirements.

Given that the Project generates no new permanent sanitary or industrial wastewater and that temporary stormwater discharges during decommissioning will be regulated under the NPDES General Construction Permit, the Project will not exceed the wastewater treatment requirements of the applicable RWQCB.

Impact 5.19-2: Would the proposed Project require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? [Threshold U-2]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would generate sufficient new wastewater flows to require the construction of new wastewater treatment facilities or the expansion of existing facilities, the construction of which could cause significant secondary environmental effects.

The Project's core function is to prohibit new oil and gas wells and phase out existing oil and gas operations; it does not introduce new residential, commercial, or other land uses that would induce population growth or generate a long-term increase in sanitary wastewater.

During the temporary decommissioning phase, the on-site workforce will generate a negligible amount of wastewater, which will be managed via existing or self-contained portable sanitation facilities. This waste will be collected and disposed of by a licensed contractor at an appropriate

facility and will not be discharged to the public sewer system. Therefore, this temporary activity places no demand on local wastewater treatment providers such as the Los Angeles County Sanitation Districts (LACSD) or the City of Los Angeles Bureau of Sanitation (LABS).

Upon completion of decommissioning, the industrial use of the sites will have ceased. This will result in a long-term net reduction in potential wastewater generation compared to the baseline condition of active oil and gas operations. Because the Project does not generate any new permanent wastewater flows, it will not contribute to exceeding the existing capacity of any regional wastewater treatment facility. Consequently, the Project will not create the need for, or result in, the construction of new wastewater treatment facilities or the expansion of existing ones. Since no such construction would be required, no secondary environmental impacts associated with facility construction would occur.

Impact 5.19-3: Would the proposed Project result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? [Threshold U-3]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would create a wastewater demand that would cause a wastewater treatment provider to determine it has inadequate capacity to serve the Project in addition to its existing and projected commitments.

The Project does not propose any new development or land use that would generate a new permanent source of wastewater. Instead, it phases out an existing industrial use. The Project's only wastewater generation is associated with the small, temporary workforce required for decommissioning activities. This demand is minimal and will be managed entirely through the use of existing or self-contained portable sanitation facilities. The waste from self-contained units is collected by licensed private contractors and disposed of at an appropriate facility; it does not enter the public sewer system.

Because the Project contributes no new wastewater flows to the sewer system, it places no demand on the treatment capacity of regional providers like the Los Angeles County Sanitation Districts (LACSD) or the City of Los Angeles Bureau of Sanitation (LABS). In the long term, the cessation of oil and gas operations will result in a net reduction in potential wastewater demand compared to the existing baseline conditions.

Therefore, no wastewater treatment provider would determine that it has inadequate capacity to serve the Project's non-existent demand. The Project would not impede the ability of these providers to serve their existing customers or planned future growth.

Impact 5.19-4: Would the proposed Project require or result in the construction of new water facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? [Threshold U-4]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would create a new water demand sufficient to require the construction of new water facilities or the expansion of existing facilities, such as treatment plants, reservoirs, or pipelines, the construction of which could cause significant secondary environmental effects.

The Project's primary purpose is the phased cessation of an existing industrial land use; it does not introduce new residential, commercial, or agricultural uses that would generate a new, permanent water demand. The only water demand associated with the Project is the minimal and temporary use of water during decommissioning activities. This water would be used for non-potable purposes, primarily for dust control during the removal of equipment and site restoration.

This minor, short-term demand can be readily accommodated by the existing water supply and distribution infrastructure maintained by the various purveyors in the unincorporated areas. The demand is not sufficient to strain existing water treatment plant capacity or distribution systems.

In the long term, the cessation of oil and gas operations will result in a net reduction in water demand at the affected sites compared to the baseline condition. Active oil production can be a water-intensive use, and eliminating it will free up water resources, however minor.

Consistent with the programmatic findings of the CAP PEIR, because the Project does not create any new, permanent water demand, it will not require or result in the need to construct new water facilities or expand existing ones. Consequently, no secondary environmental impacts associated with the construction of such infrastructure would occur because of the Project.

Impact 5.19-5: Would the proposed Project not have sufficient water supplies available to serve the Project from existing entitlements and resources, necessitating new or expanded entitlements? [Threshold U-5]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would have a sufficient water supply available from existing entitlements and resources, or if it would necessitate the need for new or expanded entitlements.

The Project's water demand is limited to the minimal and temporary use of water for non-potable purposes, such as dust control, during the decommissioning of oil and gas facilities. The Project does not introduce any new permanent development or operational uses that would create a long-term water demand.

This minor, short-term demand can be readily met by the existing water supplies available to the various water purveyors serving the unincorporated areas of Los Angeles County. As detailed in the environmental setting, the region's water supply is a diverse portfolio of imported water, local groundwater, and recycled water, managed to ensure reliability even during dry years. The negligible demand from the Project's temporary decommissioning activities would not challenge the sufficiency of these supplies.

Because the Project creates no new permanent water demand, it will not require water providers to acquire new or expanded water supply entitlements. In fact, by ceasing oil and gas operations—which can be a water-intensive industrial use—the Project results in a long-term net reduction in water demand at the affected sites. This outcome is consistent with and supportive of regional goals for water conservation and long-term supply reliability.

Therefore, sufficient water supplies are available from existing entitlements and resources to serve the Project's temporary needs.

Impact 5.19-6: Would the proposed Project be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs? [Threshold U-6]

Less Than Significant Impact.

This analysis evaluates whether the solid waste generated by the Revised Oil Well Ordinance (Project) would exceed the permitted capacity of the landfills that serve the unincorporated areas of Los Angeles County.

Solid Waste Generation

The Project does not involve new development or population growth and therefore will not generate a new, permanent stream of municipal solid waste. Instead, the Project's solid waste generation is characterized by two distinct phases:

- Long-Term Operational Waste: By phasing out oil and gas operations, the Project will result in a long-term net reduction in the routine operational waste that would have otherwise been generated at these industrial sites.
- Short-Term Decommissioning Waste: A one-time, temporary volume of solid waste will be generated during the decommissioning of wells and associated infrastructure. This waste will primarily consist of construction and demolition (C&D) debris, such as scrap metal from tanks and pipelines, concrete from well pads and foundations, and other non-hazardous materials. The generation of this waste will be distributed over the 20-year amortization period as various facilities cease operations.

Landfill Capacity Analysis

As described in the environmental setting, Los Angeles County is served by a network of large regional landfills with substantial remaining capacity. The County, through its Integrated Waste Management Plan, ensures that at least 15 years of disposal capacity is identified and available, in compliance with state law (AB 939).

The temporary and phased generation of C&D debris from the Project will be readily accommodated by the existing capacity of this regional landfill system. The volume of waste generated at any given time is not anticipated to cause any landfill to exceed its permitted daily or total capacity.

Furthermore, a significant portion of the C&D debris generated is recyclable. In accordance with federal, state, and local regulations, including the County's Construction and Demolition Debris Recycling and Reuse Ordinance, materials such as metal and concrete will be diverted from landfill disposal for recycling. This mandatory diversion further reduces the Project's impact on landfill capacity.

Consistent with the programmatic findings of the CAP PEIR, because the Project's temporary waste generation is well within the capacity of regional landfills, and because the long-term effect is a reduction in solid waste, the Project will not be served by a landfill with insufficient capacity.

Impact 5.19-7: Would the proposed Project not comply with federal, state, and local statutes and regulations related to solid waste? [Threshold U-7]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would comply with all applicable federal, state, and local statutes and regulations related to solid waste.

All solid waste generated during the Project's temporary decommissioning phase must be handled, transported, and disposed of in accordance with the comprehensive regulatory framework governing solid waste in California and Los Angeles County. Key regulations include:

- Federal: The Resource Conservation and Recovery Act (RCRA), which governs the disposal of solid and hazardous waste.
- State: The California Integrated Waste Management Act of 1989 (AB 939), which mandates that local jurisdictions divert a significant portion of their waste stream from landfill disposal.
- Local: The Los Angeles County Integrated Waste Management Plan, the County's Source Reduction and Recycling Element (SRRE), and the County's Construction and Demolition (C&D) Debris Recycling and Reuse Ordinance.

Project activities will be required to comply with all of these regulations. Specifically, the C&D debris generated during the removal of oil and gas infrastructure will be subject to the County's C&D Debris Recycling and Reuse Ordinance. This ordinance requires that a large percentage of C&D materials, such as metal, concrete, and asphalt, be diverted from landfills through recycling

and reuse. Adherence to this ordinance ensures the Project is consistent with the state and local goals of waste reduction.

Furthermore, should any hazardous waste be encountered during decommissioning, it will be handled and disposed of in strict accordance with RCRA and California's Hazardous Waste Control Law. The performance standards included in the Project, such as those for Site Maintenance and Well Plugging and Abandonment, provide an enforceable mechanism to ensure that all materials and waste are managed properly.

Because compliance with these statutes is mandatory, and the Project includes no provisions that would conflict with them, the Project will be implemented in accordance with all applicable solid waste regulations.

Impact 5.19-8: Would the proposed Project increase demand for other public utilities (such as electricity, natural gas, or communication systems) to such an extent that it would require or result in the construction of new facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.? [Threshold U-8]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would increase demand for other public utilities—specifically electricity, natural gas, and communication systems—to an extent that would require the construction of new facilities or the expansion of existing facilities.

Electricity and Natural Gas

The Project does not involve new development or population growth that would create a new, permanent demand for energy. The Project's energy consumption is characterized by two phases:

- Temporary Decommissioning Demand: During the short-term decommissioning of oil and gas facilities, there will be a temporary demand for electricity and fuel (such as diesel or natural gas) to power heavy machinery and equipment. This temporary demand can be readily served by the existing infrastructure of Southern California Edison (SCE) and Southern California Gas Company (SoCalGas), the primary energy purveyors in the unincorporated areas. This minor, short-term load will not strain the existing energy grid or pipeline network.
- Long-Term Demand Reduction: Active oil and gas production is an energy-intensive industrial use, requiring substantial and continuous electricity and natural gas to power pumps, compressors, and other processing equipment. By phasing out these operations, the Project will result in a permanent net reduction in energy consumption at the affected sites compared to the baseline. This is a beneficial effect on the regional energy system.

Consistent with the findings of the CAP PEIR, because the Project's temporary energy demand is minimal and the long-term effect is a significant reduction in demand, the Project will not require or result in the construction of new power plants, transmission lines, substations, or natural gas pipelines, nor will it require the expansion of any such existing facilities.

Communication Systems

Similarly, the Project will not adversely impact communication systems. The temporary workforce on decommissioning sites will have negligible demand that can be met by existing commercial mobile phone and data networks. The long-term cessation of oil and gas operations will eliminate any need for dedicated industrial communication systems (e.g., SCADA systems) at these sites. The Project will not require the construction of new communication facilities or the expansion of existing networks.

5.19.4 Cumulative Impacts

This section evaluates the potential for the Revised Oil Well Ordinance (Project), in conjunction with other past, present, and reasonably foreseeable future projects, to result in a significant cumulative impact on utilities and service systems. The geographic scope for this analysis encompasses the service areas of the major utility providers in Los Angeles County. The cumulative context includes numerous residential, commercial, and industrial development projects throughout the region that will collectively increase long-term demand for water, wastewater, solid waste, and energy services.

Wastewater

Cumulative development across Los Angeles County will increase the overall volume of wastewater requiring treatment. However, the Project will not contribute to this cumulative increase. As established in the impact analysis, the Project generates no new permanent wastewater flows. Its long-term effect is a net reduction in potential wastewater demand as industrial operations cease. Therefore, the Project's contribution is not cumulatively considerable; rather, it provides a minor beneficial effect by reducing the overall load on regional wastewater systems.

Water Supply

Cumulative growth will continue to place significant demand on the region’s complex water supply system. The Project’s contribution to this cumulative demand is negligible. The water required for temporary decommissioning activities is minimal and will be served by existing supplies without impacting regional reliability. The long-term effect of the Project is a permanent reduction in water demand by eliminating a water-intensive industrial use. This outcome supports regional water conservation goals. As such, the Project's contribution to cumulative impacts on water supply is not considerable and is, in fact, beneficial.

Solid Waste

Cumulative development will increase the generation of ongoing municipal solid waste, placing continued demand on regional landfill capacity. The Project's only adverse contribution to this

cumulative scenario is the temporary, one-time generation of C&D debris during decommissioning. This waste generation will be spread over a 20-year amortization period, and a significant portion will be diverted from landfills per County ordinance. In the context of the millions of tons of waste managed by regional landfills annually, this temporary contribution is minor and will not exhaust landfill capacity. In the long term, the Project has a beneficial cumulative effect by eliminating the ongoing operational waste stream from the industrial facilities. Therefore, the Project's contribution to cumulative solid waste impacts is not cumulatively considerable.

Other Utilities and Service Systems (Energy)

Cumulative regional growth will increase demand for electricity and natural gas. The Project's temporary energy use during decommissioning is minor and will be accommodated by existing infrastructure. The long-term effect of ceasing energy-intensive oil and gas operations is a permanent reduction in energy demand at the affected sites. This reduction provides a beneficial contribution to the cumulative energy scenario by freeing up capacity on the electrical grid and natural gas network. The Project's contribution is therefore not cumulatively considerable.

5.19.5 Level of Significance Before Mitigation

Based on the analysis presented in Section 5.19.3, all potential impacts on utilities and service systems would be less than significant.

The Project does not generate new, permanent demands for wastewater treatment, water supply, solid waste disposal, or energy services. The temporary requirements during the decommissioning phase are minimal and can be readily accommodated by existing facilities and service systems without causing them to exceed their capacities. In the long term, the Project (via the mandates in PDF-LU-1 and PDF-LU-2) results in a beneficial net reduction in demand on these systems by permanently ceasing an industrial land use. Therefore, no significance thresholds would be exceeded.

5.19.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to utilities and service systems.

This finding is based on the Project's built-in mandates (PDF-LU-1 and PDF-LU-2) which ensure a beneficial long-term reduction in utility demand, as well as mandatory compliance with existing regulatory frameworks governing temporary water use, wastewater, and solid waste (such as the County's Construction and Demolition Debris Recycling and Reuse Ordinance). Because the Project does not result in significant impacts to utilities and service systems, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.19.7 Level of Significance After Mitigation

As established in Section 5.19.5, all impacts on utilities and service systems are less than significant before mitigation. Because no mitigation measures are required, the level of significance remains less than significant.

5.19.8 References

California Department of Water Resources (DWR). Various Years. Urban Water Management Plans (UWMPs) for water agencies in Los Angeles County.

California Energy Commission (CEC). Various Years. Integrated Energy Policy Report.

California Public Utilities Commission (CPUC). General Order 112-E, Rules Governing Design, Construction, Testing, Maintenance and Operation of Utility Gas Gathering, Transmission and Distribution Piping Systems.

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Las Virgenes Municipal Water District (LVMWD). 2013. Tapia Water Reclamation Facility.

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Los Angeles County Code, Title 20, Chapter 20.87, Construction and Demolition Debris Recycling and Reuse.

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Los Angeles County Sanitation Districts (LACSD). 2014. Wastewater Treatment Plant Flow Data.

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State of California. California Green Building Standards Code, Title 24, Part 11 (CALGreen).

State of California. California Integrated Waste Management Act of 1989 (AB 939).

State of California. Porter-Cologne Water Quality Control Act.

State of California. Urban Water Management Planning Act.

United States Congress. Clean Water Act (CWA).

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CHAPTER 5.20 WILDFIRE

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance and well abandonment that govern the decommissioning process.

From a wildfire perspective, the Project is expected to result in two primary types of effects. The first are the short-term risks associated with decommissioning activities, which will sometimes occur in areas designated as Very High Fire Hazard Severity Zones (VHFHSZs) and involve equipment that could be a potential source of ignition. The second effect is the long-term outcome resulting from the permanent removal of industrial oil and gas infrastructure, which eliminates ongoing operational fire hazards and flammable materials from these high-risk areas.

This section analyzes the potential for the Project to result in significant impacts related to wildfire, evaluating whether the Project would impair emergency response plans, exacerbate existing fire risks, or expose people and structures to post-fire hazards like flooding and landslides. The analysis is based on information from the Los Angeles County General Plan Safety Element, data from the California Department of Forestry and Fire Protection (CAL FIRE), and County of Los Angeles GIS data identifying Fire Hazard Severity Zones. All sources used in this analysis are listed in Section 5.20.8, References.

Comments received from the City of Culver City and The Termo Company raised concerns about the potential for the project to increase wildfire risk. As summarized in Table 2-1: Summary of Scoping Comments Received, these comments noted that many oil fields are located in Very High Fire Hazard Severity Zones and that decommissioning activities, as well as the potential for the land to remain vacant without ongoing maintenance, could create new fire hazards for surrounding communities. This chapter considers these comments and analyzes the project's potential impacts related to wildfire risk.

5.20.1 Environmental Setting

5.20.1.1 Regulatory Setting

Federal Regulations, Policies, and Plans

While direct federal land-use authority over wildfire management on non-federal lands is limited, a framework of federal regulations and policies governs workplace safety, industrial hazard prevention, and inter-agency fire management coordination. These are directly relevant to the decommissioning of oil and gas facilities required by the Project, particularly for activities involving flammable materials and those occurring near federal lands.

Occupational Safety and Health Administration (OSHA)

The U.S. Occupational Safety and Health Administration (OSHA) establishes and enforces mandatory, nationwide standards to ensure safe and healthful working conditions. For the Project, OSHA regulations are directly applicable to all contractors and workers performing decommissioning activities. Key standards include:

- Fire Prevention Plans (29 CFR 1910.39): This standard requires employers to have a written fire prevention plan that identifies all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard.
- Flammable Liquids (29 CFR 1910.106): This standard sets specific requirements for the handling, storage, and use of flammable and combustible liquids, which is directly relevant to managing residual petroleum products during the removal of tanks and pipelines.

Compliance with all applicable OSHA standards is mandatory for any work conducted under the Project, providing a foundational level of fire safety at each decommissioning site.

U.S. Environmental Protection Agency (USEPA)

The USEPA regulates facilities that handle hazardous and flammable substances to prevent accidental releases, including fires and explosions, primarily through the Clean Air Act. The General Duty Clause of the Clean Air Act requires owners and operators of facilities that have regulated substances to identify hazards and design and maintain a safe facility to prevent releases. These federal requirements inform the safety protocols that must be followed when handling and removing residual flammable materials from oil and gas sites during decommissioning.

Federal Wildland Fire Management Policy and National Fire Plan

The Federal Wildland Fire Management Policy was developed by a multi-agency group to coordinate fire management across federal jurisdictions. Similarly, the National Fire Plan was developed to manage the impacts of wildfire on communities and ensure sufficient firefighting capacity.

While not direct regulations applied to private land, these policies are relevant to the Project because they establish the guiding principles for coordination between federal agencies (like the U.S. Forest Service, which manages the Angeles National Forest) and state and local agencies

(like LACoFD). For any decommissioning sites located at the wildland-urban interface near federal lands, these policies provide the framework for a unified and cooperative response in the event of a fire incident. The primary guiding principle in all activities is firefighter and public safety.

National Consensus Codes and Standards (NFPA and IFC)

The National Fire Protection Association (NFPA) and the International Code Council (ICC) are private organizations that develop consensus-based model codes and standards that are widely adopted into law by state and local governments. The NFPA develops over 300 codes and standards that provide nationally accepted best practices for fire protection. The International Fire Code (IFC), developed by the ICC, provides a comprehensive model code for fire prevention related to hazardous materials and building design.

While these are not federal regulations in themselves, they are critically important because the California Fire Code (CFC) and the Los Angeles County Fire Code are based on and adopt large portions of the IFC and NFPA standards. Therefore, their requirements for handling flammable materials, managing ignition sources, and ensuring site safety during industrial activities will be made mandatory and enforceable on all Project decommissioning sites through local fire code adoption.

Summary of Federal Wildfire Considerations

The federal government's primary role in regulating the Project's wildfire risk is not through direct land use control but by establishing mandatory nationwide standards for industrial and worker safety. The key federal considerations for this Project are the Occupational Safety and Health Administration (OSHA) and U.S. Environmental Protection Agency (USEPA) regulations, which will govern the safe handling of all flammable and hazardous materials during decommissioning activities.

Additionally, federal wildland fire policies provide the crucial framework for inter-agency coordination, which is essential for sites located near federal lands like the Angeles National Forest. While model codes like the IFC and NFPA are not federal law, their standards are made legally binding through adoption into the California and Los Angeles County Fire Codes.

State Regulations, Policies, and Plans

California has a multi-layered regulatory and planning framework for wildfire that includes state agencies with direct oversight, legally enforceable statewide codes, hazard mapping mandates, and systems for emergency response coordination. This framework provides the primary set of safety standards that will govern all decommissioning activities required by the Project.

California Fire Code (CFC)

The CFC (California Code of Regulations, Title 24, Part 9) establishes the minimum requirements to safeguard public health and safety from fire and explosion hazards on all properties. The County of Los Angeles has adopted the 2022 CFC with local amendments, making its provisions legally enforceable on all Project sites. The CFC is the most direct and important regulation for the Project's activities, as it includes specific, mandatory requirements for:

- Vegetation management and defensible space around work areas.
- Safe access for fire department apparatus.
- On-site fire suppression equipment (e.g., fire extinguishers).
- Safety protocols for "hot work" like welding or grinding.
- Proper storage and handling of flammable liquids.

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE is the state's primary fire agency, responsible for fire suppression and prevention in State Responsibility Areas (SRAs). CAL FIRE also plays a central role in classifying wildfire risk throughout the state by mapping Fire Hazard Severity Zones (FHSZs). These maps are critical as they determine where more stringent fire safety standards apply, which is directly relevant for any decommissioning work occurring within these designated high-hazard zones.

- Office of the State Fire Marshal (OSFM): The OSFM is a part of CAL FIRE that focuses on fire prevention. It develops and enforces the regulations contained within the California Fire Code, which provides the primary, on-the-ground safety standards for the Project's decommissioning activities.
- Fire Hazard Severity Zone (FHSZ) Mapping: State law, through California Government Code (§51175-51189) and Public Resources Code (§4201-4204), directs CAL FIRE to map areas with significant fire hazards based on factors like fuel, terrain, and weather. These official FHSZ maps are then used by local agencies to designate Very High Fire Hazard Severity Zones (VHFHSZs). The significance of these maps for the Project is that they trigger the application of stricter safety standards under the California Fire Code for any decommissioning work performed within these zones.

California Occupational Safety and Health Administration (Cal/OSHA)

Cal/OSHA is responsible for ensuring worker safety and has extensive, mandatory regulations detailed in Title 8 of the California Code of Regulations. All contractors performing decommissioning work under the Project must comply with Cal/OSHA standards for fire safety, which include requirements for an Injury and Illness Prevention Program (IIPP), fire prevention plans, and specific safety protocols for hazardous activities like "hot work" (welding and cutting) and the handling of flammable and combustible materials.

California Geologic Energy Management Division (CalGEM)

CalGEM is the state agency responsible for regulating oil and gas operations. Its regulations for well plugging, abandonment, and site restoration are directly related to long-term fire hazard reduction. Proper well sealing prevents the uncontrolled release of flammable gases, and site cleanup requirements ensure that potentially hazardous materials are removed.

State Hazard Mitigation and Strategic Fire Plans

California's State Hazard Mitigation Plan (SHMP) and Strategic Fire Plan are high-level planning documents that set goals for reducing wildfire risk and creating more fire-resilient communities. The long-term outcome of the Project—the removal of industrial infrastructure and flammable materials from hundreds of sites, many in high-hazard zones—is consistent with the goals of these state plans.

Emergency Response and Mutual Aid

The state's emergency response framework is built on a system of mutual aid, governed by the California Master Mutual Aid Agreement. This system, managed through the Standardized Emergency Management System (SEMS), ensures that in the event of a fire at a decommissioning site, a coordinated response from multiple agencies (e.g., LA County Fire, city fire departments, CAL FIRE, U.S. Forest Service) can be rapidly deployed. The Los Angeles Regional Interoperable Communications System (LA-RICS) provides the modern communication backbone to facilitate this seamless inter-agency response in Los Angeles County.

Summary of State Wildfire Considerations

The most relevant state regulations for the Project are the legally enforceable safety standards contained within the California Fire Code (CFC), which the County has adopted. The CFC provides the specific, on-site rules for fire prevention during all decommissioning activities.

State agency oversight provides multiple layers of safety. CAL FIRE is responsible for mapping the Fire Hazard Severity Zones that trigger the CFC's stricter requirements. Cal/OSHA sets mandatory, worksite-specific fire safety and prevention standards for all contractors, while CalGEM's regulations ensure that the well abandonment process itself reduces long-term fire hazards.

Finally, statewide planning documents guide long-term risk reduction goals, and the established Mutual Aid system ensures that a coordinated, multi-agency emergency response is available for any incident.

Local Regulations, Policies, and Plans

The primary local authority for wildfire protection in the unincorporated areas is the Los Angeles County Fire Department (LACoFD). The Department's authority is guided by the policy direction of the County General Plan and implemented through the legally enforceable regulations of the Los Angeles County Code. This local framework provides the direct, on-the-ground safety requirements for all decommissioning activities under the Project.

County of Los Angeles General Plan

The General Plan Safety Element is the overarching policy document for protecting communities from natural and human-caused hazards, including wildfire. The primary goal is to minimize the risk of death, injury, property damage, and economic and social dislocation resulting from fire hazards. The long-term outcome of the Project—the removal of industrial infrastructure and associated flammable materials from high-hazard areas—is consistent with the General Plan's core objective of reducing community vulnerability to wildfire. Relevant General Plan goals and policies include:

- Goal S 4: An effective regulatory system that prevents or minimizes personal injury, loss of life, and property damage due to fire hazards.
    - Policy S 4.4: Reduce the risk of wildland fire hazards through meeting minimum state and local regulations for fire-resistant building materials, vegetation management, fuel modification, and other fire hazard reduction programs.
    - Policy S 4.16: Require local development standards to meet or exceed SRA Fire Safe Regulations, which include visible home and street addressing and signage and vegetation clearance maintenance on public and private roads; all requirements in the California Building Code and Fire Code; and Board of Forestry Fire Safe Regulations.
    - Policy S 4.17: Coordinate with agencies, including the Fire Department and ACWM, to ensure that effective fire buffers are maintained through brush clearance and fuel modification around developments.
    - Policy S 4.19: Ensure all water distributors providing water in unincorporated Los Angeles County identify, maintain, and ensure the long-term integrity of future water supply for fire suppression needs, and ensure that water supply infrastructure adequately supports existing and future development and redevelopment, and provides adequate water flow to combat structural and wildland fires, including during peak domestic demand periods.
- Goal S 7: Effective County emergency response management capabilities.
    - Policy S 7.1: Ensure that residents are protected from the public health consequences of natural or manmade disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
    - Policy S 7.2: Support County emergency providers in reaching their response time goals.
    - Policy S 7.3: Coordinate with other County and public agencies, such as transportation agencies and health-care providers on emergency planning and response activities, and evacuation planning.
    - Policy S 7.5: Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- Conservation and Natural Resources Element
    - Policy C/NR 13.8: Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.

Los Angeles County Code

The County Code contains the specific, mandatory regulations that will govern all fire-safety aspects of the Project's decommissioning work.

- Title 32, Fire Code: This is the most critical local regulation for the Project. The County has adopted the 2022 California Fire Code with local amendments, making it legally binding. Title 32 empowers the LACoFD to enforce stringent fire prevention measures, particularly in designated hazardous fire

areas. For decommissioning activities, especially those within Very High Fire Hazard Severity Zones (VHFHSZs), the Fire Code mandates:

- Vegetation Clearance (Weed Abatement): Strict requirements for clearing flammable brush and grass to maintain defensible space around all structures and work areas.
- Fire Apparatus Access: Ensuring that roads leading to and on the work sites are wide enough, structurally sound, and clear of obstructions for fire engine access.

- On-Site Safety Protocols: Regulations governing "hot work" like welding, requiring spark arrestors on equipment, and mandating the presence of on-site fire suppression equipment.

- Title 22, Planning and Zoning: Chapter 22.104, the Hillside Management Area (HMA) ordinance, contains regulations to preserve the integrity of steep hillsides. While the Project does not involve new development that would require an HMA permit, these regulations underscore the heightened need for careful site management and erosion control during decommissioning activities in steep terrain, which often coincides with high fire hazard areas.

- Title 26, Building Code: Chapter 7 of the building code regulates fire-resistant construction. Although not directly applicable to the demolition of industrial equipment, its standards inform the safety requirements for any temporary structures or trailers used during the decommissioning phase.

Countywide Planning and Response

LACoFD Strategic Plan: The Fire Department's 2021 Strategic Plan outlines its operational goals, including analyzing wildfire threats in the Wildland-Urban Interface (WUI), implementing fuel reduction projects, and developing community protection strategies. This plan provides the strategic context within which the LACoFD will review and enforce fire safety measures for the Project's decommissioning activities.

Emergency Planning and Response: The Los Angeles County Office of Emergency Management (OEM) is responsible for countywide disaster planning and maintains the Operational Area Emergency Response Plan. This plan, combined with the state-level mutual aid agreements, ensures that a robust, multi-agency response is in place to manage any potential fire incident at a Project site. The Los Angeles Regional Interoperable Communication System (LA-RICS) serves as the critical communication infrastructure that allows fire, law enforcement, and other emergency personnel from different agencies to communicate seamlessly during a large-scale incident.

Summary of Local Wildfire Considerations

The most important local regulation for the Project is the legally enforceable Los Angeles County Fire Code (Title 32), which will govern all on-site fire safety measures during decommissioning activities.

The General Plan Safety Element provides the overarching policy goal of minimizing wildfire risk, with which the Project's long-term outcome is consistent. Other sections of the County Code, such as the Hillside Management Area (HMA) Ordinance, provide additional context and underscore the need for careful site management in high-hazard areas.

Finally, the County's established Operational Area Emergency Response Plan ensures that a coordinated, multi-agency response, supported by the LA-RICS communication system, is in place to manage any potential fire incident.

5.20.1.2 Existing Environmental Conditions

This section describes the existing environmental conditions related to wildfire hazards in the unincorporated areas of Los Angeles County where oil and gas facilities are located. The potential for a wildfire to occur and spread is determined by three principal factors: topography, climate and weather, and vegetation (fuel). These existing conditions provide the baseline context for analyzing the Project's potential impacts on wildfire risk.

The unincorporated areas of Los Angeles County encompass a diverse range of landscapes, from flat coastal plains and desert floors to steep, rugged mountain ranges. The region's Mediterranean climate, characterized by hot, dry summers and cool, wet winters, creates a long fire season. This is often exacerbated by seasonal Santa Ana winds, which are strong, extremely dry down-slope winds that can turn a small spark into a major conflagration.

As a result of these factors, significant portions of the unincorporated County are designated by CAL FIRE and the Los Angeles County Fire Department as Very High Fire Hazard Severity Zones (VHFHSZs). These high-risk areas are concentrated in the Wildland-Urban Interface (WUI) where communities are built adjacent to flammable vegetation, including the Santa Monica Mountains, the foothills of the Angeles National Forest, the Santa Clarita Valley, and the Baldwin Hills. Several existing oil and gas facilities are located within these VHFHSZs.

The existing conditions also include a well-established, multi-agency emergency response system led by the Los Angeles County Fire Department (LACoFD), which provides fire suppression and prevention services throughout the unincorporated areas.

Fire Hazard Severity Zones (FHSZs)

FHSZs are areas mapped by CAL FIRE based on a scientific model that assesses wildfire hazards according to fuel, terrain, weather, and other relevant factors, as required by state law. These zones, which range from moderate to very high, are the primary tool used by state and local agencies to identify areas where stricter fire safety regulations are needed. The financial responsibility for fire suppression divides these lands into three categories:

- Federal Responsibility Areas (FRAs): These are federal lands, such as the Angeles National Forest, where the federal government is responsible for fire suppression.
- State Responsibility Areas (SRAs): In these areas, typically unincorporated wildlands, the state (through CAL FIRE) is financially responsible for suppressing wildfires.
- Local Responsibility Areas (LRAs): These are incorporated cities and specific unincorporated areas where the local government (like the Los Angeles County Fire Department) is responsible for fire

suppression. For LRAs, CAL FIRE recommends areas for designation as Very High Fire Hazard Severity Zones (VHFHSZs), which the County must then officially designate by ordinance.

For the Project, the most relevant designations are the VHFHSZs within the LRAs. Numerous oil and gas facilities subject to the Project's decommissioning requirements are located within these zones in areas like the Baldwin Hills, Santa Clarita Valley, and the foothills of the San Gabriel Mountains. This designation is critical because it legally triggers the application of the most stringent fire prevention requirements of the Los Angeles County Fire Code for any decommissioning activities taking place within them.

Fire History

Fire history data provides valuable information regarding fire frequency, ignition sources, and vegetation patterns, which helps in pre-planning for future wildfire events. While California has a long history of wildfires, recent fires are burning with greater speed and intensity due to prolonged drought and rising global temperatures. An analysis of recent, severe wildfires provides critical context for understanding the existing risk in Los Angeles County. While numerous fires occur annually, several recent events stand out due to their size, destruction, and proximity to the unincorporated communities where oil and gas facilities are located.

- The Woolsey Fire (2018): Originating in Ventura County, this devastating fire burned into Los Angeles County, sweeping through the Santa Monica Mountains to the Pacific Ocean. It destroyed 1,643 structures, damaged another 364, and burned a total of 96,949 acres. The fire directly impacted the unincorporated communities of the Santa Monica Mountains, demonstrating the extreme fire risk in that VHFHSZ.
- The Bobcat Fire (2020): This was one of the largest fires in Los Angeles County history, burning 115,796 acres primarily within the Angeles National Forest. It threatened several foothill communities in the San Gabriel Valley, including unincorporated Altadena, forcing widespread evacuations. The fire destroyed 171 structures, including historic cabins and the nature center at the Devil's Punchbowl Natural Area.
- The Lake Fire (2020): Burning north of Santa Clarita near Lake Hughes, this fire consumed 31,089 acres of forest and brushland. It destroyed 33 structures and demonstrated the high fire risk in the rural, northern unincorporated areas of the county.
- The Eaton and Palisades Fires (2025): These devastating, uniquely severe wildfires were dictated by extreme and erratic winds. These winds grounded all firefighting aircraft shortly after the fires began, severely limiting situational awareness and the ability to fight the spread. The Eaton Fire caused devastating losses, with 9,418 structures destroyed, 1,073 structures damaged, and 17 confirmed fatalities. At the same time, the Palisades fire led to widespread evacuations in Pacific Palisades and nearby areas. The Palisades Fire burned over 23,000 acres, destroyed nearly 7,000 structures, and resulted in 12 fatalities, becoming the most destructive fire in the history of the City of Los Angeles.

Vegetation and Land Covers

Wildfire behavior is strongly influenced by the type, moisture, and arrangement of vegetation, which acts as fuel. In Los Angeles County, thousands of homes have been lost due to the highly

flammable nature of the native and non-native vegetation surrounding them. The unincorporated areas contain several fire-adapted plant communities that pose a significant fire hazard, especially during dry conditions and Santa Ana wind events.

- Chaparral: This is the most widespread and flammable vegetation community in the region's mountains. It consists of dense, woody, evergreen shrubs that are rich in flammable oils. It covers vast portions of the Angeles National Forest and the Santa Monica Mountains.
- Coastal Sage Scrub: Found at lower elevations and on drier slopes, including in the Baldwin Hills and Puente Hills, this community consists of smaller, drought-deciduous shrubs that are also highly flammable.
- Grasslands: Non-native annual grasslands are common throughout the unincorporated areas at lower elevations and in disturbed areas, often intermixed with scrublands. These grasses dry out early in the fire season and can carry fire with extreme speed, especially when driven by wind.

Vegetation Management and Fuel Modification

To mitigate the risk posed by these fuel types, various agencies conduct broad-scale vegetation management, particularly at the Wildland-Urban Interface (WUI). Locations in the Project Area subject to these fire prevention measures include:

- The Angeles National Forest: The U.S. Forest Service conducts landscape-scale fuel management projects, including prescribed burns and mechanical thinning, on federal lands to reduce the threat to the foothill communities.
- High Hazard Zones (Countywide): The Los Angeles County Fire Department (LACoFD) requires mandatory fuel modification zones around structures in VHFHSZs. This involves clearing, thinning, and irrigating vegetation to create a buffer of defensible space. These requirements will be applicable to all decommissioning activities occurring within these zones.

Wildland-Urban Interface

Wildfire is a continuous threat in Southern California and is particularly concerning in the Wildland-Urban Interface (WUI), the geographic area where urban development either abuts or intermingles with wildland or vegetative fuels. In Los Angeles County, the WUI is extensive and varied, ranging from dense hillside neighborhoods built directly against chaparral slopes to suburban communities interspersed with grassy open spaces.

The primary hazard in the WUI is the direct exposure of homes and infrastructure to flames and embers from wildfire. The risk is reciprocal: not only does the wildland threaten the community, but human activity within the WUI is a frequent cause of wildland fire ignitions.

Many of the unincorporated areas where oil and gas facilities are located are classic examples of the WUI. This includes:

- The Baldwin Hills, where residential neighborhoods are built directly adjacent to the grassy slopes of the oil field and Kenneth Hahn State Recreation Area.
- The foothill communities of the San Gabriel Valley, which abut the Angeles National Forest.
- The canyons of the Santa Monica Mountains and Santa Clarita Valley, where homes and infrastructure are interspersed with highly flammable chaparral and scrub.

A significant number of the facilities subject to the Revised Oil Well Ordinance are located within these WUI areas, underscoring the importance of the strict fire safety regulations that govern any activities, including decommissioning, in these high-risk zones.

Fire Protection

The Los Angeles County Fire Department (LACoFD) is the primary agency providing fire protection, suppression, and emergency medical services to the 4.1 million residents of the 59 contract cities and all unincorporated areas of the County, including the Project area. The Department's vast service area covers 2,311 square miles and is managed through an organizational structure of three regions (North, Central, and East), nine divisions, and 22 battalions. As of 2021, the LACoFD operated 177 fire stations with a force of 4,775 personnel.

The LACoFD's resources include 288 engine companies, 112 paramedic units, and 34 truck companies. In addition to traditional fire suppression, the Department provides a wide range of specialized services through its various divisions, including:

- Emergency medical services
- Hazardous materials response
- Swift water rescue
- Urban search and rescue
- Lifeguard services
- Air and wildland fire suppression

Wildfire Responsibilities and Response Standards

As a CAL FIRE contract county, the LACoFD is responsible for implementing the State Strategic Fire Plan and providing wildland fire protection on State Responsibility Areas (SRAs) within its jurisdiction. The Department must address major fire hazards, including the increasing frequency and duration of wildfires in the WUI.

To ensure adequate service levels across its diverse geography, the LACoFD adheres to the following response time standards, as identified in the General Plan EIR:

- Urban areas: 5 minutes or less
- Suburban areas: 8 minutes or less
- Rural areas: 12 minutes or less

Overall emergency planning and coordination for the region is led by the Los Angeles County Office of Emergency Management (OEM), which maintains the County's Operational Area Emergency Response Plan and All-Hazards Mitigation Plan.

5.20.2 Thresholds of Significance

In accordance with the County's Environmental Checklist Form (Initial Study) and Appendix G of the State CEQA Guidelines, the applicable thresholds of significance regarding wildfire are listed below. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the project may have a significant impact if it would:

WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.

WF-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

WF-3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

WF-5 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

5.20.3 Environmental Impacts

5.20.3.1 Methodology

Pursuant to CEQA Guidelines Section 15152, this analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the implementation of Measure ES1 (Develop a Sunset Strategy for All Oil and Gas Operations). The CAP PEIR recognized that while phasing out fossil fuel infrastructure reduces long-term fire hazards, the physical decommissioning of infrastructure involves heavy equipment that poses a temporary ignition risk in fire-prone areas. The CAP PEIR determined that these temporary impacts are fully mitigated to a less-than-significant level through mandatory regulatory compliance with the California Fire Code, CAL FIRE regulations, and local fire agency oversight (CAP PEIR, Chapter 3.20). This analysis evaluates the Project’s direct wildfire implications to ensure consistency with the CAP PEIR's findings that the phase-out of fossil fuels ultimately improves public safety. Because the Project's temporary decommissioning risks are strictly managed by existing regulations (such as the Los Angeles County Fire Code and Cal/OSHA standards) and the Project's enforceable Project Design Features (PDFs), this analysis focuses on demonstrating why programmatic mitigation measures from the CAP PEIR are not required.

The evaluation of wildfire impacts is based on a systematic analysis of existing environmental hazards, the nature of the Project's specific activities, and the established regulatory framework for fire safety in Los Angeles County.

This assessment is a qualitative review that considers the location of oil and gas facilities in relation to designated fire hazard zones and evaluates the potential for decommissioning activities to exacerbate fire risk. The methodology considers:

- The existing fire hazard conditions, including the location and extent of Very High Fire Hazard Severity Zones (VHFHSZs), local topography, flammable vegetation communities, and climatic factors like Santa Ana winds.
- The nature of the Project's activities, including the temporary, short-term ignition risks associated with decommissioning work and the long-term removal of industrial infrastructure and flammable materials from high-hazard areas.
- The existing emergency response and evacuation infrastructure and whether Project activities could impair access or interfere with adopted plans.
- The potential for the Project to expose people or structures to post-fire hazards such as landslides or flooding by altering slopes or drainage.

Sources of information for this analysis include:

- GIS data from CAL FIRE and the County of Los Angeles detailing the boundaries of FHSZs.
- The Los Angeles County General Plan Safety Element and the Los Angeles County Code, particularly Title 32 (Fire Code).
- Appendix A of this EIR, which inventories the location of existing oil and gas facilities.
- Aerial imagery to assess the Wildland-Urban Interface (WUI) context of the Project sites.

This methodology is consistent with CEQA Guidelines Appendix G and evaluates the Project's temporary activities and long-term outcomes against existing environmental hazards and mandatory fire safety regulations.

5.20.3.2 Proposed Project Characteristics

The Revised Oil Well Ordinance is a countywide initiative that will amend the Los Angeles County Code and the County General Plan to prohibit new oil wells and designate existing oil wells and production facilities as nonconforming uses, subject to a 20-year amortization period. Once nonconforming, oil production facilities must cease operations and be decommissioned in accordance with established performance standards.

Wildfire-related project characteristics include:

- Elimination of New Industrial Fire Hazards: By prohibiting new oil wells, the Project prevents the future introduction of industrial ignition sources and flammable materials into the landscape, including high-hazard areas.
- Required Decommissioning of Existing Facilities: The Project mandates the permanent removal of existing oil and gas infrastructure. This is relevant to wildfire risk because it eliminates long-term, on-

site ignition sources (e.g., mechanical equipment) and large quantities of flammable and combustible petroleum products.

- Performance Standards for Fire Safety: The Project's Site Maintenance standards require operators to clear flammable materials, including weeds and dry brush, from around wells and production facilities, actively reducing on-site fuel loads during the amortization period.
- Application in High Fire Hazard Areas: The ordinance applies to existing oil and gas facilities in the unincorporated areas, including numerous sites located within designated Very High Fire Hazard Severity Zones (VHFHSZs) such as the Santa Monica Mountains, the Santa Clarita Valley, and Baldwin Hills.
- No New Habitable Structures or Population: The Project does not involve the construction of new homes or businesses. It does not increase the number of people or structures permanently located in high fire hazard areas.

Overall, the Project's primary effect on wildfire risk involves two phases. There is a short-term, temporary potential for ignition risk associated with the use of heavy equipment during decommissioning activities, which will be managed by strict adherence to the County Fire Code. The long-term effect is the permanent removal of industrial fire hazards from the landscape.

Subsequent sections provide an evaluation of the Revised Oil Well Ordinance's impacts relative to each of the CEQA significance thresholds for wildfire.

5.20.3.3 Impact Analysis

The Revised Oil Well Ordinance (the Project) establishes a comprehensive regulatory framework to prohibit the development of new oil wells and to phase out existing oil production facilities within unincorporated Los Angeles County. Under the Project, existing oil wells and associated infrastructure will be designated as nonconforming uses and required to cease operations in accordance with a 20-year amortization schedule. The Project also includes enforceable performance standards for site maintenance and well abandonment that govern the decommissioning process.

From a wildfire perspective, the Project is expected to result in two primary types of effects:

Short-term, temporary ignition risks, which may occur during the decommissioning of existing facilities. These risks are associated with the use of vehicles and heavy equipment, including "hot work" like welding or cutting metal, particularly in Very High Fire Hazard Severity Zones (VHFHSZs). Such risks would be localized, of limited duration, and managed through mandatory compliance with the Los Angeles County Fire Code.

Long-term changes to the Wildland-Urban Interface (WUI) resulting from the permanent removal of industrial infrastructure. This includes the elimination of potential ignition sources (e.g., malfunctioning equipment) and on-site flammable materials (petroleum products) from hundreds of sites, many of which are in high-hazard areas.

This section evaluates the Project's impacts relative to each of the applicable CEQA significance thresholds for wildfire identified in Section 5.20.2. The analysis considers both the temporary and permanent effects of implementation, accounting for the location of facilities in designated high-hazard zones and the mandatory application of federal, state, and local fire safety regulations.

Impact 5.20-1: Would the proposed Project substantially impair an adopted emergency response plan or emergency evacuation plan? [Threshold WF-1]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would physically interfere with or otherwise substantially impair an adopted emergency plan. The primary plan for the region is the Los Angeles County Operational Area Emergency Response Plan, which is maintained by the County's Office of Emergency Management (OEM) and identifies critical emergency access and evacuation routes.

The Project's physical activities are limited to the temporary decommissioning of existing oil and gas facilities over a 20-year period. These activities will involve work crews, heavy equipment, and truck trips for debris removal at the individual sites. While these activities could temporarily increase traffic on local roads that may also serve as emergency routes, they would not result in the permanent closure or alteration of any roadway.

Any work that requires temporary lane closures or could otherwise affect traffic on a public right-of-way would be subject to review and permitting by County Public Works, which would require the implementation of a Traffic Management Plan. Such a plan would mandate measures to ensure that adequate access for emergency vehicles is maintained at all times. These measures could include using flaggers, scheduling work during off-peak hours, and ensuring roadway clearance.

Consistent with the programmatic findings of the CAP PEIR, because these potential impacts are temporary, localized to individual work sites, and managed through standard County permitting procedures that prioritize emergency access, the Project would not substantially impair an adopted emergency response or evacuation plan. In the long term, the removal of industrial facilities eliminates potential on-site hazards (e.g., fires, explosions, or hazardous material releases) that could otherwise complicate an emergency response in these areas.

Impact 5.20-2: Would the proposed Project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? [Threshold WF-2]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project), due to factors like slope and wind, would exacerbate wildfire risks or expose project occupants to significant pollutant concentrations from a wildfire. The analysis considers that numerous Project sites are located within Very High Fire Hazard Severity Zones (VHFHSZs), which are characterized by steep topography, flammable vegetation, and a history of fire.

Short-Term Risk During Decommissioning

The Project's temporary decommissioning activities will involve the use of vehicles, heavy equipment, and "hot work" (e.g., cutting metal), which are potential ignition sources. However, these activities are strictly regulated by a comprehensive fire safety framework that prevents them from significantly exacerbating existing wildfire risks. All decommissioning work must comply with:

- The Los Angeles County Fire Code (Title 32): This legally enforceable code mandates specific fire prevention measures for any work in a VHFHSZ, including mandatory vegetation clearance (weed abatement) to create defensible space, requirements for spark arrestors on all equipment, protocols for hot work, and the presence of on-site fire suppression equipment. The LACoFD also has the authority to curtail or halt all hazardous activities during Red Flag Warnings.
- Cal/OSHA Regulations: All contractors must adhere to mandatory worker safety standards for fire prevention, including the implementation of an Injury and Illness Prevention Program (IIPP) that addresses site-specific fire hazards.

Because adherence to this extensive regulatory framework is mandatory, the temporary and localized ignition risk from decommissioning activities is managed to a level that would not substantially exacerbate the overall wildfire risk of the surrounding area.

Long-Term Effect on Wildfire Risk

The long-term outcome of the Project is the permanent removal of industrial infrastructure from hundreds of sites, many in high-hazard areas. This eliminates ongoing potential ignition sources (e.g., malfunctioning pumps or electrical equipment) and removes stores of flammable and combustible petroleum products from the Wildland-Urban Interface (WUI). This outcome is consistent with state and local goals to reduce overall wildfire risk in vulnerable communities.

Exposure of Project Occupants

The only "occupants" associated with the Project are the temporary decommissioning workforce. This trained workforce will operate under mandatory Cal/OSHA safety plans, which include emergency action and evacuation procedures in the event of a wildfire, thereby managing their exposure risk. The Project does not introduce new permanent residents, employees, or other sensitive receptors into these high-hazard zones.

Consistent with the findings of the CAP PEIR, given that temporary risks are managed through mandatory regulations and the long-term effect does not exacerbate risk, the Project would not

exacerbate wildfire risks or expose project occupants to significant pollutant concentrations from wildfire.

Impact 5.20-3: Would the proposed Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? [Threshold WF-3]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would require the installation or maintenance of associated infrastructure—such as roads, fuel breaks, or power lines—that could exacerbate wildfire risk.

The Project involves the decommissioning and removal of existing oil and gas infrastructure at previously developed sites; it does not involve new development or an increase in population that would require the construction of new supporting infrastructure.

The Project's activities will be supported by the existing network of access roads and do not require the construction of new roads. Similarly, the Project will result in the removal of the need for dedicated power lines and other on-site utilities, not the installation of new ones. The Project does not include the construction or maintenance of fuel breaks or emergency water sources.

Because the Project's entire scope is focused on the removal of existing industrial infrastructure and it does not require the installation or ongoing maintenance of any new infrastructure that could exacerbate fire risk, no impact related to this threshold would occur.

Impact 5.20-4: Would the proposed Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? [Threshold WF-4]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would expose people or structures to significant risks from post-fire slope instability, such as landslides or debris flows, by altering slopes or drainage patterns.

Exposure of People and Structures

The Project does not involve the construction of new homes, businesses, or other habitable structures, and it does not introduce a new permanent population into areas that could be subject to post-fire hazards. The only "people" on-site are the temporary decommissioning workforce, and the "structures" involved are the industrial facilities being removed. Therefore, the Project does not increase the number of permanent structures or residents exposed to post-fire risks.

Slope and Drainage Stability

Decommissioning and site restoration activities will involve temporary ground disturbance, including the removal of well pads and access roads, which may require grading. If performed improperly, such activities could potentially lead to slope instability.

However, all grading and earthwork in the unincorporated County are subject to the mandatory engineering standards of the Los Angeles County Grading Code (County Code, Title 26). This code is specifically designed to ensure that all graded slopes are stable and that drainage is properly managed to prevent erosion and landslides. The Project's performance standards for Site Restoration further require that operators return decommissioned sites to a safe and stable condition, consistent with all County requirements.

By adhering to these mandatory regulations, the Project will not create or worsen conditions that could lead to post-fire slope failures. In the long term, the proper restoration of these industrial sites to more natural contours may improve overall slope stability compared to the baseline condition.

Because the Project does not introduce new people or structures to these hazards, and because all ground-disturbing work is governed by strict County codes to ensure slope stability, the Project would not expose people or structures to significant post-fire risks.

Impact 5.20-5: Would the proposed Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? [Threshold WF-5]

Less Than Significant Impact.

This analysis evaluates whether the Revised Oil Well Ordinance (Project) would expose people or structures to a significant risk of loss, injury, or death from wildland fires. This threshold serves as a summary of the overall risk profile established in the preceding analyses.

The Project does not involve the construction of new homes, businesses, or other habitable structures, and it does not introduce a new permanent population into Very High Fire Hazard Severity Zones (VHFHSZs) or other high-risk areas. The people associated with the Project are the temporary decommissioning workforce, and the structures are the industrial facilities being removed. Therefore, the Project does not increase the number of permanent receptors exposed to existing wildfire risk.

As analyzed under Threshold WF-2, the temporary ignition risk from decommissioning activities is managed to a less-than-significant level through mandatory compliance with the comprehensive safety regulations of the Los Angeles County Fire Code and Cal/OSHA. Furthermore, as analyzed under Threshold WF-1, the Project would not impair emergency response or evacuation plans.

The long-term outcome of the Project (secured by the mandates of PDF-LU-1 and PDF-LU-2) is the permanent removal of industrial ignition sources and flammable materials from hundreds of sites, many of which are located within the Wildland-Urban Interface (WUI). This action does not create a new risk; rather, it removes an existing industrial hazard from the landscape.

Because the Project does not introduce new people or structures to high-hazard areas, and because temporary operational risks are strictly managed by existing fire codes, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

5.20.4 Cumulative Impacts

This section evaluates the potential for the Revised Oil Well Ordinance (Project), in combination with other past, present, and reasonably foreseeable future projects, to result in a significant cumulative impact related to wildfire. The geographic scope for this analysis is Los Angeles County. The cumulative context is one of increasing overall wildfire risk, as ongoing regional development places more people and structures in the Wildland-Urban Interface (WUI), potentially straining emergency services and increasing the potential for wildfire losses.

Unlike development projects that contribute to this cumulative increase in risk, the Project involves the removal of existing industrial infrastructure. Its incremental contribution to cumulative impacts is analyzed below.

- Emergency Response and Evacuation: Cumulative development can increase regional traffic and population density, potentially congesting evacuation routes during a widespread wildfire. The Project's contribution to this cumulative effect is limited to temporary and localized truck traffic during decommissioning, which will be managed through standard County traffic control requirements to maintain emergency access. The Project adds no new permanent population or traffic to the region. Therefore, its contribution to cumulative impacts on emergency plans is not considerable.
- Exacerbation of Wildfire Risk: The primary cumulative impact is the increased exposure of people and property to wildfire as the WUI expands. The Project's adverse contribution is the minor, temporary, and highly regulated ignition risk during decommissioning activities. In the long term, the Project contributes to reducing overall risk by permanently removing hundreds of industrial ignition sources and stores of flammable materials from high-hazard areas. Because its adverse contribution is minor and its long-term outcome is consistent with regional fire safety goals, the Project's contribution is not cumulatively considerable.
- Infrastructure and Post-Fire Hazards: Cumulative development requires new infrastructure (e.g., power lines) that can be ignition sources and involves grading that can create post-fire landslide risks. The Project removes, rather than installs, infrastructure and all site restoration work must comply with County grading codes to ensure slope stability. Therefore, the Project makes no adverse contribution to these cumulative impacts.

Because the Project's adverse contributions to cumulative wildfire impacts are temporary and minor, and its long-term effects are consistent with regional fire safety goals, the Project's incremental effect is not cumulatively considerable.

5.20.5 Level of Significance Before Mitigation

Based on the analysis presented in Section 5.20.3, all potential impacts related to wildfire would be less than significant.

The Project does not introduce new people or structures into high-hazard areas, nor does it impair emergency response plans. The temporary ignition risks associated with decommissioning activities are managed to a less-than-significant level through mandatory compliance with the comprehensive safety requirements of the Los Angeles County Fire Code and Cal/OSHA. The long-term outcome of the Project (via PDF-LU-1 and PDF-LU-2) is the permanent removal of industrial fire hazards from the Wildland-Urban Interface. Therefore, no significance thresholds would be exceeded.

5.20.6 Mitigation Measures

No mitigation measures are required. The analysis in the preceding sections concluded that the Project would not result in any significant adverse impacts related to wildfire.

This finding is based on the Project's built-in mandates (PDF-LU-1 and PDF-LU-2), which ensure a beneficial long-term reduction in wildfire risk by removing industrial hazards from the Wildland-Urban Interface, as well as mandatory compliance with existing regulatory frameworks governing temporary fire safety during decommissioning (such as the Los Angeles County Fire Code and Cal/OSHA regulations). Because the Project does not result in significant impacts related to wildfire, these PDFs and existing regulations are not acting as CEQA mitigation for this resource topic.

5.20.7 Level of Significance After Mitigation

As established in Section 5.20.5, all impacts related to wildfire are less than significant before mitigation. Because no mitigation measures are required, the level of significance remains less than significant.

5.20.8 References

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CHAPTER 6 OTHER CEQA CONSIDERATIONS

This chapter addresses additional topics required for discussion in an Environmental Impact Report (EIR) by the California Environmental Quality Act (CEQA) and the State CEQA Guidelines. The topics evaluated in this chapter include the potential for the Revised Oil Well Ordinance (Project) to have growth-inducing impacts, a summary of significant and unavoidable environmental effects, and a discussion of significant irreversible environmental changes.

6.1 GROWTH-INDUCING IMPACTS

Pursuant to CEQA Guidelines Section 15126.2(e), an EIR must discuss a project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The discussion of growth inducement must focus on a project's characteristics that might encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It is important to note that under CEQA, growth is not assumed to be beneficial, detrimental, or of little significance to the environment.

This analysis evaluates the Project against the criteria for growth inducement set forth in the CEQA Guidelines, which generally describe such effects as:

- Fostering economic growth, population growth, or the construction of additional housing.
- Removing obstacles to population growth (e.g., expanding major infrastructure).
- Taxing existing community services or facilities to such an extent that the construction of new facilities, which could cause significant environmental effects, would be required.
- Encouraging or facilitating other activities that could significantly affect the environment.

The analysis is based on the Project's characteristics as a countywide regulatory action, the existing environmental and planning context of the unincorporated areas, and the regional growth forecasts established by the Southern California Association of Governments (SCAG).

6.1.1 Fostering Economic or Population Growth

A project is typically considered directly growth-inducing if it involves the construction of a substantial number of new housing units or the creation of a major new employment center that would attract new residents to an area. A project may be indirectly growth-inducing if it creates a substantial number of new permanent jobs, thereby generating secondary demand for new housing and services.

The Project would not foster economic or population growth through these mechanisms. The Project is a regulatory action to amend the County's Zoning Code and General Plan. It does not involve the construction or entitlement of any new developments. As such, the Project would have no impact with respect to direct growth inducement.

Furthermore, the Project would not indirectly induce growth by creating new permanent employment. Rather than establishing new job opportunities, the Project will result in the phased elimination of the oil and gas extraction industry and a corresponding reduction in the permanent jobs associated with those operations within the unincorporated areas. While the decommissioning and site restoration activities required by the Project will create temporary, short-term employment, these jobs are specialized, limited in duration, and are expected to be filled by the existing regional labor force. They would not be of a scale or permanence to attract a substantial new population to the unincorporated areas of Los Angeles County that would in turn require the construction of new housing. Therefore, the Project would not indirectly induce population growth through the creation of new employment.

6.1.2 Removal of Obstacles to Population Growth

A project can also be considered growth-inducing if it removes a major physical or regulatory obstacle to growth, thereby enabling or accelerating development in a previously constrained area. Common examples include the extension of major infrastructure—such as a sewer main, water line, or new freeway interchange—into an unserved area, or a general plan amendment that upzones a large area of land from a non-urban to an urban use.

The Project would not remove an obstacle to growth in this manner. The Project does not include the construction or extension of any public infrastructure. The decommissioning of existing facilities will involve the removal, not the expansion, of private infrastructure (e.g., pipelines, electrical connections). As no new infrastructure is being provided to accommodate or enable new development, the Project would not indirectly induce growth through this mechanism.

The Project does, however, remove an existing industrial land use from numerous parcels throughout the unincorporated areas. Over the long term, the remediation and restoration of these sites could make them available for other uses consistent with their General Plan land use designation and zoning. However, making land available for planned development is distinct from inducing unplanned growth. The Project does not remove a regulatory obstacle to growth for the following reasons:

- No Entitlements for Future Development are Granted: The Project does not entitle, approve, or otherwise authorize any future development on any of the sites to be decommissioned.
- Future Development is Subject to Existing Plans: Any subsequent proposal for a specific development project (e.g., residential, commercial, or parkland) on a restored oil field site would be required to be consistent with the County's General Plan and all applicable zoning regulations, area plans, and specific plans. The Project does not alter these underlying land use designations to allow for more intensive development than is already planned.

- Separate Environmental Review is Required: Any future development proposal would be subject to its own, independent, project-specific environmental review process pursuant to CEQA at the time it is formally proposed. This future review would analyze the environmental impacts based on the specific details of the development proposal.

Therefore, while the Project facilitates the potential for future development that is already contemplated in the County's long-range planning documents, it does not remove a barrier to growth in a manner that would lead to substantial unplanned growth.

6.1.3 Taxation of Public Services and Facilities

A project may be considered growth-inducing if it causes a population increase that would tax existing community services (e.g., schools, fire stations, parks) to such an extent that the construction of new or expanded facilities would be necessary, and the construction of those new facilities could, in turn, cause significant environmental impacts.

This type of growth-inducing impact is a secondary effect that is contingent upon a project first causing substantial population growth. As established in Section 6.1.1, the Project would not induce population growth. It does not construct housing or create substantial new permanent employment. Consequently, the Project would not increase demand on public services or necessitate the construction of new public facilities. Therefore, the Project would have no growth-inducing impact related to the taxation of existing services.

6.1.4 Encouraging or Facilitating Other Activities

Finally, a project may be considered growth-inducing if its characteristics would encourage and facilitate other activities that could significantly affect the environment. The primary "other activity" that could be facilitated by this Project is the future development of the restored well sites, as discussed in Section 6.1.2. However, this future development is not an unplanned consequence of the Project; rather, it is development that is already anticipated and guided by the County's General Plan and land use regulations. Because this future development will be subject to its own independent, project-specific CEQA review, the adoption of this ordinance does not create unforeseen or unmitigated environmental impacts from other facilitated activities.

The Project does not set a precedent that would facilitate other, unrelated types of development in a manner that would cause adverse environmental effects. The Project is a specific regulatory action to phase out a nonconforming industrial land use that has been determined to be incompatible with the County's public health, safety, and environmental goals. This is a standard and appropriate use of the County's land use and police powers and does not, in itself, facilitate other unrelated projects.

6.1.5 Conclusion on Growth-Inducing Impacts

The Revised Oil Well Ordinance is a regulatory action that de-intensifies land use by phasing out an existing industrial activity. It does not construct housing, create substantial new permanent employment, extend growth-enabling infrastructure, or remove an obstacle to unplanned growth. For these reasons, the Project is not considered growth-inducing under CEQA.

6.2 SUMMARY OF SIGNIFICANT ENVIRONMENTAL EFFECTS

Based on the analysis presented in Chapter 5 of this EIR, implementation of the Project would result in less-than-significant or beneficial impacts for all environmental topics with the exception of Mineral Resources. All other potential environmental impacts of the Project were determined to be less than significant or beneficial and would not require mitigation. The Project would result in one significant and unavoidable environmental impact, which is discussed below.

6.2.1 Significant Unavoidable Impacts

Section 15126.2(b) of the CEQA Guidelines requires an EIR to describe any significant impacts that cannot be avoided if the project is approved. This section identifies those impacts that would remain significant even after the application of all feasible mitigation measures.

- Mineral Resources: As analyzed in detail in Section 5.12, Mineral Resources, the Project's fundamental purpose is to prohibit the extraction of oil and gas resources to protect public health and the environment. A direct and necessary consequence of this action is that known, valuable oil and gas reserves within the unincorporated areas will be rendered permanently unavailable for extraction. Under CEQA, the loss of availability of a known mineral resource of value to the region and the residents of the State is considered a significant environmental impact. While the Project's built-in 20-year amortization schedule (PDF-LU-1) minimizes the immediate severity of this loss by providing a gradual, managed transition, the ultimate end-state is a permanent prohibition. Because the very purpose of the Project is to cause this outcome, no additional feasible mitigation measures exist that could reduce this impact to a less-than-significant level without fundamentally conflicting with the Project's core objectives. Therefore, this impact is considered significant and unavoidable.

6.3 Significant Irreversible Environmental Changes

The CEQA Guidelines (Section 15126.2[c]) require an EIR to address significant irreversible environmental changes that would be caused by a project. Such a change would occur if the project involves a large commitment of nonrenewable resources, if it would cause irreversible damage from an environmental accident, or if the proposed land use would commit future generations to a similar use.

6.3.1 Commitment of Nonrenewable Resources

Implementation of the Project will require a commitment of nonrenewable resources, primarily in the form of fossil fuels (e.g., diesel and gasoline) consumed by heavy equipment and vehicles

during the decommissioning and site restoration activities. However, this commitment is not considered "large" in the context of regional energy consumption. The use of these resources will be temporary, intermittent, and spread across numerous sites over a 20-year period. Consistent with the programmatic findings of the CAP PEIR, this temporary expenditure of energy is a necessary, short-term investment required to achieve the Project's permanent, long-term environmental and public health benefits, including the elimination of an energy-intensive industrial land use and its associated hazards.

The most significant irreversible change related to nonrenewable resources is the Project's effect to render the remaining oil and gas reserves unavailable for future extraction. As discussed in Section 6.2.1, this loss of availability is a significant and unavoidable impact and represents an irreversible commitment to forego the use of this specific mineral resource in favor of protecting public health and the environment.

6.3.2 Irreversible Damage from Environmental Accidents

The Project will not increase the potential for irreversible damage from environmental accidents. To the contrary, a primary objective of the Project is to reduce and ultimately eliminate the long-term risk of such accidents by phasing out active oil and gas operations. The existing facilities present ongoing risks of well blowouts, pipeline ruptures, storage tank failures, fires, and explosions, which could cause irreversible damage to surrounding communities and ecosystems. By mandating the permanent plugging of wells and the removal of this infrastructure, the Project provides a long-term beneficial impact by significantly reducing these risks.

The short-term decommissioning activities will be conducted in accordance with robust safety standards and regulations from multiple agencies, including CalGEM, Cal/OSHA, and the County Fire Department. Furthermore, the Project's integrated Project Design Features, such as PDF-HAZ-2 (Community Health, Safety, and Notification Plans), are specifically designed to manage risks during the decommissioning phase. Additionally, mandatory compliance with state and regional cleanup standards ensures that legacy contamination is addressed, further reducing the potential for long-term environmental damage.

6.3.3 Irreversible Changes in Land Use

The Project will cause a permanent change in land use by eliminating oil and gas extraction as a permitted activity in the unincorporated areas. This action removes an industrial land use but does not commit future generations to a new, specific use. This de-intensification of land use represents a beneficial and irreversible change that expands, rather than constrains, the options available to future generations.

6.4 REFERENCES

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CEQA Guidelines, California Code of Regulations, Title 14, Sections 15126.2(b), 15126.2(c), and 15126.2(e).

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CHAPTER 7 ALTERNATIVES TO THE PROPOSED PROJECT

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines establish the framework and requirements for the analysis of alternatives in an Environmental Impact Report (EIR). The primary purpose of an alternatives analysis is to reduce or avoid the significant environmental impacts of a project while still feasibly attaining most of the basic project objectives (CEQA Guidelines § 15126.6[a]). An EIR must "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6[a]).

CEQA Public Resources Code (PRC) Section 21002.1(a) states that "the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." The analysis must focus on alternatives that can avoid or substantially lessen any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or be more costly (CEQA Guidelines § 15126.6[b]).

The range of alternatives required in an EIR is governed by a "rule of reason," meaning the EIR need only set forth those alternatives necessary to permit a reasoned choice. The selection of alternatives is based on their ability to feasibly attain most of the basic project objectives and their potential to avoid or substantially lessen one or more of the project's significant effects. An EIR need not consider every conceivable alternative to a project but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

This chapter evaluates four alternatives to the proposed Revised Oil Well Ordinance:

1. No Project Alternative
2. Extended Amortization Period Alternative (30 Years)
3. Geographic Limitation Alternative (Health and Safety Setback)
4. Enhanced Performance Standards Alternative (No Phase-Out)

This analysis provides a comparative evaluation of the alternatives against the Project and concludes by identifying the Environmentally Superior Alternative, as required by CEQA Guidelines Section 15126.6(e)(2).

7.1 PROJECT OBJECTIVES

To facilitate a meaningful comparison, it is important to restate the fundamental objectives of the proposed Revised Oil Well Ordinance. The fundamental purpose of the Project is to phase-out and ban oil and gas operations within unincorporated Los Angeles County so as to safeguard community health and well-being, protect air, water, biological, and ecological resources, and ensure responsible land use through environmental justice considerations. These objectives, informed by directives from the County of Los Angeles Board of Supervisors, are:

1. **Prioritize Public Health, Safety, and Environmental Justice:** To primarily protect and improve public health and safety for all communities in unincorporated Los Angeles County, with a particular focus on frontline and vulnerable populations, including communities of color and low-income communities, disproportionately affected by oil and gas operations. This includes significantly reducing exposures and pollution burden, and mitigating health risks associated with existing, potential future, and former oil and gas exploration, production, and decommissioning activities and their legacy environmental conditions.
2. **Enhance and Protect Overall Environmental Quality:** To improve and safeguard the quality of the environment—including air, water, soil, biological resources, and aesthetic value—by minimizing the adverse impacts of oil and gas operations and ensuring site remediation, restoration, and mitigation of ecological harm, thereby contributing to healthier communities and ecosystems.
3. **Prohibit Future Oil and Gas Development to Prevent New Risks:** To prohibit the establishment of new oil and gas exploration, drilling, and production wells and associated facilities throughout unincorporated Los Angeles County, thereby preventing the introduction of new potential adverse health, safety, and environmental impacts and averting future land use conflicts.
4. **Establish Robust Standards for Remaining Operations and Comprehensive Decommissioning:** To implement and enforce comprehensive and protective performance standards for remaining (non-conforming) oil well operations during their amortization, and for their eventual timely, safe, and environmentally sound decommissioning. This includes developing and implementing requirements for responsible party-funded plugging and abandonment of all wells, ensuring site remediation, establishing robust financial assurance mechanisms (bonding), and restoring sites in accordance with clearly defined requirements.
5. **Implement Specific Protections and Decommissioning Strategies in Key Areas:** To apply the overarching health, safety, environmental, and land use compatibility objectives within designated areas through targeted regulatory updates, including:
    a. Amending the Baldwin Hills Community Standards District (CSD) (Los Angeles County Code Chapter 22.310) to guide decommissioning of the Inglewood Oil Field.
    b. Amending the Newhall Ranch Specific Plan to integrate updated oil and gas regulations, including provisions for the phase-out of existing oil production and ensuring robust decommissioning and restoration.
6. **Align with and Advance State and Regional Policies:** To align County regulations with, and advance the goals of, State legislative and policy directives aimed at transitioning away from fossil fuel extraction, protecting communities near oil and gas facilities, and ensuring comprehensive and responsible management of legacy oil production sites.

7.2 ALTERNATIVES CONSIDERED BUT REJECTED FROM FURTHER ANALYSIS

CEQA Guidelines Section 15126.6(c) requires an EIR to briefly describe alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and the

reasons for their rejection. The following alternatives were considered but rejected because they were determined to be infeasible, unable to meet most of the basic project objectives, or unable to avoid significant environmental impacts.

- Immediate Ban on All Operations: This alternative would require the immediate cessation of all oil and gas operations upon ordinance adoption. This was rejected as legally and economically infeasible. An immediate ban would not provide existing operators with a reasonable amortization period to recoup investment. Furthermore, it would result in more severe and abrupt socioeconomic impacts than the Project.
- Alternative Location for Oil and Gas Operations: This alternative is not applicable to this project. The project is a regulatory action that applies to existing, fixed oil and gas resources and facilities used to extract those resources. Therefore, an alternative location alternative is not relevant or feasible.

7.3 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

7.3.1 Description

As mandated by CEQA Guidelines Section 15126.6(e), the No Project Alternative describes the environmental conditions that would be reasonably expected to occur in the foreseeable future if the project were not approved. Under this alternative, the existing regulatory framework would remain in place. The County would not adopt the proposed ordinance to prohibit new wells or phase out existing ones. Oil and gas operations would continue to be governed by existing County codes (e.g., Title 22 Planning and Zoning), the Baldwin Hills Community Standards District, and the rules of agencies like the California Geologic Energy Management Division (CalGEM) and the South Coast Air Quality Management District (SCAQMD). New wells, as well as the re-drilling or deepening of existing wells, could be permitted subject to these existing regulations and any state law to the contrary.

7.3.2 Impact Analysis

The No Project Alternative would avoid the sole significant and unavoidable impact of the Project: the loss of access to valuable mineral resources. Consequently, it would also avoid the associated economic and social effects on operators, specialized labor, and County tax revenue. However, as recognized by CEQA Guidelines Section 15021(d), this alternative would completely fail to provide the decent and satisfying living environment the County seeks for its residents. By maintaining the status quo, this alternative would fail to meet any of the Project's primary objectives. The existing public health risks and land use incompatibility associated with oil and gas operations would continue indefinitely, and communities would continue to be exposed to emissions, noise, and potential hazards. Furthermore, this alternative would not align with the broader policy direction of the State to transition away from fossil fuel extraction to meet climate goals.

7.3.3 Ability to Meet Project Objectives

This alternative would not meet any of the Project objectives. By maintaining the status quo, it would not provide maximum health protection, address environmental justice concerns, prohibit new drilling, phase out existing operations, prevent future land use conflicts with oil and gas facilities, or align with state and regional climate goals.

7.4 ALTERNATIVE 2: EXTENDED AMORTIZATION PERIOD ALTERNATIVE (30 YEARS)

7.4.1 Description

This alternative would be similar to the Project, but would extend the amortization period for existing nonconforming wells from 20 years to a longer timeframe of 30 years. The prohibition on new wells would still apply upon ordinance adoption. This alternative is designed to lessen the impact of the loss of access to mineral resources by allowing operators additional time to recoup their investments and plan for decommissioning.

7.4.2 Impact Analysis

A 30-year amortization period would delay the Project's significant and unavoidable physical impact on mineral resources, allowing operators additional time to extract reserves. By spreading the phase-out over a longer period, the associated economic and social effects on operators and the decline in County tax revenue would be more gradual, potentially allowing for a more orderly economic transition. However, this alternative would also delay the full achievement of the Project's public health and environmental objectives. Existing wells would operate for an additional decade, meaning that nearby communities would continue to be exposed to operational impacts (air emissions, noise, visual blight) for a longer time. While it ultimately achieves the same environmental benefits as the Project, the realization of those benefits is postponed.

Economic and social effects of a project are not significant effects on the environment. (State CEQA Guidelines, section 15131(a).) A public agency must consider economic and social factors together with environmental and technological factors to determine whether changes in a project are feasible to reduce or avoid the significant effects on the environment identified in the EIR (here, impacts to mineral resources). (State CEQA Guidelines, section 15131(c).) CEQA recognizes that in deciding whether and how to approve a project, the lead agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. (State CEQA Guidelines, section 15021(d).) While a longer amortization period would be more economically palatable for operators, it would delay the decent and satisfying living environment that the County seeks to achieve for all County residents currently affected by oil and gas facilities.

7.4.3 Ability to Meet Project Objectives

This alternative would meet all of the Project objectives, but over a longer timeframe. It prohibits new drilling upon adoption and establishes a clear, orderly phase-out. Ultimately, it provides maximum health protection, resolves land use conflicts, and aligns with climate goals. However, the full attainment of these objectives is delayed by 10 years compared to the Project, extending the duration of exposure to operational impacts for nearby communities.

7.5 ALTERNATIVE 3: GEOGRAPHIC LIMITATION ALTERNATIVE (HEALTH AND SAFETY SETBACK)

7.5.1 Description

This alternative focuses the phase-out requirement exclusively on areas of greatest land use conflict and public health concern. Instead of a countywide phase-out, this alternative would prohibit new wells and mandate the amortization and phase out only of existing wells within a 3,200-foot buffer distance of sensitive land uses (e.g., residences, schools, hospitals, childcare facilities, and parks). This approach mirrors the geographic boundary of the health and safety setbacks established by State Senate Bill 1137. However, while SB 1137 allows existing wells within this zone to continue operating under stricter controls, this alternative would mandate their complete closure. Oil and gas operations located outside these 3,200-foot 'health and safety zones' (typically in more remote or industrially zoned areas) would be exempt from the phase-out and could continue to operate.

7.5.2 Impact Analysis

This alternative would somewhat lessen the Project's significant and unavoidable impact on mineral resources, as extraction could continue at wells located outside the 3,200-foot setback. By preserving some local production, it would consequently lessen the associated economic and social effects of the phase-out, preserving a portion of the associated jobs and tax revenue. This alternative directly and effectively achieves the primary Project objective of protecting the most vulnerable populations from health risks and nuisance impacts. However, it would not fully meet the goals of a countywide phase-out or provide environmental protection in all areas. It would also be less effective at meeting regional GHG reduction goals compared to the Project, although it would have a lower potential for carbon leakage by maintaining some local production.

7.5.3 Ability to Meet Project Objectives

This alternative would partially meet the Project objectives. It provides maximum health protection and addresses environmental justice concerns only for those communities located within the setback, failing to do so on a countywide basis. It prohibits new drilling and phases out existing

wells only within the setback areas, leaving other areas open to continued operations. Therefore, it only partially prevents future land use conflicts and aligns with regional climate goals.

7.6 ALTERNATIVE 4: ENHANCED PERFORMANCE STANDARDS ALTERNATIVE (NO PHASE-OUT)

7.6.1 Description

This alternative would focus on mitigating operational impacts through stricter regulation rather than eliminating the use entirely. Under this alternative, the County would not prohibit existing wells or phase them out. Instead, it would adopt a new ordinance imposing a comprehensive and significantly more stringent set of performance standards on all existing and any future oil operations (noting that state law under SB 1137 already prohibits new wells within 3,200 feet of sensitive receptors). These standards would be designed to internalize the costs of environmental and public health impacts and could include:

- Mandatory Electrification: Requiring all drilling rigs, pumps, and processing equipment to be powered by the electrical grid to eliminate onsite combustion emissions.
- Advanced Emission Controls: Requiring enclosed vapor recovery systems on all tanks and equipment that exceed current SCAQMD Best Available Control Technology (BACT) requirements.
- Continuous Fenceline Monitoring: Requiring real-time, publicly accessible fenceline monitoring for toxic air contaminants and criteria pollutants.
- Noise and Visual Mitigation: Requiring full enclosure of noisy equipment and aesthetic treatments for all visible structures.
- Increased Financial Assurances: Requiring operators to post bonds sufficient to cover the full cost of well plugging and site remediation.

7.6.2 Impact Analysis

This alternative would avoid the Project's significant and unavoidable impact on mineral resources, as extraction would continue. By preserving the industry, it would consequently avoid the associated economic and social effects of a mandatory phase-out. However, the high capital and operational costs of compliance with these enhanced standards could render some wells economically infeasible, leading to lesser, indirect economic effects and potential operator consolidation. Environmentally, this alternative would only partially meet the objective of protecting public health by reducing operational emissions and nuisances. Most importantly, it would not eliminate the inherent risks of oil and gas operations (e.g., risk of upset, subsurface impacts) or fully resolve land use conflicts. Therefore, this alternative fundamentally fails to meet the core objectives of prohibiting future development and phasing out existing operations.

7.6.3 Ability to Meet Project Objectives

This alternative would partially meet the objective of protecting public health by reducing, but not eliminating, operational impacts. It would fail to meet the core objectives of providing maximum health protection, prohibiting new drilling, or establishing a phase-out of existing operations. Because industrial use would continue, it would not fully resolve land use conflicts or align with the state's goal of transitioning away from fossil fuels

7.7 SUMMARY OF ALTERNATIVES AND ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The table below provides a summary comparison of the environmental impacts of each alternative relative to the Project.

TABLE 7-1: Summary of Alternatives

Environmental Issue Area	Alternative 1: No Project	Alternative 2: Extended Amortization	Alternative 3: Setback	Alternative 4: Performance Standards
Air Quality/Public Health	Greater Impact	Temporarily Greater Impact	Lesser Benefit	Lesser Benefit
Greenhouse Gas Emissions	Neutral (No Leakage)	Similar to Project	Lesser Benefit	Lesser Benefit
Hazards & HazMat	Greater Impact	Temporarily Greater Impact	Lesser Benefit	Lesser Benefit
Land Use & Planning	Greater Impact	Temporarily Greater Impact	Lesser Benefit	Lesser Benefit
Mineral Resources	No Impact (Beneficial)	Somewhat Lesser Impact	Somewhat Lesser Impact	No Impact (Beneficial)
Noise	Greater Impact	Temporarily Greater Impact	Lesser Benefit	Lesser Benefit

CEQA Feasibility & Policy Considerations (Per § 15131)				
Socioeconomic / Economic Feasibility	No Phase-Out Impact	More Economically Palatable	Lesser Phase-Out Impact	High Compliance Costs

7.7.1 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires an EIR to identify the environmentally superior alternative. In this analysis, the No Project Alternative is considered environmentally superior with respect to the specific issue area of mineral resources, as it avoids the significant unavoidable impacts identified for the Project. However, when considering the totality of environmental impacts, the No Project Alternative is not environmentally superior to the Project. While the No Project Alternative would avoid the Project's sole significant and unavoidable impact (the loss of availability of mineral resources), it would do so at the expense of the Project's profound environmental benefits. The No Project Alternative would allow for the continued, indefinite operation of oil and gas facilities, perpetuating existing environmental risks and nuisances. This would result in greater long-term impacts to air quality, greenhouse gas emissions, hazards and hazardous materials, land use compatibility, and noise compared to the Project.

Because the No Project Alternative would result in greater overall environmental impacts by allowing existing oil and gas operations to continue indefinitely, it is not the environmentally superior alternative. Therefore, the Environmentally Superior Alternative is identified from among the remaining action alternatives evaluated in this EIR.

Among these remaining alternatives, the Geographic Limitation Alternative (Alternative 3) is identified as the Environmentally Superior Alternative. While it does not provide the same level of comprehensive, countywide health and environmental protection as the Project, it is the only alternative that substantially lessens the Project's sole significant and unavoidable impact (the loss of availability of mineral resources) by allowing continued extraction outside the 3,200-foot setback, while still achieving a substantial reduction in environmental impacts and hazards for the most vulnerable frontline communities

CHAPTER 8 EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the California Environmental Quality Act (CEQA) Guidelines requires an Environmental Impact Report (EIR) to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR.

The County of Los Angeles, as the Lead Agency, prepared a comprehensive Initial Study to evaluate the potential environmental impacts of the Revised Oil Well Ordinance (Project), a copy of which is included as Appendix C to this EIR. The Initial Study is a preliminary analysis used to determine which environmental topics could have a potentially significant impact and therefore require detailed analysis in an EIR.

However, to ensure the most thorough, conservative, and transparent public review process for this comprehensive countywide regulatory program, the County chose not to scope out any resource areas. Instead, the County elected to carry forward all environmental topics from the CEQA Appendix G checklist for a full and detailed analysis, regardless of the preliminary findings of the Initial Study.

Because all potential environmental effects were discussed in detail in the EIR, there are no effects that were "determined not to be significant and were therefore not discussed in detail" pursuant to CEQA Guidelines Section 15128. Detailed analyses and conclusions for all environmental topics—including those found to be less than significant or entirely beneficial—are presented comprehensively in Chapter 5, Environmental Impact Analysis, and are summarized in the Executive Summary of this EIR.

CHAPTER 9 SIGNIFICANT CUMULATIVE IMPACTS

The California Environmental Quality Act (CEQA) Guidelines Section 15130 requires that an Environmental Impact Report (EIR) discuss the cumulative impacts of a project when the project's incremental effect is "cumulatively considerable." A cumulative impact is defined as an impact that is created as a result of the combination of the project evaluated in the EIR together with other past, present, and reasonably foreseeable future projects causing related impacts (CEQA Guidelines Section 15355). A project's incremental effect is considered cumulatively considerable if it is significant when viewed in connection with the effects of other projects.

This chapter analyzes whether the incremental environmental effects of the proposed Revised Oil Well Ordinance (Project), when combined with the effects of other regional projects and long-term growth, would result in a significant cumulative impact.

9.1 APPROACH TO CUMULATIVE IMPACTS

CEQA Guidelines Section 15130(b) allows for two primary methods to establish the cumulative context: (1) a list of past, present, and reasonably foreseeable future projects, or (2) a summary of projections contained in an adopted general plan or related planning document.

For this program-level EIR, which evaluates a regulatory action with a county-wide geographic scope, the summary of projections method is the most appropriate and effective approach. This analysis uses the growth projections and the associated cumulative impact analyses from the Los Angeles County General Plan 2035 Final EIR and the Southern California Association of Governments' (SCAG) Connect SoCal 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). These documents account for the anticipated residential, commercial, and industrial development throughout the region and provide a comprehensive assessment of the long-term cumulative environmental effects of that growth.

The geographic scope of this cumulative analysis is generally the unincorporated areas of Los Angeles County. For certain topics with a broader reach, such as air quality and greenhouse gas emissions, the scope is the South Coast Air Basin (SoCAB) and the Mojave Desert Air Basin (MDAB). For mineral resources, the scope is the greater Los Angeles Basin.

The analysis in this chapter considers the environmental effects of projected regional growth in combination with the incremental environmental effects of the Project.

Furthermore, pursuant to CEQA Guidelines Section 15152, this cumulative analysis tiers from the Los Angeles County 2045 Climate Action Plan (CAP) Program EIR (PEIR). The CAP PEIR programmatically analyzed the region-wide cumulative environmental effects of implementing climate action measures, including the phase-out of fossil fuel operations (Measure ES1). The CAP PEIR concluded that the transition away from fossil fuels results in cumulatively beneficial programmatic impacts to air quality, greenhouse gas emissions, and public safety. Building upon those programmatic findings, this analysis concludes that the Project's incremental, temporary decommissioning impacts are not cumulatively considerable because they are strictly managed through the Project's enforceable Project Design Features (PDFs) and mandatory compliance with existing local, state, and federal regulations.

9.2 CUMULATIVE IMPACT ANALYSIS

The following discussion evaluates the Project's potential to contribute to significant cumulative impacts for each of the environmental topics analyzed in Chapter 5.

Aesthetics, Air Quality, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Noise, and Wildfire

Cumulative Context: Ongoing and projected development within Los Angeles County, as described in the General Plan and SCAG's RTP/SCS, will result in significant and unavoidable cumulative impacts in these issue areas. Regional growth will continue to degrade scenic vistas with new construction, generate emissions that contribute to non-attainment of air quality standards, increase regional GHG emissions, place more development in high fire hazard zones, and increase ambient noise levels. This establishes an existing and projected significant adverse cumulative condition.

Project's Incremental Contribution: The Project's incremental contribution to these significant cumulative impacts is not cumulatively considerable. The Project does not induce growth or propose new development. Instead, it is a regulatory action that results in the permanent removal of an industrial land use. By phasing out oil and gas operations (as mandated by PDF-LU-1 and PDF-LU-2), the Project:

Reduces sources of visual blight, industrial emissions, GHG emissions (particularly methane), and operational noise.

Removes significant quantities of flammable and hazardous materials and potential ignition sources from communities, including from Very High Fire Hazard Severity Zones.

Contributes to a cumulative beneficial effect by incrementally improving aesthetics, air quality, and public safety, thereby helping to offset, albeit on a limited scale, the adverse cumulative impacts of regional growth.

Conclusion: The Project's effect is counter to the prevailing adverse cumulative trend. Therefore, the Project's cumulative impact with respect to aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, noise, and wildfire is less than significant.

Biological Resources, Cultural Resources, Tribal Cultural Resources, Geology and Soils, and Hydrology and Water Quality

Cumulative Context: Regional development will continue to result in the loss of habitat, place development in geologically hazardous areas, and increase pollutant loads in stormwater runoff, leading to significant cumulative impacts on biological resources, hydrology, and potentially cultural and paleontological resources.

Project's Incremental Contribution: The Project's incremental contribution to these cumulative impacts is not cumulatively considerable. Short-term decommissioning activities involve ground disturbance; however, as analyzed in Chapter 5, these effects are reduced to a less-than-significant level through mandatory compliance with existing federal, state, and local regulations regarding biological and cultural resource protection, paleontological monitoring, grading, and stormwater pollution prevention. Furthermore, the Project's built-in mandate for a Cultural Assessment (PDF-TCR-1) proactively identifies and protects sensitive tribal resources prior to decommissioning. Over the long term, the Project provides a cumulative benefit by remediating contaminated soil and water and restoring disturbed sites with native vegetation, which can improve habitat and water quality.

Conclusion: Because the Project's own impacts are less than significant and its long-term effects are beneficial, its incremental contribution is not cumulatively considerable. Therefore, the Project's cumulative impact with respect to biological resources, cultural resources, tribal cultural resources, geology and soils, and hydrology and water quality is less than significant.

Land Use and Planning, Public Services, Recreation, Transportation, and Utilities and Service Systems

Cumulative Context: Projected regional growth will increase demand for public services, recreation, transportation infrastructure, and utilities, leading to potentially significant cumulative impacts in these areas.

Project's Incremental Contribution: The Project has no potential to contribute to these adverse cumulative impacts. As established in Chapter 6, the Project is not growth-inducing and does not increase population. Therefore, it does not generate any new demand for public services, parks, transportation capacity, or utilities. To the contrary, by eliminating an industrial land use, the Project results in a long-term reduction in VMT, demand for specialized emergency services (e.g., hazmat), and consumption of water and energy, representing a minor cumulative benefit.

Conclusion: A project that does not induce growth cannot contribute to growth-related cumulative impacts. Therefore, the Project's cumulative impact with respect to land use, public services, recreation, transportation, and utilities is less than significant.

Mineral Resources

Cumulative Context: A number of recent and ongoing regulatory actions at the state and local levels are designed to limit or phase out the extraction of oil and gas resources. These include actions by the City of Los Angeles to phase out oil drilling within its jurisdiction, as well as statewide policies and legislative efforts (such as Senate Bill 1137) to restrict fossil fuel extraction to protect public health and combat climate change. Together, these actions represent a significant cumulative trend toward reducing the availability of the region's known oil and gas reserves.

Project's Incremental Contribution: As analyzed in Section 5.12, the Project's fundamental purpose is to prohibit the extraction of oil and gas resources to protect public health and the environment. A direct and necessary consequence of this action is that known, valuable oil and gas reserves within the unincorporated areas will be rendered permanently unavailable for extraction. This action is a direct and substantial contribution to the regional cumulative trend of rendering these mineral resources unavailable.

Conclusion: The Project's incremental effect on the loss of availability of a known mineral resource is cumulatively considerable. Because causing this loss is the fundamental objective of the Project and the broader regional transition away from fossil fuels, there is no feasible mitigation. Therefore, the cumulative impact on mineral resources is significant and unavoidable.

Agriculture and Forestry Resources, and Population and Housing

Cumulative Context: Regional growth contributes to the cumulative loss of agricultural land.

Project's Incremental Contribution: As determined in Chapter 5, the Project would have no impact on these resource areas. The Project does not convert farmland, affect forest land, induce population growth, or displace housing.

Conclusion: A project that has no impact on a resource cannot contribute to a cumulative impact. Therefore, the Project's cumulative impact on agriculture and forestry resources, and population and housing is less than significant.

CHAPTER 10 ORGANIZATIONS AND PERSONS CONTACTED

In accordance with Section 15129 of the California Environmental Quality Act (CEQA) Guidelines, the following is a list of federal, state, regional, and local agencies, as well as organizations, Native American Tribes, and individuals who were consulted, provided data, or submitted comments during the preparation of this Environmental Impact Report (EIR).

State Agencies

California Department of Forestry and Fire Protection (CAL FIRE)

California Department of Transportation (Caltrans)

California Geologic Energy Management Division (CalGEM)

California Native American Heritage Commission (NAHC)

California Department of Toxic Substances Control (DTSC)

State Water Resources Control Board / Regional Water Quality Control Boards (Los Angeles and Lahontan Regions)

Regional and Local Agencies

Antelope Valley Air Quality Management District (AVAQMD)

City of Culver City

Los Angeles County Department of Public Health

Los Angeles County Department of Public Works

Los Angeles County Fire Department (LACoFD)

Los Angeles County Sanitation Districts (LACSD)

Los Angeles County Sheriff's Department (LASD)

South Coast Air Quality Management District (SCAQMD)

Southern California Association of Governments (SCAG)

Native American Tribes (AB 52 and SB 18 Consultation)

Band of Mission Indians (Patrick Tumamait, Native Chumash Consultant)

Fernandeño Tataviam Band of Mission Indians (Sarah Brunzell, Tribal Historic and Cultural Preservation Officer)

Gabrieleno Band of Mission Indians – Kizh Nation (Andrew Salas, Chairman)

Gabrieleno Tongva, San Gabriel Band of Mission Indians (Anthony Morales, Chief)

Quechan Indian Tribe of the Fort Yuma Reservation

San Manuel Band of Mission Indians (Alexandra McCleary, Ph.D.)

Santa Rosa Band of Cahuilla Indians

Tejon Indian Tribe

The Gabrielino Tongva Indians of California (Christina Conley, Cultural Resources Administrator)

Various Private Individuals and Companies

A complete list of private individuals who submitted scoping comments is available in the Scoping Report, included as Appendix B to this EIR.

CHAPTER 11 LIST OF PREPARERS

In accordance with Section 15129 of the California Environmental Quality Act (CEQA) Guidelines, this chapter identifies the public agency personnel who prepared this Environmental Impact Report (EIR). This EIR was prepared entirely in-house by the staff of the County of Los Angeles.

Lead Agency: County of Los Angeles

Department of Regional Planning

Amy Bodek, Director of Regional Planning

Connie Chung, Deputy Director, Advance Planning

Edward Rojas, Assistant Administrator, Advance Planning

Bruce Durbin, Supervising Regional Planner

Kenneth Warner, Regional Planner

Paulina Somosa, Regional Planner

Office of the County Counsel

Kathy Park, Deputy County Counsel

Lisa Jacobs, Deputy County Counsel